

**MASTER SPECIAL USE  
PERMIT AND PERMIT TO  
CONSTRUCT POWER LINE  
REPLACEMENT PROJECTS**

**EIR/EIS**

*Comment Letters Received*



## Index of Commenters on the Draft EIR/EIS

| Comment Letter Designator | Date of Letter  | Commenter  |
|---------------------------|---|--|
| <b>A</b>                  | <b><i>Federal Agencies and Officials</i></b>  |  |
| A1                        | 10/29/14  | U.S. Environmental Protection Agency, Region IX, Environmental Review Office (Scott Sysum)               |
| A2                        | 11/4/14   | U.S. Department of the Interior, Office of Environmental Policy and Compliance (Patricia Sanderson Port) |
| <b>B</b>                  | <b><i>State and Local Agencies and Officials</i></b>                                |  |
| B1                        | 9/17/14   | California Department of Transportation, District 11 Planning Division (Jacob Armstrong)                 |
| B2                        | 10/21/14  | Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (Scott Morgan)         |
| B3                        | 10/27/14  | City of San Diego (Jeffery Pasek)  |
| B4                        | 11/3/14   | California Department of Parks and Recreation, Colorado Desert District (Terry Gerson)                   |
| B5                        | 11/4/14   | California Department of Parks and Recreation, Colorado Desert District (Terry Gerson)                   |
| B6                        | 11/4/14   | California Department of Fish and Wildlife (Gail Sevens)   |
| B7                        | 11/4/14   | County of San Diego, Planning and Development Services (Darren Gretler)                                  |
| <b>C</b>                  | <b><i>Native American Tribes/Groups</i></b>   |  |
| C1                        | 10/1/14   | Pauma Band of Mission Indians (Jeremy R. Zagarella)  |
| C2                        | 11/4/14   | Kwaaymii Laguna Band of Indians (Carmen Lucas)   |
| <b>D</b>                  | <b><i>Community Groups, Non-Profit Organizations, and Private Organizations</i></b> |  |
| D1                        | 10/18/14  | Boulevard Planning Group (Donna Tisdale)   |
| D2                        | 10/29/14  | Courtney Ann Coyle, Attorney at Law  |
| D3                        | 11/4/14   | Alpine Community Planning Group (Travis Lyon)  |
| D4                        | 11/4/14   | Backcountry Against Dumps (Donna Tisdale)  |
| D5                        | 11/4/14   | Cleveland National Forest Foundation (Duncan McFetridge)   |
| D6                        | 11/4/14   | Protect Our Communities Foundation (Kelly Fuller)  |
| D7                        | 11/4/14   | San Diego Sierra Club (Cindy Buxton)   |
| D8                        | 11/4/14   | San Diego Sierra Club (Cindy Buxton)   |
| <b>E</b>                  | <b><i>Applicant</i></b>   |  |
| E1                        | 11/3/14   | San Diego Gas & Electric Company (David Geier)   |
| <b>F</b>                  | <b><i>Individuals</i></b>   |  |
| F1                        | 9/6/14  | Cindy Buxton   |
| F2                        | 10/3/14   | Gary Hoyt  |
| F3                        | 10/6/14   | William and Shannon Davis  |
| F4                        | 10/22/14  | Steve Green  |
| F5                        | 10/27/14  | Sandra Wilson  |
| F6                        | 10/30/14  | Gerald Fisher  |
| F7                        | 10/30/14  | Maegan McCoy (Martin)  |
| F8                        | 10/30/14  | Helen Joan McCoy-Anderson, Trustee Charles E McCoy Trust   |

## Index of Commenters on the Draft EIR/EIS

| <b>Comment Letter Designator</b> | <b>Date of Letter</b> | <b>Commenter</b>          |
|----------------------------------|-----------------------|---------------------------|
| F9                               | 10/30/14              | Jeanie Hawkins            |
| F10                              | 10/31/14              | Gerald Fisher             |
| F11                              | 11/3/14               | Nathan Weflen             |
| F12                              | 11/3/14               | Maegan McCoy (Martin)     |
| F13                              | 11/4/14               | William and Shannon Davis |
| F14                              | 11/4/14               | Richard Garner            |
| F15                              | 11/4/14               | Nathan Weflen             |

**A – FEDERAL AGENCIES/  
OFFICIALS**





UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

OCT 29 2014

Will Metz, United States Forest Service  
Cleveland National Forest  
605 Third Street  
Encinitas, California 92024

Subject: Proposed Master Special Use Permit and Permit to Construct Power Line Replacement Projects  
Joint Draft Environmental Impact Report/Draft Environmental Impact Statement, San Diego and Orange  
Counties, CA (CEQ#20140246)

Dear Mr. Metz:

The U.S. Environmental Protection Agency has reviewed the Joint Draft Environmental Impact Report/Environmental Impact Statement for the proposed Master Special Use Permit and Permit to Construct Power Line Replacement Projects pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated the Draft EIS as *Lack of Objections* (LO). Please see the enclosed "Summary of EPA Rating Definitions." To assist in providing improved analyses and additional disclosure in the Final EIS, our detailed comments include recommendations to ensure compliance with Clean Water Act Section 404, consideration of air quality impacts from potential helicopter use, and mitigation of potential impacts to tribal and cultural resources.

We appreciate the opportunity to review this Draft EIS and are available to discuss our comments. Please send a hard copy of the Final EIS to this office (Mail Code: ENF-4-2) when it is officially filed with EPA's new electronic EIS submittal tool: *e-NEPA*. If you have any questions, please contact me at (415) 972-3521, or contact Scott Sysum, the lead reviewer for this project, at (415) 972-3742 or [sysum.scott@epa.gov](mailto:sysum.scott@epa.gov).

Sincerely,

*For* 

Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosures:

- (1) Summary of EPA Rating Definitions
- (2) EPA's Detailed Comments

## **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement.

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***“LO” (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***“EC” (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***“EO” (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***“EU” (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. The EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality.

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category “1” (Adequate)***

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***Category “2” (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***Category “3” (Inadequate)***

The EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

**US EPA DETAILED COMMENTS ON THE JOINT DRAFT ENVIRONMENTAL IMPACT REPORT/  
ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED MASTER SPECIAL USE PERMIT AND  
PERMIT TO CONSTRUCT POWER LINE REPLACEMENT PROJECTS, SAN DIEGO AND ORANGE  
COUNTIES, CA, OCTOBER 28, 2014**

Aquatic Resources

*Geographic Extent of Waters of the United States and Section 404(b)(1) Guidelines*

The purpose of the Clean Water Act is to restore and maintain the chemical, physical, and biological integrity of WUS. These goals are achieved, in part, by prohibiting discharges of dredged or fill material that would result in avoidable or significant adverse impacts on the aquatic environment. Pursuant to Section 404 of the CWA, discharge of dredged or fill material to WUS requires a permit issued by the Army Corps of Engineers. If a permit is required, the EPA will review the project for compliance with the Federal Guidelines for Specification of Disposal Sites for Dredged or Fill Materials (40 CFR 230) (Guidelines), promulgated pursuant to Section 404(b)(1) of the CWA. The Guidelines presume that practicable alternatives to discharges in special aquatic sites exist for non-water dependent projects, unless clearly demonstrated otherwise.

According to the Draft Environmental Impact Statement, an assessment of potential jurisdictional WUS for all project areas was not conducted (p. D.4-6). A formal jurisdictional delineation would be required prior to project implementation by the various regulatory agencies to determine if permitting would be necessary. The Draft EIS also states that project activities in drainage and wetland feature areas will be carried out under non-notifying Nationwide Permit No. 12 (NWP 12) issued by ACOE, and a 401 Certification from the Regional Water Quality Control Board (Certification 11C-114; Categorical Exemption) (p. D.4-119). Permanent impacts to WUS associated with pole removal and replacement are approximately 26.8 square feet (< 0.001 acre). Temporary impacts to WUS and streambeds affect 0.21 acre. Compensatory mitigation was not required. We also note that sensitive biological communities including southern riparian forests, freshwater seep/open water, and wet montane meadows occur within the proposed power line replacement project area (p. D.4-16).

The extent of direct and indirect impacts to WUS cannot be determined without completion of a jurisdictional delineation. This information is necessary in order to ensure that only the Least Environmentally Damaging Practicable Alternative (LEDPA) is authorized by the ACOE as required by the Guidelines. It is unclear how the Draft EIS can conclude that impacts to waters will be authorized under a non-notifying NWP 12, without an approved jurisdictional delineation. While NWP 12 authorizes discharges of dredged or fill material into WUS associated with utility line activities, there are limits on the extent of discharge authorized under NWP 12, as well as conditions requiring pre-construction notification to the district engineer prior to commencing the activity (33 CFR Part 330).

Given the scale and nature of the action, a planning level assessment of aquatic resources will help identify the environmentally preferred alternative. This evaluation includes utilization of existing water resource data contained in the National Hydrography Dataset, National Wetland Inventory, USGS topographic maps and high resolution digital photography, as well as necessary field checking of the

alternatives. Once the environmentally preferred alternative is identified, a jurisdictional delineation should be conducted prior to final design of the selected transmission line alignment. With a jurisdictional delineation, the applicant can use the design flexibility inherent in transmission line design (e.g., adjust tower placement and access roads) to demonstrate the alignment is the LEDPA, in compliance with the Guidelines.

*Recommendations:*

Discuss, in the Final EIS, the process to be used to demonstrate compliance with the CWA Section 404 (b)(1) Guidelines.

The EPA recommends that the United States Forest Service require completion of a planning level assessment for potential impacts to WUS prior to issuance of the Final Environmental Impact Statement.

The Final EIS should state CWA Section 404 permit authorization will be obtained for any discharges into waters as it is premature to conclude impacts will be authorized under NWP 12.

The EPA recommends that the Final EIS include additional measures to further minimize of impacts to aquatic resources, such as, reducing the width of access roads and constructing bridges over WUS.

*Ephemeral Washes and Other Aquatic Resources*

The Final EIS should include additional detailed information on the function and acreage of ephemeral washes that may be impacted. Natural ephemeral washes perform a diversity of hydrologic and biogeochemical functions that directly affect the integrity and functional condition of higher-order waters downstream. Healthy ephemeral waters with characteristic plant communities control rates of sediment deposition and dissipate the energy associated with flood flows. Ephemeral washes also provide habitat for breeding, shelter, foraging, and movement of wildlife. Many plant populations are dependent on these aquatic ecosystems and adapted to their unique conditions. Potential damage that could result from disturbance of flat-bottomed washes includes alterations to the hydrological functions that natural channels provide in arid ecosystems: adequate capacity for flood control, energy dissipation, and sediment movement, as well as impacts to valuable habitat for desert species.

*Recommendations:*

The FEIS should quantify the likely impacts to ephemeral streams from the proposed project, for each project alternative, and discuss potential mitigation.

The Final EIS should commit to avoiding, if possible, or minimizing direct and indirect impacts to ephemeral streams (such as erosion, migration of channels, and local scour).

## Air Quality

The Draft EIS describes the formation of ozone from nitrogen oxides and volatile organic compounds in the presence of ultraviolet radiation, and states that ideal conditions for ozone formation occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. We note that helicopters may be used to deliver and remove construction material and personnel from areas with rugged terrain and where ground access would not safely accommodate the required construction equipment and vehicles (p. B-42). The EPA recommends the consideration of scheduling of heaviest helicopter usage during the fall and winter months when ozone formation is lowest. We also recommend the best available control technologies be used to reduce helicopter emissions.

### *Recommendations:*

The Final EIS should consider minimizing helicopter construction during the spring and summer months and discuss the feasibility of scheduling the heaviest helicopter use during the fall and winter when ozone production is the lowest. Quantify the potential benefits to air quality and discuss whether impacts to other resources could result from construction during cooler, and potentially wetter, months.

Identify, and commit to using, the best available control technologies to reduce helicopter emissions.

## Cultural Resources and Coordination with Tribal Governments

It is important that effective tribal consultation continue to occur, and the EPA commends the USFS on its consultation efforts conducted so far. Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes.

### *Recommendation:*

The Final EIS should discuss how any concerns raised by the Tribes were addressed and resolved. Provide an update on the status of the coordination with the Tribes and whether it is still ongoing. We recommend that any measures to reduce impacts to tribal and cultural resources that are developed be identified in the Final EIS and adopted in the Record of Decision.





# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Pacific Southwest Region  
333 Bush Street, Suite 515  
San Francisco, CA 94104

IN REPLY REFER:  
(ER 14/0578)

*Filed Electronically*

4 November 2014

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest  
c/o Dudek  
605 Third Street  
Encinitas, CA 92024

Subject: Master Special Use Permit and Permit to Construct Power Line Replacement  
Projects Joint Draft Environmental Impact Report/Draft Environmental Impact  
Statement (DEIR/DEIS) Orange and San Diego Counties, California

Dear Ms. Orsaba and Mr. Metz:

Thank you for the opportunity to comment on the Draft Environmental Impact  
Statement/Environmental Impact Report (DEIS/EIR) for the Master Special Use Permit and  
Permit to Construct Power Line Replacement Projects in Orange and San Diego Counties,  
California. We have the following comments to assist your preparation of the Final EIS.

This project would involve combining over 70 individual use permits and easements for San  
Diego Gas and Electric facilities within the Cleveland National Forest into one Master Special  
Use Permit to be issued by the U.S. Forest Service. In addition, San Diego Gas and Electric  
proposes to replace some power lines located within and outside the Cleveland National Forest.  
Replacement would primarily include fire hardening (wood-to-steel pole replacement),  
relocation, and undergrounding. The DEIS/EIR evaluates 11 alternatives including No Action  
and No Project alternatives.

Based on our review of the DEIS/EIR, we request a meeting with the Forest Service, California  
Public Utilities Commission, and San Diego Gas and Electric to discuss the protective measures  
planned for golden eagles (*Aquila chrysaetos*), bald eagles (*Haliaeetus leucocephalus*), and  
migratory birds to reduce electrocutions, collisions and disturbance during construction  
activities. You indicate in your document that coordination will occur between our agencies to  
identify the high use flyways and appropriate minimization measures. We would like discuss  
these issues and help ensure that you have the most up to date information regarding the  
locations of bald and golden eagles and migratory birds. We would also like to discuss the  
relationship of San Diego Gas and Electric's existing Subregional Natural Community

Conservation Plan/Habitat Conservation Plan of 1995 with the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act.

Page D.4-143. The flight season for the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*) is described in the DEIS/EIR as occurring from June 1 to October 15. However, the flight season for this species usually occurs from late January to early May, depending on weather conditions (USFWS 2003<sup>1</sup>).

We appreciate the opportunity to comment on the DEIS/EIR. If you have any questions regarding this letter, please contact Jesse Bennett at the Carlsbad Fish and Wildlife Office at 760-431-9440 extension 305.

Sincerely,

A handwritten signature in black ink that reads "Patricia Sanderson Port". The signature is written in a cursive, flowing style.

Patricia Sanderson Port  
Regional Environmental Officer

cc: OEPC Staff Contact: Lisa Treichel, (202) 208-7116, [Lisa\\_Treichel@ios.doi.gov](mailto:Lisa_Treichel@ios.doi.gov)  
Jesse Bennett, Carlsbad Fish and Wildlife Office, [jesse\\_bennett@fws.gov](mailto:jesse_bennett@fws.gov)

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<sup>1</sup>USFWS (U.S. Fish and Wildlife Service). 2003. Recovery plan for the Quino checkerspot butterfly (*Euphydryas editha quino*). Portland, Oregon. X + 179 pp.

**B – STATE AND LOCAL  
AGENCIES/OFFICIALS**



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

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SAN DIEGO, CA 92110

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FAX (619) 688-4299

TTY 711

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September 17, 2014

11-SD-VAR  
PM VAR  
DEIR / SCH #2013091070  
SDG&E MSUP & PTC Power Line ReplacementMs. Lisa Orsaba  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Dear Ms. Orsaba:

The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (DEIR) for the proposed San Diego Gas and Electric (SDG&E) Master Use Permit (MSUP) project (SCH #2013091070). Caltrans has the following comments:

The DEIR identifies that the project is proposing to replace certain existing power and distribution lines. If any work is performed within Caltrans right-of-way (R/W) an encroachment permit will be required. Please refer to Caltrans Encroachment Permits Manual ([http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment\\_permits\\_manual/index.html](http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html)) for guidance on utility encroachment.

Guidance for utility encroachment is contained in Chapter 600, Table 6.7 (page 6-35) of the Encroachment Permit Manual. Line supports for overhead lines crossing Caltrans R/W must comply with these requirements.

Any traffic control for utility work will need to be addressed as part of Caltrans permit approval. Stoppage of traffic for placement of aerial lines, installation or removal of overhead conductors crossing a highway requires traffic control in accordance with policy shown in the Caltrans Standard Plans and the California Manual on Uniform Traffic Control Devices (MUTCD).

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.

As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. 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

Ms. Lisa Orsaba  
September 17, 2014  
Page 2

permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

If you have any questions on the comments Caltrans has provided, please contact Roger Sanchez of the Development Review Branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Development Review Branch



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

October 21, 2014

Lisa Orsaba  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Subject: SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects  
SCH#: 2013091070

Dear Lisa Orsaba:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 20, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2013091070  
**Project Title** SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement  
**Lead Agency** Projects  
Public Utilities Commission

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**Type** EIR Draft EIR  
**Description** SDG&E's proposed MSUP/PTC Power Line Replacement Projects would consolidate over 70 existing special use permits for SDG&E facilities within the Cleveland National Forest (CNF) into one MSUP to be issued by the Forest Service. The MSUP would allow the continued operation and maintenance of approximately 102 miles of SDG&E's existing 69 kV transmission line (TL) also referred to as power lines, 12 kV circuits (C) also referred to as distribution lines and ancillary facilities, as well as approximately 34 miles of existing access roads require to maintain and operate SDG&E electric facilities within the CNF.

---

**Lead Agency Contact**

**Name** Lisa Orsaba  
**Agency** California Public Utilities Commission  
**Phone** 415 703 1966  
**email**  
**Address** 505 Van Ness Avenue  
**City** San Francisco  
**State** CA **Zip** 94102-3298  
**Fax**

---

**Project Location**

**County** San Diego, Orange  
**City** Pauma Valley  
**Region**  
**Lat / Long**  
**Cross Streets** Multiple  
**Parcel No.** Multiple  
**Township** **Range** **Section** **Base**

---

**Proximity to:**

**Highways** I-8, SR-76, 78, 79  
**Airports**  
**Railways**  
**Waterways** Various  
**Schools** Various  
**Land Use** Various

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**Project Issues** Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Caltrans, District 12; Air Resources Board; Regional Water Quality Control Board, Region 9; Native American Heritage Commission

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**Date Received** 09/04/2014 **Start of Review** 09/04/2014 **End of Review** 10/20/2014

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

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10/20/14  
Y



September 17, 2014

11-SD-VAR  
PM VAR

DEIR / SCH #2013091070

SDG&amp;E MSUP &amp; PTC Power Line Replacement

Ms. Lisa Orsaba  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Dear Ms. Orsaba:

The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (DEIR) for the proposed San Diego Gas and Electric (SDG&E) Master Use Permit (MSUP) project (SCH #2013091070). Caltrans has the following comments:

The DEIR identifies that the project is proposing to replace certain existing power and distribution lines. If any work is performed within Caltrans right-of-way (R/W) an encroachment permit will be required. Please refer to Caltrans Encroachment Permits Manual ([http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment\\_permits\\_manual/index.html](http://www.dot.ca.gov/hq/traffops/developserv/permits/encroachment_permits_manual/index.html)) for guidance on utility encroachment.

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Any traffic control for utility work will need to be addressed as part of Caltrans permit approval. Stoppage of traffic for placement of aerial lines, installation or removal of overhead conductors crossing a highway requires traffic control in accordance with policy shown in the Caltrans Standard Plans and the California Manual on Uniform Traffic Control Devices (MUTCD).

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.

As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. 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

Ms. Lisa Orsaba  
September 17, 2014  
Page 2

permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

If you have any questions on the comments Caltrans has provided, please contact Roger Sanchez of the Development Review Branch at (619) 688-6494.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Armstrong', written over a light blue horizontal line.

JACOB ARMSTRONG, Branch Chief  
Development Review Branch



THE CITY OF SAN DIEGO

October 27, 2014

Ms. Lisa Orsaba, California Public Utilities Commission  
Mr. Will Metz, Forest Service Supervisor, Cleveland National Forest  
C/o Dudek  
605 Third Street  
Encinitas, CA 92024

Dear Ms. Orsaba and Mr. Metz:

Subject: Draft EIR/EIS, SDG&E Master Permit: Application No. A.12-10-009;  
SCH No. 2013091070; Forest Service Publication No. R5-MB-277

We have reviewed the Draft Environmental Impact Report and Environmental Impact Statement (DEIR/EIS), dated August 2014, and appreciate the opportunity to comment.

The three alignments that cross City-owned properties are: Alignment C157 (Barrett Reservoir), Alignment T625 (north of Barrett Reservoir) and Alignment C449 (Morena Reservoir). The City's issues-of-concern were outlined in two previous comment letters responding to the Notice of Preparation (November 13, 2013 and March 7, 2014). All of these issues have been addressed in the document. Additional comments are provided below:

1. Alignment C157 (Barrett Reservoir)

Several alignments were evaluated and the document concluded "Option 2, City of San Diego Modified Alignment" is both the CEQA Environmentally Superior alignment and the NEPA Environmentally Preferred alignment. The City strongly supports this Option.

The City of San Diego's jurisdiction should be clearly identified on all pertinent figures to further demonstrate the importance of this particular alignment. Although the Executive Summary (Section ES) and the Comparison of Alternatives (Section E) discloses this issue, similar information should also be presented in Land Use and Planning (Section D.10) and Recreation (Section D.13) identifying the City of San Diego's land use authority and responsibilities along a portion of Alignment C157's proposed alternate route on City-owned property.

Add the following sentence to Cultural Resources Mitigation Measure MM CUL-3 (Page D.49):

When on City-owned land, the City's Land Development Manual – Historical Resource Guidelines per the San Diego Municipal Code, Chapter 14, Article 3, Division 2. Section 14.0201, shall be followed. See:

<http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division02.pdf>

**Public Utilities Department**

525 B Street, Suite 300, MS 906 • San Diego, CA 92101-4409

Tel (619) 533-7595



Page 2  
Ms. Lisa Orsaba  
Mr. Will Metz  
October 27, 2014

2. Alignment T625 (North of Barrett Reservoir)

The highly invasive Yellow Star Thistle (*Centaurea solstitialis*) is known to occur along a segment of Alignment T625 where it traverses City-owned land (Figure B-5) between the Barrett Substation and Barrett Tap. In Section D.4 Biological Resources, discuss and analyze how project implementation could potentially exacerbate the potential spread of this highly invasive species

3. Alignment C440 (Morena Reservoir)

Include a short sentence or two in Section D.13 Recreation (Page D.13-2) clarifying that the County of San Diego has a long-term lease with the City of San Diego for recreational uses at Morena Reservoir. Project implementation could necessitate modification to this lease which is considered discretionary actions under CEQA, making the City a Responsible Agency.

4. Access Routes

The access routes that are pre-determined must be delineated by markers or signs and the delineating markers should be maintained on a regular basis. This matter can be addressed on pages D.4-146 and added as a mitigation measure to MM-BIOI 22 or 24.

The City respectfully requests the above topics be addressed in the Final EIR/EIS and a copy of this document be sent to our office to:

Jeffery Pasek, Watershed Manager  
Public Utilities Department, City of San Diego  
525 B Street, Suite 300, MS 906  
San Diego, CA 92101-4409

If you have any comments, please contact Kim Wehinger, Natural Resources Planner, at 619-533-5222.

Sincerely,



for Jeffery Pasek  
Watershed Manager

JP/am

cc: Kerry Santoro, Assistant Deputy Director, Development Services Department  
Martha Blake, Associate Planner, Development Services Department  
Jeanne Krosch, Senior Planner, Development Services Department

RMS: 7.1



DEPARTMENT OF PARKS AND RECREATION  
COLORADO DESERT DISTRICT  
200 PALM CANYON DRIVE  
BORREGO SPRINGS, CA 92004  
760-767-4037

Lisa Ann L. Mangat, Acting Director

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest  
c/o Dudek  
605 Third Street  
Encinitas, California 92024

November 3, 2014

Dear Ms. Orsaba and Mr. Metz:

This letter serves as California Department of Parks and Recreation's (CDPR's) comment on the Draft Environmental Impact Report/Environmental Impact Statement Master Special Use Permit and Permit to Construct Power Line Replacement Projects (DEIR/DEIS MSUP/PTC) as proposed by the San Diego Gas & Electric Company (SDG&E or applicant).

CDPR recognizes the value of undergrounding the C79 12kV line under Look Out Road in order to increase fire safety, improve public safety by providing reliable power to the Cuyamaca Peak communications site and improve visual aesthetics of CDPR lands as a result of the removal of above ground transmission lines on the west side of Cuyamaca Peak. However, as discussed below, the current DEIR/DEIS MSUP/PTC is not compliant with a full CEQA review on CDPR lands and, as such, CDPR suggests removing all activities associated with the C79 relocation, removal, and undergrounding on Cuyamaca Rancho State Park (CRSP) property from the MUSP/PTC application at this time.

The following discussion highlights CDPR's specific comments on the MSUP/PTC DEIR/DEIS, beginning with a description of the work being proposed in CRSP, CDPR comments and concerns regarding the CEQA review, additional CDPR concerns regarding the proposed work, and requirements that must be adhered to in the event that compliance with CEQA for the proposed work on CDPR property is achieved.

### **I. Description of Proposed Project**

The MSUP/PTC project proposes work on the C79 distribution circuit that currently traverses California Department of Parks and Recreation (CDPR) land as well as proposes the undergrounding of a new segment of the line beneath Look Out Road. The specific project work regarding the 12 kV Distribution Circuit C79 is outlined on pages B-18 and B-19, section B.3.1.6 of the MSUP/PTC project description as follows:

#### **Route Description**

As shown in Figures B-2 and B-4, the existing 12 kV distribution circuit (C)79 is located approximately 5 miles north of the community of Descanso in central San Diego County. C79 is approximately 2.2 miles in length and runs from its intersection with [transmission line]TL626 east to the Cuyamaca Peak communication site within Cuyamaca Rancho State Park.

#### **Project Components**

As illustrated in Figure B-4, reconstruction of C79 would include removal of existing overhead line and replacement with new relocated underground segment.

- **Removal:** As shown in Figure B-4, the existing 2.2-mile overhead C79 from its intersection with TL626 to the Cuyamaca Peak communication site would be removed. Sixty-four existing wood poles (from pole P377371 to pole P377405 and from pole P676926 to pole P377414) would be removed and replaced with a new underground segment as described below.
- **Undergrounding:** The existing overhead C79 proposed for removal would be replaced with a new approximately 2.8-mile underground 12 kV circuit through Cuyamaca Rancho State Park from the Cuyamaca Peak communication site west in Lookout Road where it would connect to an existing overhead 12 kV distribution circuit via a new 45-foot-tall riser pole on the eastern side of SR-79 (see Figure B-13, Proposed Distribution Riser Pole). Underground cables would be installed in a 1.5-foot-wide by 1.5-foot-deep ducts bank. Approximately 19 splice vaults would also be installed along the new underground segment. Splice vaults would be approximately 5.5 feet wide by 8 feet long by 7 feet deep.
- **Access Roads:** Removes 4.2 miles of existing access roads maintained by SDG&E to provide access to C79 (see Table B-8). Undergrounding would be located in Lookout Road, and therefore existing access roads would be used to support construction and O&M. No new access roads are proposed.

## II. CDPR Comments and Concerns

CDPR recognizes the applicant's need for the power line replacement project which includes removal, relocation, and undergrounding of the 12kV C79 distribution line. However, CRSP property and associated resources are under the protection of the CDPR and as such, CDPR must ensure that thorough review of the proposed activities and impacts occurs.

As the lead agency for the California Environmental Quality Act for California State Parks lands, CDPR requires that all aspects of a full CEQA review be complete prior to issuing any permits to the applicant including, but not limited to, a Right of Entry permit and an Easement Agreement. Unfortunately, a thorough review of the application and supporting materials indicates that the SDG&E's MSUP/PTC application does not meet the requirements for a full CEQA review on CDPR lands.

The following list details specific CEQA concerns by category:

### Biological Resources

#### On-site Surveys

While literature reviews were extensive, raw GIS data, provided to the public during the comment period, indicates that actual site visits to the vicinity of Look Out Road in Cuyamaca Rancho State Park were apparently not conducted. The following list of source data for biological resource (rare, threatened, endangered plant and animal species) occurrences within 150ft of the project site along the C79 corridor and proposed undergrounding work area was generated from the raw GIS data which the CNF Biological Technical Report was based upon. This data can be found in the 45<sup>th</sup> column (column AS) of the Biological Technical Report raw. Of the 346 species that may occur within 150ft of the project area, the raw data indicates that additional fieldwork or surveys are needed to verify the presence or absence of 181 species. An additional 150 species were assessed based solely upon literature reviews and no mention of the

need for further fieldwork was mentioned. The list is reproduced below. No other data could be found indicating that follow up surveys and/or additional field work were completed in Cuyamaca Rancho State Park.

| Number of Species Source Data referred to | GENERAL [Description of Source Data]  |
|---|---|
| 2   | RARE WITH JUST A FEW PLANTS IN 1980. AREA SEARCHED IN 1983 AND PLANTS NOT FOUND.  |
| 7   | 1994 USFS REPORT INCLUDES NEW MAP FOR THIS EO, UNKNOWN WHEN PLANTS WERE OBSERVED.   |
| 23  | MAIN SOURCE OF INFORMATION FOR THIS SITE IS "RARE, ENDANGERED, AND SPECIAL STATUS PLANTS OF CUYAMACA RANCHO STATE PARK" BY WIER AND HIRSCHBERG (1983).  |
| 14  | MAPPED LOCATION IS BEST GUESS AS TO WHERE PLANTS WERE FOUND; NO ELEVATION GIVEN ON HERB LABEL. <b>SURVEYS NEEDED.</b>   |
| 2   | MVZ #59771.   |
| 97  | ONLY SOURCE OF INFORMATION FOR THIS OCCURRENCE IS AN 1875 COLLECTION BY PALMER. <b>NEEDS FIELDWORK.</b>   |
| 70  | ONLY SOURCE OF INFORMATION FOR THIS OCCURRENCE IS SITE NAME NOTED BY REISER IN "RARE PLANTS OF SAN DIEGO COUNTY" (1994).  |
| 8   | ONLY SOURCE OF INFORMATION FOR THIS SITE IS A 1988 HIRSHBERG COLLECTION.  |
| 7   | SEE <a href="http://WWW.DFG.CA.GOV/BIOGEODATA/VEGCAMP/NATURAL_COMM_BACKGROUND.ASP">WWW.DFG.CA.GOV/BIOGEODATA/VEGCAMP/NATURAL_COMM_BACKGROUND.ASP</a> TO INTERPRET AND ADDRESS THE PRESENCE OF RARE COMMUNITIES. |
| 70  | SITE BASED ON A VAGUE, UNDATED COLLECTION BY BRANDEGEE. AN 1894 BRANDEGEE COLLECTION FROM "CUYAMACA" IS ALSO ATTRIBUTED TO THIS SITE. <b>NEEDS FIELDWORK.</b>   |
| 6   | SITE BASED ON TWO COLLECTIONS FROM HIRSHBERG FROM 1989 AND 1993.  |
| 36  | THIS IS NEAR THE MIDDLE OF THE LARGE POPULATION AREA WHICH EXTENDS FROM JAPACHA PEAK TO CHERRY FLAT (WIER BIOLOGICAL 1983).   |
| 1   | THIS IS THE NORTHERN END OF THE LARGE POPULATION AREA WHICH EXTENDS FROM JAPACHA PEAK TO CHERRY FLAT (WIER BIOLOGICAL 1983).  |

|   |   |
|---|---|
| 2 | THIS IS THE TYPE LOCALITY FOR THE SPECIES. HOLOTYPE DEPOSITED IN SANTA BARBARA MUSEUM OF NATURAL HISTORY; PARATYPES AT ANSP, USNM, W.B. MILLER AND R.L. REEDER COLLECTIONS. |
|---|---|

Additionally, the CDPR GIS database also contains records of physically verified listed species within the 150ft and within the five mile radius of the project area that the CNF Biological Technical Report does not identify. Even though CDPR's GIS database identifies additional biological resources, the full proposed project area has not been surveyed.

Thus the biological resources data, presented by the applicant as verification of their compliance with a CEQA review, is not adequate. On-site biological resources surveys must be conducted along the entire proposed project site within Cuyamaca Rancho State Park.

#### Protection of Genetic Stock

An additional biological concern is related to the recent history of the ecosystem on Cuyamaca Peak. In 2003, about 98% of Cuyamaca Rancho State Park was burned in the catastrophic Cedar Fire and greater than 95% of the montane conifer forest was destroyed, leaving minimal potential for natural regeneration of the forest. The proposed project site runs through the last remaining sugar pine stand in San Diego County, which exists as a "Sky Island" forest at the top of Cuyamaca Peak. This stand is the main source of naturally regenerating conifers in the park and is also a seed source for a reforestation effort in the park. The potential locations of staging and stringing, etc. sites are proposed within this approximately 60-acre mature montane forest canopy. The applicant states that staging sites will be located on "already disturbed land", yet there is no "disturbed land", of the dimensions the applicant is requesting, in the vicinity of this remaining Sky Island canopy. State Parks will not allow the removal of mature trees in this vulnerable ecosystem. See below for potential alternative staging and stringing sites.

#### **Cultural Resources Review**

CDPR can confirm that upon comparison of the CNF Cultural Resources Technical Report narrative to the CDPR's GIS database of physically verified cultural resources data it is apparent that the applicant's cultural surveys of the project area are incomplete. The data presented as verification of compliance with a CEQA review, is not adequate. Please note that while CDPR's GIS data is more complete than the applicant's, CDPR's cultural resources staff have not surveyed the applicant's entire proposed project area. A thorough cultural resources survey, conducted by a CDPR approved archeologist, must be completed prior to issuing any permit to the applicant.

#### **Wilderness Area Incursion**

The purpose of the Cuyamaca Mountains State Wilderness designation is to provide maximum resource protection of the forested slopes and peaks within Cuyamaca Rancho State Park and to preserve the wilderness experience of visitors in these areas. In general, wilderness areas have sparse numbers of visitors due to the remote and steep nature of the terrain, lack of vehicles

access, and their distance away from parking and other developments. As such, this area of the Park offers many opportunities for quiet and solitude.

Though specific GIS data regarding the location of staging and stringing, etc. sites will not be available until closer to construction time, application maps indicate the potential location of some of these sites on the east side of Cuyamaca Peak within the Cuyamaca Mountains State Wilderness area. Undergrounding work includes blasting as well as potential work at night when lights will be required. Additionally, the applicant proposes removal of poles and an access road on the west side of Cuyamaca Peak.

The designated Cuyamaca Mountains Wilderness Area, per the PRC (Div. 5 ch.1.3 sec. 5093), does not allow for motorized vehicle or mechanical conveyance access. In rare instances when CDPR allows a mechanized incursion into a state designated Wilderness Area, a 4351 1 (c) Minimum Tool Analysis is required to ensure that all alternatives are thoroughly reviewed and actions are taken to minimize impact to resources and visitor experience. In addition CDPR will require a recommendation by a CDPR Registered Professional Forester, hydrologic review and recommendations by a CDPR geologic engineer, the Colorado Desert District Superintendent approval, and final approval of the Deputy Director of Park Operations. The applicant has not started the process for seeking approval to work in a State designated Wilderness Area.

### **CEQA Review Conclusions**

The above list of concerns is not exhaustive; however, they are compelling reasons for CDPR to require the applicant to complete a thorough CEQA review prior to commencing any project work on CDPR property.

### **III. Additional Concerns**

#### Forest Carbon Sequestration Project Area

The applicant proposes locating staging and stringing sites within the project area of an ongoing forest ecosystem restoration project, which is registered with the Climate Action Reserve. Many saplings are already established in this reforestation project area and tracking of carbon sequestration has already begun. Avoidance of these reforestation sites, many of which are in Wilderness, is required.

#### Access to the Peak

The communications site at the top of Cuyamaca Peak is a matter of public safety and full accessibility to the site is required. The applicant proposes a tentative 10 month work schedule for removal, relocation, and undergrounding work on C79. The applicant's MSUP/PTC DERI/DEIS does not specifically address accommodating full access to the Communications site.

#### North Spur of Look Out Road

As all current communications infrastructure is located at the top of Cuyamaca Peak, at the south spur of Look Out Road, CDPR believes that no work is necessary to supply power to the north spur. Therefore, CDPR expects that no undergrounding needs to occur along this portion of Look Out Road.

#### **IV. Requirements**

The following requirements must be met as a condition of CDPR issuing any permits to the applicant:

1. The applicant must comply with all aspects of a CEQA review.
  - a. CDPR's State Representative or State Representative's designee will oversee the applicant's compliance with CEQA including pre-approval of survey methodologies and qualified researchers
  - b. CDPR will have full access to all GIS raw survey data
3. A CDPR archeologist and/or Native American monitor, paleontologist, biologist and/or other State Park representative's designee will be on-site, at the applicant's expense, to oversee all project operations.
4. A 4351 1 (c) Minimum Tool Analysis must be completed to ensure that all alternatives to entering the Wilderness are thoroughly reviewed and actions are taken to minimize impact to resources and visitor experience. CDPR will require a recommendation by
  - a. A CDPR Registered Professional Forester
  - b. The Colorado Desert District Superintendent approval
  - c. Final approval of the CDPR Deputy Director, Park Operations
5. Final determination of all staging, trenching, stringing, etc. sites will rest with State's representative or State's representative designee, who will flag the area that has been determined acceptable for temporary disturbance.
6. In the event that an artifact or other significant finding occurs, within any area associated with the project work, all work will desist and appropriate State Parks personnel will be notified. Project work will not resume until State Park's representative has determined an acceptable plan of action to ensure the preservation and/or protection of resources.
7. The project work will be completed in pre-approved stages with an on-site work activity schedule that is compliant with Migratory Bird Treaty Act and other CDPR operations. The work schedule will need to occur in phases of three to four months at a time over a period of three years.
8. Throughout the estimated 10 months of project work during which undergrounding will occur, Look Out Road must remain open for full vehicle access all the way to the Cuyamaca Peak communications site.
  - a. A work schedule will be negotiated with State's Representative prior to commencing undergrounding work.
  - b. Any changes to the work schedule will be coordinated in advance with State's representative.
9. No nighttime work will be conducted. The DEIR/DEIS suggests allowing two hours of nighttime work during which additional lighting will be used. As the proposed work area is immediately adjacent to wilderness areas and in close proximity to a visitor campground, blasting and/or other loud noises, as well as lighting, would have a negative impact upon both park visitors and wildlife.
10. Prior to commencement of proposed project activities, the applicant will work with State's Representative to determine facilities infrastructure. Any damage to infrastructure is the responsibility of the applicant and timely repairs must be made. The costs of repairs are the responsibility of the applicant.

11. Upon completion of the project, the entire length of Look Out Road, from CA79 to the communications site at the top of Cuyamaca Peak, must be repaired and repaved.
12. Cuyamaca Peak is located at the headwaters of the Sweetwater River and San Diego River watershed. Road repairs and access road removal will accommodate for the adequate drainage and overall hydrology of the landscape to prevent erosion or adverse effects upon these watersheds.
13. Vegetation management: No mature trees will be cut. No mature trees or saplings on the Forest Carbon Sequestration project site will be cut. All other vegetation to be cut will be done so with hand tools and only with the consent of State's Representative.
14. No herbicides or pesticides will be used for vegetation management.
15. All other permits required for project work on CDPR property, including but not limited to the Right of Entry and an Easement Agreement will be negotiated separately with CDPR.
16. All restoration, re-vegetation activities, and re-contouring of any terrain will be under the control and direction of CDPR.

The mission of the CDPR is to provide for the health, inspiration, and education of the people of California by *helping to preserve the State's extraordinary biological diversity, protecting its most valued natural and cultural resources*, and creating opportunities for high-quality outdoor recreation (italics added).

To understand the implications of the actions that are undertaken within the boundaries of Cuyamaca Rancho State Park it is important to describe some of the laws, codes, and policies that underlie CDPR management actions. Many management actions for are required based on existing federal and state laws, codes, state executive orders, and CDPR Policies and Management Guidelines.

### **Regulatory Requirements and Departmental Policy Compliance**

The following are some of the most pertinent laws, codes and policies related to planning and managing CRSP:

#### **AIR QUALITY**

Cuyamaca Rancho State Park is a Class I air quality area under the Clean Air Act. Class I areas are afforded the highest degree of protection under the Clean Air Act. This designation allows very little additional deterioration of air quality.

Policy Guidance/Sources:

- Clean Air Act, 1970

#### **Management Strategies:**

1. Conduct air quality monitoring in conjunction with other governmental agencies
2. Monitor and document the condition of air quality and related values
3. Evaluate air pollution impacts and identify causes

4. Work to reduce emissions associated with administrative and visitor uses

## **CLIMATE CHANGE**

Numerous state and federal laws, policies, and guidelines have been enacted to reduce greenhouse gas emissions, mitigate for emissions, and sequester carbon in an effort to slow the rate of climate change.

### **Policy/Guidance Sources:**

- State Senate Bill 97  
Requires development of CEQA guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions.”
- California Executive Order S-03-05  
Establishes greenhouse gas emission targets, create the Climate Action Team, and directs the Secretary of Cal/EPA to coordinate efforts with meeting the targets with the heads of other state agencies.
- California Executive Order B-18-12  
Requires State Agencies to reduce overall greenhouse gas emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. It also requires all buildings built or undergoing major renovations after 2025 be constructed as Zero Net Energy facilities. Further, State Agencies shall continue to take action to reduce grid-based energy purchases by a least 20% by 2018.

## **CULTURAL RESOURCES**

Cultural resources embrace human values, ranging from the evidences of early people dating back more than 10,000 years to sites and buildings of people who are making history today. “History” as it is used by CDPR means the totality of human experience in California. Some of the federal and state laws, codes, and policies that are in place to help preserve, protect, and restore archaeological and historical resources are:

### **Policy Guidance/Sources:**

- Department Operations Manual (DOM) Chapter 0400  
Cultural resources and associated Departmental Notices are the basic policy document for the State Park System. Together, they guide the management of cultural resources under the jurisdiction of the Department.
- The Cultural Resources Management Handbook  
Provides CDPR guidelines and information pertaining to cultural resource management, operations, processes, and procedures.

## **RESOURCE MANAGEMENT DIRECTIVES SECTION 1832**

Directives (50) through (57) reflect the intent of Chapter 1.7 of Division V of the Public Resources Code relating to archaeological, paleontological, and historical sites; and of Senate Concurrent Resolution No. 43 of the 1963 legislative session, which relates to preservation of ancient Indian burial grounds, artifacts, and relics of Indian culture in California.

**PUBLIC RESOURCES CODE**

|                              |   |
|------------------------------|---|
| 5021.                        | Registration of State Landmarks and Points of Interest; publications of archaeological investigations                                   |
| 5024.                        | State-owned Historical Resources; policies to preserve; master list; documentation  |
| 5024.5.                      | State-owned Historical Resources; notice and summary of proposed actions to SHPO; mediation responsibility                              |
| 5097.                        | Archaeological, Paleontological and Historical sites definitions; state lands   |
| 5097.5.                      | Removal or Destruction; Prohibition   |
| 5097.7.                      | Upon a conviction pursuant to Section 5097.5, the following items are subject to forfeiture in accordance with the following conditions |
| 5097.9.                      | Native American Historical, Cultural and Sacred Sites; free exercise of religion; cemeteries, place of worship on ceremonial sites.     |
| 5097.99                      | Removal or Possession of Native American Remains  |
| 5097.991.                    | Repatriation. It is the policy of the state that Native American remains and associated grave artifacts shall be repatriated            |
| 21083.2.                     | Archaeological Resources  |
| 21084.                       | Guidelines shall list classes of projects exempt from Act   |
| 21084.1.                     | Historical Resources Guidelines   |
| GOVERNMENT CODE              |   |
| 6254.                        | Restriction of Archaeological Record Disclosure   |
| 6254.10.                     | Information maintained by Department of Parks and Recreation  |
| HEALTH AND HUMAN SAFETY CODE |   |

|            |   |
|------------|---|
| 7050.5.    | Removal of Human Remains  |
| 7052       | Mutilation, Disinterment, Removal of, or Sexual Contact with human remains  |
| PENAL CODE |   |
| 6221/2.    | <ul style="list-style-type: none"> <li>• Destruction, defacement of objects of archaeological or historical interest</li> </ul> |
| 623        | <ul style="list-style-type: none"> <li>• Destruction, removal, or defacement of natural or cultural material</li> </ul>         |

## **CALIFORNIA CODE OF REGULATIONS**

TITLE 14, DIVISION 3, CHAPTER 1: 4308. Archaeological Features

TITLE 14, DIVISION 6, CHAPTER 3: 15064.5. Determining the Significance of Impacts to Archaeological and Historical Resources

### **EXECUTIVE ORDER W-26-92**

Preservation, protection, restoration, maintenance of historical, architectural and archaeological resources.

### **EXECUTIVE ORDER B-10-11**

Consultation with Native American Tribes.

### **DEPARTMENTAL NOTICE NO. 2007- 05**

Consultation with Native Americans.

Management strategies:

1. Impacts to Cultural Resources will be avoided and/or mitigated.
2. Ongoing consultation and communication with the Kumeyaay, Kamia, and Kwaaymii will occur on a regular basis.
3. Archaeological Site Condition Assessment will be performed on a reoccurring basis, especially for those sites within or adjacent to public-use areas or that have a history of impacts from erosion, visitor use. Vandalism, etc. This assessment can be performed by trained Archaeological Site Stewards or a CDPR archaeologist. For those sites showing significant impacts or damages, protection and/or restoration measures will be undertaken.
4. A permit to conduct Archaeological Investigations/Collection (DPR 412A) will be required for any non-CDPR archaeologist or researcher conducting archaeological work including survey, testing, data-recovery, etc. within CDPR lands. Any data collected under such a permit remains confidential and the property of CDPR. Permittee must submit a summary of all data collected and provide CDPR with copies of documentation (photographs, notes, GPS data, etc.) and reports/records compiled with such data.

5. Archaeological collections will be curated in a facility that meets CDPR curation standards.

## **NATURAL RESOURCES**

Conservation and management of natural resources within CRSP are driven by multiple federal and state laws and statutes as well as CDPR policies and Mission.

### **Policy Guidance/Sources:**

- California Environmental Quality Act of 1970 (CEQA)
- National Environmental Quality Act of 1969 (NEPA) applies in addition to CEQA when Federal monies are used, such as through a grant or partnership agreement
- Endangered Species Act of 1973 (ESA) provides for the conservation of ecosystems upon which threatened and endangered species depend, authorizes the listing of species, and prohibits unauthorized take of endangered species.
- Bald and Golden Eagle Protection Act of 1940 prohibits the take, possession, and commence of bald and golden eagles.
- Migratory Bird Treaty Act of 1918 prohibits activities detrimental to migratory song birds such a “pursue, hunt, take, capture, kill” or attempt to do any of these actions. It also protects “any part, nest, or egg” of migratory birds.
- California Code of Regulations (CCR) is the official compilation and publication of the regulations adopted, amended or repealed by state agencies and have the force of law.
- Department Operations Manual (DOM) Chapter 0300 Natural Resources and associated Departmental Notices are the basic policy document for the State Park System. Together, they guide the management of natural resources under the jurisdiction of the Department.
- The Natural Resources Handbook supplements the DOM and contains specific information pertaining to resource management operations, processes, and procedures such as prescribed fire, wildfire, non-native species, and tree protection guidelines.

### **Management Strategies:**

1. Impacts to natural resources will be avoided and/or mitigated.
2. Vegetation Management Statement (VMS) will be adhered to. The VMS sets goals, objectives, and desired conditions for vegetation in the park.
3. Re-vegetation projects will only use plants of local genetic stock and any site stabilization materials will be Certified Weed Free.
4. Maintain a current Wildfire Management Plan.
5. A Scientific Collecting Permit (DPR065) may be required for conducting research studies, particularly for activities that require specimen collection, are located in proximity to sensitive natural or cultural resources, and/or have the potential to disturb visitors. The use of collected materials for commercial profit or personal benefit is

prohibited. Permittee must submit a summary of information gathered and make available to CDPR any published material as a result of the permit.

## **PHYSICAL RESOURCES**

### **Policy Guidance/Sources:**

- California Executive Order B-18-12  
Orders State agencies to reduce overall water use at the facilities they operate by 10% by 2015 and by 20% by 2020, as measured against a 2010 baseline.
- Clean Water Act (1972)  
Regulates discharges of pollutants into waters of the United States and regulates surface water quality standards. Requires a National Pollutant Discharge Elimination System (NPDES) permit to discharge any pollutant from a point source.

### **Management Strategies**

1. Promote native plants and xeric plants for landscaping of residences and facilities.
2. Maintain and/or re-route roads and trails that are unnaturally eroding, resulting in discharge of sediment to surface waters of the United States.
3. A Scientific Collecting Permit (DPR065) may be required for conducting research studies, particularly for activities that require specimen collection, are located in proximity to sensitive natural or cultural resources, and/or have the potential to disturb visitors. The use of collected materials for commercial profit or personal benefit is prohibited. Permittee must submit a summary of information gathered and make available to the CDPR any published material as a result of the permit.

## **UNIT CLASSIFICATIONS**

In addition to CDPR's Mission, classification recognizes a unit's resource significance and establishes the parameters for management and appropriate development as specified by PRC 5019.50-5019.80.

### **Classification – State Park**

Cuyamaca Rancho State Park was classified as a State Park (PRC 5019.53). The purpose is to preserve outstanding natural, scenic and cultural values and the most significant examples of ecological regions of California,

### **Sub-Classification – State Wilderness**

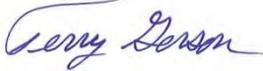
In addition to the State Park classification, the PRC establishes several categories of sub-classifications that may be included within the boundaries of a State Park. One of the Park's sub-classifications is Wilderness:

Wilderness – An area of relatively undeveloped state-owned land which has retained its primeval character and influence or has been substantially restored to a near-natural appearance without permanent improvements or human habitation, other than semi-improved campgrounds, or structures which existed at the time of classification of the area

as a state wilderness and which the State Park and Recreation Commission has determined may be maintained and used in a manner compatible with the preservation of the wilderness environment, which is protected and managed so as to preserve its natural conditions, and which:

- Appears generally to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable.
- Has outstanding opportunities for solitude or a primitive and confined type of recreation.
- Consists of at least 5,000 acres of land, either by itself or in combination with contiguous areas possessing wilderness characteristics, or is of sufficient size as to make practicable its preservation and use in an unimpaired condition.
- May also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Sincerely,



Terry Gerson  
Senior Park and Recreation Specialist  
Colorado Desert District



DEPARTMENT OF PARKS AND RECREATION  
COLORADO DESERT DISTRICT  
200 PALM CANYON DRIVE  
BORREGO SPRINGS, CA 92004  
760-767-4037

Lisa Ann L. Mangat, Acting Director

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest  
c/o Dudek  
605 Third Street  
Encinitas, California 92024

November 4, 2014

Subject: California Department of Parks and Recreation's (CDPR's) additional comment on the Draft Environmental Impact Report/Environmental Impact Statement Master Special Use Permit and Permit to Construct Power Line Replacement Projects (DEIR/DEIS MSUP/PTC)

Dear Ms. Orsaba and Mr. Metz:

The DEIR/DEIS MSUP/PTC incorrectly states that the proposed undergrounding of the C79 distribution circuit would run "west" from the Cuyamaca Peak communication site down Look Out Road. It should state "east" as corrected below in the text from the Undergrounding subsection of the Description of the Proposed Project which can be found on page B-18 beginning on line 4:

- **Undergrounding:** The existing overhead C79 proposed for removal would be replaced with a new approximately 2.8-mile underground 12 kV circuit through Cuyamaca Rancho State Park from the Cuyamaca Peak communication site ~~west~~ east in Lookout Road where it would connect to an existing overhead 12 kV distribution circuit via a new 45-foot-tall riser pole on the eastern side of SR-79....

This and all other erroneous references to the proposed C79 distribution circuit work sites in CRSP need to be corrected.

Additionally, Map B-4 found on page B-79 of the DEIR/DEIS MSUP/PTC incorrectly identifies the CDPR Cuyamaca Rancho State Park (CRSP) sector office as "Cuyamaca Peak Forest Station." The US Forest Service has no jurisdiction in Cuyamaca Rancho State Park. The office should be identified as the CDPR Colorado Desert District's (CDD) Montane Sector office. This map and all other erroneous references to CDPR CDD's Montane Sector office need to be corrected.

Sincerely,

Terry Gerson  
Senior Park and Recreation Specialist  
Colorado Desert District



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



November 4, 2014

Lisa Orsaba  
California Public Utilities Commission  
505 Van Ness Avenue,  
San Francisco, CA 94102

**Subject: Comments on the SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement, Draft Environmental Impact Report, San Diego and Orange Counties (SCH# 2013091070).**

Dear Ms. Orsaba:

The California Department of Fish and Wildlife (CDFW) has reviewed the above referenced Draft Environmental Impact Report (DEIR) for the proposed San Diego Gas and Electric (SDG&E) Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects. The following statements and comments have been prepared pursuant to the Department's authority as a Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized "take" of birds. Sections of the Fish and Game Code that protect birds, their eggs and nests include Sections 3503 (regarding unlawful "take," possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the "take," possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful "take" of any migratory nongame bird). The Department also administers the Natural Community Conservation Planning (NCCP) program. SDG&E participates in the NCCP program by implementing its approved Subregional NCCP.

The proposed project would include issuance of a MSUP for the SDG&E system that would combine over 70 existing special use permits and allow for the continued operation and maintenance of 102 miles of electrical lines and facilities and approximately 34 miles of access roads within the Cleveland National Forest (CNF). Additionally this project would provide PTC the replacement of five 69-kilovolt (kV) transmission lines (TL) and six 12 kV distribution circuits (C) totaling approximately 146 miles both on and off CNF. Replacement transmission lines and distribution C would primarily include fire hardening (wood-to-steel pole replacement), relocation, and undergrounding.

*Conserving California's Wildlife Since 1870*

Biological impacts include approximately 165 acres of temporary impacts by direct bury, helicopter fly yard, staging areas, micropile, removal, and stringing sites. Permanent impacts include 0.48 acre which would be a result of direct bury and micropile activities. Both permanent and temporary impacts include Diegan coastal sage scrub (CSS), oak woodland, montane forest, montane wet meadow, and riparian habitats, amongst others.

The CNF study area is located within multiple locations within the Trabuco, Palomar, and Descanso ranger districts of the CNF, Orange and San Diego counties. The proposed power line replacement projects are located within and outside the Palomar and Descanso ranger districts of the CNF in the vicinity of the unincorporated communities of Alpine, Boulevard, Pine Valley, Descanso, Campo, Pauma Valley, Santa Ysabel, Julian, and Warner Springs within the central portion of San Diego County.

The Department provides the following comments:

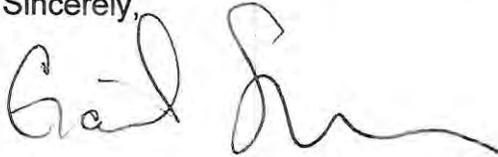
1. Golden eagle (*Aquila chrysaetos*) is a Fully Protected species under the Fish and Game Code Section 3511 which has been observed within the project's study area and has historically nested near the proposed project. Further, golden eagles occur and have a high potential to occur within 4,000 feet of additional areas within the survey area of the project. Golden eagles are a "covered species" under SDG&E's NCCP; however, the Department would like to clarify that SDG&E does not have "take" authorization for any individual golden eagles through their SDG&E NCCP Permit or Implementing Agreement. At the time of SDG&E's NCCP approval, fully protected species were not provided "take" authorization which precludes the direct "take" and "indirect take" of Fully Protected species. As a "covered" species of the NCCP, this species is expected to benefit indirectly from the NCCP through the operational protocols as an ecosystem-based approach to traditional utility construction, maintenance and repair activities. The Department recommends coordination with the Wildlife Agencies regarding current data and to protect this species.
2. Given the proposed project's large-scale geographic area and prolonged duration of construction, the Department is concerned the all-encompassing Mitigation Measure MM BIO-28 to conduct bird nesting surveys is not reasonably achievable as it does not reflect site-specific environmental conditions (e.g., species composition, high-use avian flyways, historic nesting locations, habitat type, topography) and project activities (e.g., helicopter use, pole replacement, vegetation modification, etc.). Our concern is that if measures are not easily achievable then nesting bird protection may be compromised despite reasonable intention of the mitigation measure(s). The Department recommends that a project specific avian nesting protection plan be developed in coordination with the Wildlife Agencies to create measures based off site-specific conditions to protect nesting birds to the maximum extent possible that will allow the Wildlife Agencies open communication with the biological monitor.

3. The project identifies the federally endangered Laguna Mountains skipper (*Pyrgus ruralis lagunae*) and Quino checkerspot (*Euphydryas editha quino*), and federal Candidate for listing, Hermes copper (*Lycaena hermes*), butterfly occurrences and/or moderate to high potential to occur in multiple circuit/transmission line areas. The Department supports the proposed Mitigation Measure BIO-17 to conduct preconstruction protocol surveys for these species in areas known to support the species irrespective of historic surveys.
  - a. The Department requests butterfly protocol survey data be provided to the South Coast Regional Office.
  
4. The project identifies occurrences and/or potential to occur on-site of Townsend's big-eared bat (*Corynorhinus townsendii*), a candidate species under CESA, and 8 additional other special status bat species which meet the CEQA definition of rare, threatened or endangered species (CEQA Guidelines §15065). Additionally, bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish and Game Code § 4150, California Code of Regulations, Section 251.1). The Department recommends the following bat survey measures be incorporated into proposed preconstruction survey monitoring:
  - a. Bats may utilize rocky outcrops, dense tree canopies, snags, bridges over creeks/water, mines/caves/flumes, cave-like structures, and/or vacant buildings. These habitat types should be specifically surveyed if present within the project. Foraging areas should also be identified and specific flight routes to those foraging areas as well.
  - b. Appropriate combination use of acoustic surveys of habitat and around structures, structure inspection, sampling, and exit counts to survey the area that may be directly or indirectly impacted by the project. Please note the Townsend's big-eared bat have an extremely faint echo locating call making their detections difficult with bat detectors, thus, acoustic surveys are discouraged for this species. Bats should be identified to the most specific taxonomic level possible, and evaluate any roosts to determine its size and significance.
  - c. Bat surveys should include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map), 2) the number of bats present at the time of visit (count or estimate), 3) each species of bat present shall be named (include how the species was identified), 4) the location, amount, distribution and age of all bat droppings shall be described and pinpointed on a map, and 5) the type of roost; night roost (rest at night while out feeding) versus a day roost (maternity colony) must also be clearly stated; 6) all survey results, including field data sheets should be provided to the Department's South Coast Region. Locations of all roosts should be kept confidential to protect them from disturbance.

5. In the event bat roosts are identified during biological construction monitoring, the Department requests consultation to provide additional guidance and recommends Mitigation Measures MM BIO-30 be expanded to include the following:
  - a. Proposed project avoidance measures for Townsend's big-eared bat be applied to all bat species detected within the 100 ft. buffer from project related activities.
  - b. It is crucial for the protection of young (i.e., unable to fly) and hibernating adults for project related activities to be avoided during the winter and spring regardless of species.
6. Biological monitors and/or surveyors monitoring/surveying for all fully protected species, state and/or federal endangered, threatened, or candidate species, state species of special concern, and/or other protected species shall be experienced with the species and hold, in addition to a Scientific Collecting Permit, a Memorandum of Understanding (MOU) for each species that qualifies as described above. Please refer to the following link for more information: [http://www.dfg.ca.gov/wildlife/nongame/research\\_permit/mou.html](http://www.dfg.ca.gov/wildlife/nongame/research_permit/mou.html).
7. The Department requests all sensitive species occurrence data be submitted to the California Natural Diversity Database (CNDDDB) to add to the inventories for the status and locations of rare plants and animals in California.
8. The Final EIR should provide detailed analysis of compensatory mitigation requirements for permanent impacts. Analysis should include a table based upon SDG&E's NCCP mitigation ratios and provide justification on determination of whether impacts occur within or outside of the "Preserve" as discussed in SDG&E's NCCP.
9. Table D.4-9 identifies multiple TL and C sites include temporary and/or permanent impacts that would occur to CDFW/Regional Water Quality Control Board resources however, no additional data is available. Further, D.4-120 states "temporary impacts associated with the removal of poles within CDFW jurisdiction will not substantially adversely affect an existing fish or wildlife resource; therefore, an SAA notification was not submitted". A formal jurisdictional delineation is required prior to project implementation by the various regulatory agencies to determine if permitting would be necessary. The Department is limited in its ability to provide meaningful feedback on the DEIR and recommends a thorough discussion and potential impacts analysis to jurisdictional wetlands and waters be provided in the Final EIR.

Thank you for this opportunity to comment on the DEIR. Questions regarding this letter and further coordination regarding these issues should be directed to Stephanie Ponce at (858) 467-4237 or [Stephanie.Ponce@wildlife.ca.gov](mailto:Stephanie.Ponce@wildlife.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Gail K. Sevens". The signature is fluid and cursive, with a long horizontal flourish at the end.

Gail K. Sevens  
Environmental Program Manager  
California Department of Fish and Wildlife

cc: Jesse Bennett FWS (U.S. Fish and Wildlife Service)  
Scott Morgan (State Clearinghouse)  
Kirsten Winter USFS (U.S. Forest Service)



# County of San Diego

**MARK WARDLAW**  
DIRECTOR  
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PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
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**DARREN GRETLER**  
ASSISTANT DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

November 4, 2014

Lisa Orsaba  
California Public Utilities Commission, c/o Dudek  
605 Third Street  
Encinitas, CA 92024

Via email to: [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)

## **COMMENTS ON THE JOINT DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SDG&E MASTER SPECIAL USE PERMIT AND PERMIT TO CONSTRUCT POWERLINE REPLACEMENT PROJECTS**

Dear Ms. Orsaba,

The County of San Diego (County) has received and reviewed the Notice of Availability (NOA) and Notice of Public Meeting for the Joint Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) for the proposed SDG&E Master Special Use Permit (MSUP) and Permit to Construct Powerline Replacement Projects dated September 4, 2014. The County appreciates that SDG&E has already been working with staff to ensure that the replacement of poles on County property occurs within SDG&E easements and is consistent with their Natural Community Conservation Plan (NCCP). The County appreciates this opportunity to comment. County Planning & Development Services (PDS), Department of Public Works (DPW), and Department of Parks and Recreation (DPR) have completed their review and have the following comments:

### **Visual**

1. The document states that significant and unmitigable visual impacts will occur as a result of the implementation of these projects. The County suggests the consideration of additional alternatives that will have less visual impact.

### **Hydrology and Water Quality**

2. Section D.9.2.3 (Page D.9-26) states that the proposed project is subject to the Region 7 (Colorado River Basin) and Region 9 (San Diego Basin) plans. The DEIR/DEIS should list that the proposed project is also subject to the Region 9 Municipal Separate Storm Sewer Systems (MS4) Permit requirements (e.g. Order No. R9-2007-0001, Order No. R9-2013-

001, etc.) issued by the San Diego Regional Water Quality Control Board (SDRWQCB). If the above referenced requirements are not applicable to the project, please edit the paragraph to provide a brief explanation as to why the project will not need to comply with those requirements.

3. Section D.9.3.1 (Page D.9-26) starts off by providing definitions of significance criteria, or thresholds, listed in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The section provides impact statements in a category named, "Construction-Related Impacts," to collectively address criterion a) through f). However, it appears that criterion e) is not covered in this category. Please explain how the project addresses criterion e) in the "Construction-Related Impacts" category.
4. Section D.9.3.3 (Page D.9-29) – As a suggestion, it would be helpful to provide a table summarizing the result of the "direct and indirect effects" related to hydrology and water quality (e.g. impacts, mitigation measures, etc.) for each Applicant Proposed Measure (APM).
5. Section D.9.2.3 (Page D.9-26) – The DEIR/DEIS should include a reference to the County's Flood Damage Prevention Ordinance Section 811.506 for project activities that occur within the County's jurisdiction which states that "No encroachments, structures, fill, construction, improvements, development, storage, or placement of vehicles, debris or other materials or uses which may increase flood depths or interfere with flood flows to any degree are allowed within the designated FEMA or County-mapped Floodway unless a certification is provided that the proposed use shall not result in any increase in flood levels or the volume or velocity of flood flows during the occurrence of the base flood discharge".
6. Coordination with the County Flood Control District will be required for any portion of a project that will be located within lines of inundation of a County or FEMA-mapped floodway/floodplain. Clearing, grading, and/or trenching that would affect the water surface elevation could be subject to all Federal (FEMA) and County Regulations, and would require proper permitting as well as discretionary project review in accordance with Section 811.401 of the County's Flood Damage Prevention Ordinance.

## **Noise**

7. Section D.11.3.3 (Page D.11-19) –The Nighttime Construction section needs to be revised to state that all nighttime construction activities are considered an impact. No noise mitigation measures would be feasible to reduce this to less than significant. This impact is significant and unmitigable.
8. Section D.11.3.3 (D.11-20) –MM NOI-4 indicates the potential for construction equipment activities to occur outside of the allowable construction hours as defined in County Code Noise Ordinance, Section 36.408. Any exceedance to the County Noise Ordinance is considered an impact. There is no mitigation measure known at this time to reduce this impact to less than significant. This impact must be identified as significant and

unmitigable and will require a noise variance. The County does not consider a noise variance as a noise mitigation measure.

9. Table D.11-9 (Page D.11-32) - Revise MM NOI-4 as Significant and Unmitigable.
10. Section D.11.3.3 (Page D.11-19) – We recommend the inclusion of additional noise reducing measures that would be typically referenced in the required blasting plan. For example, portable noise barriers, reduction in construction equipment, etc..

The County appreciates the opportunity to participate in the environmental review process for this project. We have included as an attachment comments received from the Boulevard Community Planning Groups for your consideration. If you have any questions regarding these comments, please contact Sheri McPherson, Land Use/Environmental Planner, at (858) 694-3064, or via email at [sheri.mcpherson@sdcounty.ca.gov](mailto:sheri.mcpherson@sdcounty.ca.gov).

Sincerely,



DARREN GRETTLER, Assistant Director  
Planning & Development Services

Attachment: Comment letter from the Boulevard Community Planning Group, October 18, 2014.

e-mail cc:

Adam Wilson, Policy Advisor, District 2  
Chris Livoni, Policy Advisor, District 5  
Conor McGee, CAO Staff Officer, LUEG  
Rene Vidales, Program Coordinator, Department of Public Works  
Jennifer Price, Land Use/Environmental Planner, Department of Parks and Recreation  
Jeff Kashak, Environmental Planning Manager, Department of Public Works  
Alpine Community Planning Group  
Boulevard Community Planning Group  
Campo/Lake Morena Community Planning Group  
Cuyamaca Community Sponsor Group  
Descanso Community Planning Group  
Jamul-Dulzura Community Planning Group  
Julian Community Planning Group  
Pala-Pauma Community Sponsor Group  
Pine Valley Community Planning Group  
Potrero Community Planning Group  
Sheri McPherson, Land Use/Environmental Planner, Planning & Development Services

# BOULEVARD PLANNING GROUP

PO Box 1272, BOULEVARD, CA 91905

**DATE:** October 17, 2014 (amended 10-18-14 with DRECP information @page 10)

**TO:** San Diego County Planning & Development Services

**VIA:** [Sheri.McPherson@sdcounty.ca.gov](mailto:Sheri.McPherson@sdcounty.ca.gov); CC: to CPUC & USFS VIA: [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)

**FROM:** Donna Tisdale, Chair; 619-766-4170; [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

## **RE: SDG&E Master Special Use Permit – DEIR/DEIS Comments**

As directed by the County, these comments are addressed to San Diego County Planning & Development Services and copied to the CPUC and US Forest Service.

SDG&E's application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects Docket Number A.12-10-009<sup>1</sup> is another link in their east west expansion plan, to connect renewable energy projects in Imperial County, East County, and Northern Baja California with energy hungry urban areas along the coast.

**After a public discussion at our regularly scheduled meeting held on October 3<sup>rd</sup>, the Boulevard Planning Group unanimously approved the following motion on SDG&E's Master Special Use Permit:**

- *Authorize the Chair to submit comments and recommend undergrounding (TL6931) between the new Boulevard substation and Crestwood Substation; from the Crestwood Substation to Cameron Substation (TL629); and more if possible.*

The Group's goals are to further reduce fire ignition sources, the potential for increased lightning strikes, and impediments to fire fighting; to protect adjacent residential and riparian areas; and to improve scenic vistas along Historic Route 80 that TL6931 generally follows east to west.

Historic Route 80 is designated scenic by the County with extensive views of adjacent chaparral covered rolling terrain, oak studded valleys and creek beds, and distant ridgelines that will be degraded by taller metal poles with additional and thicker lines (conductors) that appear much more visible and reflective than the lines that are being replaced. Taller poles will place infrastructure more in the line of vision of drivers along Historic Route 80 than existing lines, especially in the area between Tule Jim in Boulevard and Buckman Springs Road in Campo.

### **Comment limitations:**

- Due to the County's request for these comments by October 17<sup>th</sup> the amount of time for full review and comment has been reduced.
- Due to the reduced timeframe and other obligations these comments are limited in scope, thoroughness, and proper editing.

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<sup>1</sup> <http://www.sdge.com/regulatory-filing/3404/sdge-south-orange-county-reliability-enhancement-socre-project>

### Concerns with Assigned Commissioner Peevey:

- Recent allegations of wrong doing filed against Commissioner Peevey, with requests for investigations by the Attorney General, do raise concerns.
- Commissioner Peevey recently announced that he will step down at the end of his term in December and not seek reappointment.
- Assignment of a new Commissioner to this project seems appropriate, sooner rather than later.

### Dudek's poor track record with environmental review and 3<sup>rd</sup> party mitigation and monitoring with ECO Substation, Tule Wind, Soitec Solar and /or related projects is very discouraging:

- A CPUC response from staff attorney, John Reynolds, to a Public Records Act Request (reference # 1199), dated 7-24-14, confirms the CPUC was unaware of any groundwater monitoring conducted within one mile of groundwater wells used during construction of the ECO Substation project, where Dudek is the 3<sup>rd</sup> party monitor.
- MM HYD 3 for ECO Substation required monitoring to ensure no adverse impacts to groundwater production rates to wells within 1-mile radius.
- Major concerns and challenges have also been raised with Dudek's groundwater investigation for the Soitec Solar projects proposed in Boulevard.
- San Diego County's Planning & Development Services required Dudek to revise the Soitec groundwater investigations to include many project water uses that had been excluded from the original and exposed by Boulevard and Jacumba residents and planning groups.

### Executive Summary:

- No proposed project or selected alternatives maps are included in the Executive Summary—they should be
- The BIA proposed alternative should include undergrounding of lines through Campo Reservation lands that pass by their Golden Acorn Casino project and tribal housing.
- **ES 4.4.2:**
  - This section references fire hardening 6 miles of existing 69kV TL6931 and adding a circuit through Boulevard
  - Or...modify existing TL625 by constructing a new 3-mile double circuit loop-in into the Suncrest Substation.
  - ***Another alternative would be to modify TL625 by undergrounding a new 3-mile double circuit loop in to the Suncrest Substation and leave TL6931 as is.***

### B.2 Project Location—is misleading

- Fails to include Boulevard
- Fails to include Boulevard's TL6931 that is now part of so-called Environmentally Superior Alternative

### E.3.3.2 Removal of TL626 from Service = reconstruction of TL6931 and major new impacts for Boulevard/ Campo tribal lands & a connection with ECO Substation that could transfer much more future energy through those predominantly low-income communities

- At first glance removal of TL 626 in the Cleveland National Forest sounds like a very good idea.
- However, the late addition of the so-called Environmentally Superior alternative includes Reconstruction of TL6931 from Boulevard Substation to Crestwood Substation through residential, undisturbed, sensitive and scenic areas of Boulevard and Campo tribal lands, alongside Historic Route 80 that San Diego County has designated a scenic highway.
- TL6931 was previously part of SDG&E's A.12-12-007 for Shu'luuk Wind gen-tie/fire hardening application<sup>2</sup> that was withdrawn with the Campo Band's General Council denial of the Shu'luuk Wind lease agreement with Invenergy.
- The public environmental review process was never completed for upgrading TL6931 through Boulevard between the Crestwood Substation and the new expanded Boulevard Substation.
- TL6931 is located in a an area of Boulevard / Campo Reservation where the majority of the chaparral, riparian areas, oak groves, open grazing lands and scenic vistas have not burned in 40 years, according to the Fire History 2014 that includes 2014 fire perimeters as of 8-4-14 (with exception of the Old Fire that burned near Golden Acorn Casino)
- This Boulevard/Campo section of line should be placed underground to reduce visual impacts, impacts to residents and birds, and impacts to fire fighting tactics, similar to what ALJ Yacknin required for the ECO Substation's new 138kV line through along Historic Route 80 between ECO Substation and Carrizo Gorge Road and through Boulevard's Jewel Valley from the border area to the Boulevard Substation rebuild.
- A future expansion was built into the CPUC ECO Substation approval that allowed for the installation of two 138kV lines in the underground sections through Jacumba and Boulevard Planning Areas. Completion is expected in November 2014.

**E.4.3 Environmentally Superior Alternative = defacto future high voltage connection to SDG&E's 85-acre ECO Substation, SDG&E's Southwest Powerlink, SDG&E's Sunrise Powerlink, and SDG&E's cross border Energia Sierra Juarez Wind project**

- Table E-3 shows the so-called Environmentally Superior Alternative includes removal of TL626 and replacement with electric facilities within the existing electric utility ROWs:
  - Reconstruction of TL 6931 (in Boulevard)
  - Conversion of 13 miles of TL262 to 12kV
  - Note 1: "Reconstruction of TL 6931 compared to developing the TL625 loop-in along the Sunrise Powerlink would rank similarly in terms of number of adverse impacts created vs reduced or eliminated.
  - Reconstruction of TL6931 is ranked higher reportedly due to the extensive work completed for TL6931, which provides a knowledge base that reduces the risk of impacting environmental resources (Sources: SDG&E 2012 PEA)..."
  - For the record, TL6931 Fire hardening included a new 138kV line within a new and wider Right of Way, although SDG&E was not successful in securing all the expanded easements for the private Gen-tie line, including the Campo Reservation where the new Shu'luuk Wind turbine project was proposed and then rejected by the tribe's general council vote.

**SDG&E's A.12-12-007 to the CPUC for their proposed \$34 million (+-10%) TL 6931 Fire Hardening / Wind Interconnect Project Docket Number was dismissed /closed as of March 6, 2014<sup>3</sup>**

<sup>2</sup> <http://www.sdge.com/regulatory-filing/3968/sdge%E2%80%99s-application-permit-construct-tl-6931-fire-hardeningwind-interconnect>

- With CPUC Decision D.14-03-001, SDG&E's A.12-12-007 was dismissed and closed upon SDG&E's written and unopposed request, after the Campo Band voted down the lease for Invenergy's Shu'luuk Wind turbine project.
- SDG&E's PEA for the original Fire Hardening and Shu'luuk Wind gen-tie project (A12-12-07) was for a double-circuit 138kV line with an expanded easement from 25 feet to 100 feet.
- includes staging areas in environmentally sensitive areas within Boulevard Planning Area in flood plains and adjacent to riparian areas, oak groves and Historic Route 80 which is also a scenic route (see Figures 3-2; 3-2A; 3-2B and 3-2C)
- The related environmental review /public review process was never completed, and no new information appears to have been provided for the current MSUP application. This is the same bait and switch process that Boulevard and other communities were subjected to with the belated introduction of the so-called Environmentally Superior Sunrise Powerlink.
- If selected, this section of the line should be placed underground due to the close proximity to numerous homes, oak groves and riparian areas between Boulevard and the Cameron Substation on Buckman Springs Road (Campo Creek, Miller Valley Creek, La Posta Creek, etc)
- SDG&E's response to the data request<sup>4</sup> (at page 9) includes the following response explaining why the fire hardening work stopped at the point where the Shu'luuk Wind project gen-tie interconnect does not continue the entire length of TL6931:
  - San Diego Gas & Electric Company (SDG&E) currently has a 24 foot wide easement in perpetuity for the single circuit wood portion of TL6931 on Campo Tribal Land.
  - Because the TL 6931 Fire Hardening/Wind Interconnect Project will be built in a double circuit 138kV configuration, additional easement width is needed within Campo Tribal Land to accommodate the proposed 100 foot wide easement.
  - Unfortunately, SDG&E and the Campo Tribe were unable to reach agreement on the land value and terms for SDG&E to purchase additional easement across the Campo Reservation. Consequently, the tribe has elected to interconnect the Shu'luuk Wind Project with SDG&E at the eastern boundary of the Campo Reservation where TL6931 exits tribal land.
  - SDG&E lists Approximately 50 impacted Boulevard properties (at page 50)<sup>5</sup>

**With the late addition of the proposed Environmentally Superior Route, the CPUC and SDG&E seem to be pulling another bait and switch with Boulevard receiving the blunt end of the stick, similar to the late addition of the CPUC's so-called Environmentally Superior Southern Route of the Sunrise Powerlink through Boulevard and other disproportionately impacted rural communities.**

- Here, TL6931 through Boulevard will now be upgraded to provide a missing link in SDG&E's incremental / piecemealed expansion of another high voltage east west line that can serve to open capacity on the Southwest Powerlink (SWPL) and /or the Sunrise Powerlink.
- TL6931 connects to the new expanded Boulevard Substation and SDG&E's \$435 million ECO Substation.
- SDG&E's ECO Substation map<sup>6</sup> shows the connection to the new Boulevard Substation and also shows their Sunrise Powerlink's end point at Sycamore substation

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<sup>3</sup> <http://www.sdge.com/regulatory-filing/3968/sdge%E2%80%99s-application-permit-construct-tl-6931-fire-hardeningwind-interconnect>

<sup>4</sup> [http://www.cpuc.ca.gov/environment/info/dudek/Wind\\_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201\\_03-05-13\\_COMBINED.pdf](http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201_03-05-13_COMBINED.pdf)

<sup>5</sup> [http://www.cpuc.ca.gov/environment/info/dudek/Wind\\_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201\\_03-05-13\\_COMBINED.pdf](http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201_03-05-13_COMBINED.pdf)

<sup>6</sup> <https://www.sdge.com/sites/default/files/documents/ECOSubstationProjectMap.pdf>

- The ECO Substation connects to SDG&E’s Southwest Powerlink (SWPL) and Sempra’s new Energia Sierra Juarez cross-border line with 1,250 MW of capacity.
- According to SDG&E’s project application, their ECO Substation is built to handle expansions up to approximately 4,800 MW with multiple 500kV lines, 230kV lines and 138kV lines.
- The substation is designed so that it will ultimately be expanded to include the following components<sup>7</sup>:
  - Five 500 kV bays in a breaker-and-a-half bus configuration
  - Nine 230 kV bays in a breaker-and-a-half bus configuration
  - Nine 138 kV bays in a double-bus/double-breaker configuration
  - Four 500/230 kV, 1,100 megavolt ampere (MVA) transformer banks with two single-phase operational spares
  - Three 230/138 kV, 224 MVA transformer banks
  - One or more 500 kV series capacitors
  - Two 230 kV, 63 MVAR shunt capacitors
  - Four 12 kV, 180 MVAR shunt reactor banks
  - One 230 kV static VAR compensator
  - The maximum amount of oil required for the transformers at the ECO Substation will be approximately 569,800 gallons.
- SDG&E’s MSUP project website includes links to all TL lines except TL6931<sup>8</sup>. Why?
- SDG&E’s project Fact Sheet and map<sup>9</sup> do not include the belated addition of TL6931 through Boulevard’s occupied residential and ranch lands
- **SDG&E’s \$135 million Sycamore to Penasquitos 230 kV Transmission Line CPCN Project Docket Number: A.14-04-011 is another link in SDG&E’s east west high voltage line expansion<sup>10</sup>.**
  - SDG&E’s project map for their Sycamore to Penaquitos link shows their new 230kV line and consolidation of two existing 69kV lines onto new steel poles, starting at the Sycamore Substation<sup>11</sup>.
  - Figure 3.1<sup>12</sup> shows the regional location of this piece of SDG&E’s incremental expansion plan.
  - The project description at page 7<sup>13</sup> states that SDG&E’s ability to operate its bulk electric transmission system reliably and efficiently has become constrained, particularly at gateway substations. During periods of high customer demand and high energy imports, as well as during periods of high renewable energy generation in the Imperial Valley, most of the energy imported into San Diego flows across the 500 kV Southwest Powerlink and Sunrise Powerlink transmission lines. This imported energy then flows into the Miguel and Sycamore Canyon Substations, respectively. Heavy energy flows into these gateway substations can result in congestion and subsequent NERC reliability criteria violations on the 230 kV, 138 kV, and 69 kV transmission and power lines downstream, requiring dispatch of less efficient generation, increasing energy cost for ratepayers and eventually requiring upgrades to these downstream facilities... In addition, significant renewable generation is expected to be developed in the Southeastern United States, which will further increase flows on the Sunrise Powerlink and into Sycamore Canyon Substation.

<sup>7</sup> <https://www.sdge.com/sites/default/files/documents/ECOAppPermittoConstruct.pdf>

<sup>8</sup> <http://www.sdge.com/key-initiatives/cleveland-national-forest-maps>

<sup>9</sup> [https://www.sdge.com/sites/default/files/documents/1717237822/FINAL%20S1380238%20ClevelandNatForestPoverline\\_FS.pdf](https://www.sdge.com/sites/default/files/documents/1717237822/FINAL%20S1380238%20ClevelandNatForestPoverline_FS.pdf)

<sup>10</sup> <http://www.sdge.com/regulatory-filing/10646/sdge-sycamore-penasquitos-230-kv-transmission-line-cpcn-project>

<sup>11</sup> <http://www.sdge.com/key-initiatives/sycamore-penasquitos-230kv-transmission-line-project-map>

<sup>12</sup> <https://www.sdge.com/sites/default/files/regulatory/3.0%20-%20Project%20Description.pdf>

<sup>13</sup> <https://www.sdge.com/sites/default/files/regulatory/A.14-04-011%20SDGE-SXPQ-CPCN-Application-Vol1.pdf>

## **D.8 Fire & Fuels Management errors & omissions**

- **Figure D.8-1: Boulevard and TL9631 are omitted from this fire hazard map**
- D.8-11: The rural communities of Boulevard, Campo, and Portero are impacted by this project, are located in wildfire corridors with continuous fuel beds, and yet they are inexplicably left out of the list of Communities at Risk
- D.8-15: Under Tribal Fire Departments, the Campo Reservation Fire Department's vehicles and equipment are listed. Where is the documentation on the number and training of related personnel / boots-on-the-ground that are generally available to operate the equipment?
- Campo tribal members have confided/ alleged that their fire department staffing has been reduced and pay for some tribal members is below minimum wage.
- Factual information on paid / volunteer staffing levels for all must be included.
- A new Boulevard Fire station is under construction.
- When completed, the White Star Fire Station will be closed and Cal Fire will reportedly move to Boulevard Fire station.
- Boulevard previously had both a volunteer fire department and Cal Fire's White Star
- Boulevard is getting less protection.
- Some of our project mitigation funded and community funded fire-fighting equipment has been sent to other communities by an ever changing list of those in charge at Cal Fire, Rural Fire, San Diego County Fire Authority.

## **D.9 Hydrology**

- SDG&E's ECO Substation list of hazardous materials includes soil stabilizers
- TL6931 is omitted from this section as are the related blue line streams that it crosses
- The Campo-Cottonwood Creek Sole Source Aquifer designation / boundaries are not included. This is one of only two such designations in Southern California
- San Diego County's Guidelines for Determination of Significance and Groundwater Ordinance do not take Climate Change impacts into account
- MM HYD2a is inadequate based on SDG&E's vastly inadequate and underestimation of amount of water needed and the controversial and questionable groundwater use during construction of their ECO Substation project.
- 30 million gallons was estimated and amended to 90-100 million gallons of water
- MM HYD-2b is also inadequate based on current experience with CPUC handling of water supply sources, failure to vet SDG&E's reports and project modification figures, failure to implement mitigation measures for ECO Substation.
- No local groundwater resources should be used
- There is little to no oversight of local water districts or tribal wells
- SDG&E should be required to import water for this project

## **F. Cumulative Scenario and Impacts—errors & omissions:**

- Errors and omissions downplay the real world impacts to the environment and wild life, fire-prone and drought stricken rural communities, and a wide variety of natural resources, which are significant, cumulatively significant, and represent disproportionate impacts in the predominantly low-income communities Boulevard and Jacumba Hot Springs.

## **Figure F-1 Cumulative Projects Map—errors & omissions:**

- **Failure to include TL6931 which is now part of the so-called Environmentally Superior Alternative**

- **Map ID T-3: Failure to include major details/impacts of SDG&E ECO Substation project where Dudek is the 3<sup>rd</sup> party monitor and should be fully informed.**
- Failure to adequately identify and document the scale and scope of the majority of SDG&E's \$435 million 85 acre ECO Substation (500/230/138kV),
- **Failure to include or identify the Boulevard Substation Rebuild site location**
- **Failure to include the 14 miles of new 138kV line(s) connecting ECO and Boulevard Substations**—all of which is currently under noisy and visually intrusive construction for a majority of the route between Jacumba Hot Springs and Boulevard, as depicted by two photographs below.
- **Failure to include Ocotillo Wind's existing 265 MW 12,436 acre footprint**
- **If Figure 1 includes a few projects in Imperial County, it should be corrected to include all the renewable and transmission projects already approved and /or proposed on BLM lands using their list<sup>14</sup> and map<sup>15</sup> dated July 2014.**
- **It should also include all energy/transmission projects approved and proposed in Imperial County** using the maps<sup>16</sup> and project lists (as of 10-1-14)<sup>17</sup> posted on their Planning and Development Services website.
- **Much of the energy generated by Imperial Valley renewable is or will be transmitted through rural East County** on existing, proposed, and alternative transmission proposals currently under review by the CEC, CPUC, IID, and CAISO.
- **ECO Substation project construction water use was estimated at 30 million gallons and was amended repeatedly for up to 90-100 million gallons**—outside public comment period.
- **As of May 31, SDG&E had already exceeded the estimated 1.5 million water truck miles** and provided invalid and misleading information to the CPUC project manager as documented in the attached letter from attorney Stephan C Volker dated 4-17-14, challenging SDG&E's water use and mileage numbers presented in their **East County Substation, Minor Project Refinement Request 14 (A.09-08-003)**.
- **Cumulative construction water use/ sources and related GHG emissions must be included.**
- **Map ID-Wind 4 project marker fails to accurately portray the immense scale and scope Iberdrola's approved 186 MW Tule Wind project and over 12,000 acre footprint** on BLM land looming over the McCain Valley / Manzanita Reservation/ La Posta/ Thing Valley areas between Boulevard and La Posta Road.
- **It fails to include the Tule Wind gen-tie route or system of overhead collector lines.**
- **It fails to show Tule Wind's turbine project footprint approved last December for Ewiiapaayp tribal lands** or turbines proposed for State Land Commission School lands, or the extensive and intrusive network of approved overhead collector and gen-tie lines.
- **Map ID Wind 5 - National Quarries footprint falsely appears to be larger than the Tule Wind footprint.**

<sup>14</sup> <http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/solar.Par.84447.File.dat/BLM%20Solar%20Applications%20&%20Authorizations%20April%202013..pdf>

<sup>15</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/application\\_maps.Par.30605.File.dat/CDD\\_Application\\_Map.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/application_maps.Par.30605.File.dat/CDD_Application_Map.pdf)

<sup>16</sup> <http://www.icpds.com/?pid=2934>

<sup>17</sup> <http://icpds.com/CMS/Media/Planning-Staff-Report-Updated-10-1-14.pdf>

- **Figure F-1 fails to show the proposed 5-6 mile 138kV gen-tie for Soitec Solar’s proposed 420 acre Tierra Del Sol Solar project in Tierra Del Sol area of Boulevard Planning Area, with a ROW through the foot print of the 2012 Shockey Fire that burned over 2,500 acres, 14 homes and resulted in one death in the Tierra Del Sol / Hi Pass neighborhood of Boulevard.**
- **Map ID S-3 Amonix Solar has reportedly been withdrawn and should be removed**
- **Map ID S-6 Fox Solar has reportedly been withdrawn and should be removed**
- **Map ID S-7 for Soitec’s LanWest and LanEast should have two separate numbers for two separate projects**
- **Map ID S-14 Solar Energy Project MPA13-009 by SDG&E fails to include total MW or acreage**
- **NextEra Energy’s new Jacumba Solar MUP application 14-041 is proposed for 300 acres adjacent to SDG&E’s ECO Substation<sup>18</sup> at the US/Mexico border east of Jacumba Hot Springs should now be included. It replaces BP’s previous Jacumba Solar project which is identified on F-1 as S2.**
- **Axio Power Holdings LLC has proposed the new Cameron Solar Energy Project (MPA-14-019) with 190 acres of PV to be installed in the beautiful and highly visible Campo Valley west of Lake Morena Drive near the entrance to Hauser Canyon.**
- **The Cameron Solar Energy Project plot plan shows the point of grid connection as SDG&E’s TL6923<sup>19</sup> that is involved in this MSUP DEIR/EIS; Dudek is listed on the plot plan provided by San Diego County to the Campo Planning Group, so they should have been aware of this cumulative impact project.**
- **Additional Solar projects already approved and /or constructed in the Borrego Valley should also be included.**
- **Figure 1-S1 Imperial Valley Solar-Solar Two, CACA 047740 should be removed; it is no longer listed on the website of BLM’s El Centro office<sup>20</sup>.**
- **Map ID F3 Lake Morena Community Defense (LMCD) Project:** The USFS scoping notice for the LMCD Project includes the following statement under Purpose & Need:
  - *“Finally, aerial suppression action may be limited in surrounding areas of Campo/ Lake Morena (Hauser Canyon/Lake Morena Drive/Buckman Springs Road/La Posta Road), due to Sunrise Powerlink. This alteration of the typical aerial suppression procedure may contribute to larger fire growth...” (emphasis added)*
  - The same alteration of the typical aerial suppression procedure, and contribution to larger fire growth, holds true for all of SDG&E’s proposed fire hardening projects, expansions, and cumulative impact projects that induce growth of additional fire ignition sources and fire fighting impediments in designated wildfire corridors and Very High Fire Severity Zones.

**For perspective on the scale, scope and visual blight, we are providing the photograph below of the current SDG&E ECO Substation project and related 138kV line through Jacumba Hot Springs and Boulevard Planning Areas.**

<sup>18</sup> [http://www.sandiegocounty.gov/content/sdc/pds/ceqa\\_public\\_review/MUP-14-041.html](http://www.sandiegocounty.gov/content/sdc/pds/ceqa_public_review/MUP-14-041.html)

<sup>19</sup> <http://www.cpuc.ca.gov/environment/info/dudek/CNF/ProjectLocationMap.pdf>

<sup>20</sup> <http://www.blm.gov/ca/st/en/fo/elcentro.html>

- Note the vehicles using the new steep slope access road for the 138kV line adjacent to the Sunrise Powerlink that was installed without access roads due to the sensitive nature of the area.
- Additional arms and wires can be installed on the new poles for future expansion purposes.
- Additional underground vaults have already been installed in the roadbed of Historic Route 80 and through underground section of Jewel Valley.

**Top photo was taken from Carrizo Gorge Road, south of I-8, looking west.**



**Bottom photo was taken from Historic Route 80, just west of Jacumba, looking south.**

**Old wooden home is now impacted by multiple high-voltage lines.  
Was the new 138kV line triple pole structure disclosed in the EIR/EIS?**



## **Additional transmission upgrades / cumulative impacts under consideration:**

### **The Desert Renewable Energy Conservation Plan (DRECP) DEIR/EIS<sup>21</sup> = 1-2 new 500kV lines through Eastern San Diego County along Sunrise Powerlink route as part of their infrastructure plan:**

- The DRECP's 2-page Preferred Alternative summary and map<sup>22</sup> shows a Development Focus Area covering virtually all of Imperial Valley farmland and some adjacent desert lands for potential renewable energy development, east of San Diego County.
- Energy will need to flow from Imperial Valley to the coastal cities, including San Diego, via SDG&E's system.
- The DRECP DEIR/EIS appendix K-Transmission and maps<sup>23</sup> show project alternatives 1-5 requiring one or two new 500 kV circuits through Eastern San Diego County along the Sunrise Powerlink route.
- Note the text boxes on the maps state that no existing lines are shown.
- The maps also state that the only substations that are shown are those included in the DRECP infrastructure plan.
- Related SDG&E substations included on the DRECP infrastructure plan maps include Imperial Valley Substation, Suncrest Substation, and Sycamore Substation.
- According to Appendix K, SDG&E and the CPUC are part of the DRECP planning process through the Transmission Technical Group created by the Renewable Energy Action Team in 2012.
- The DRECP appendix K maps are dated September 2013, so there was both knowledge and time for these infrastructure plan maps to be included as cumulative impacts.
- *However, Appendix K Table 4-2 does not appear to include the amount of land needed/ impacted for any new 500kV lines through Eastern San Diego County beyond the Borrego Valley. This is a significant omission.*
- *The DRECP includes a list of existing cumulative impact projects<sup>24</sup>.*
- *Those located in Imperial County and San Diego County, connected to SDG&E's project lines, other lines, their Imperial Valley Substation, ECO Substation, Sunrise Powerlink and Southwest Powerlink should be included in SDG&E's MSUP project: Ocotillo Express Wind; Centinela Solar; Imperial Solar Energy Center South; Campo Verde Solar, Mount Signal Solar; Solar Gen 2 (Arkansas, Alhambra, Sonora); NRG Solar Borrego 1; Sol Orchard 1-4, 6-10, 12-17;*
- *In addition, Soitec/Invenergy's Desert Green CPV project<sup>25</sup> is now under construction in Borrego and Imperial Valley Solar Energy Center west is currently under construction in Imperial County.*

### **Imperial Irrigation District's proposed Strategic Transmission Expansion Plan (STEP)<sup>26</sup>:**

- Expansion of IID's transmission system to accommodate up to 2,200 MW will connect with and impact SDG&E's transmission system, leading to expansion and/or upgrades through Eastern San Diego County.

### **The CAISO 2014-15 transmission discussion for moving energy out of Imperial County to San Diego<sup>27</sup>,**

<sup>21</sup> <http://www.drecp.org/draftdrecp/>

<sup>22</sup> [http://drecp.org/documents/docs/fact\\_sheets/DRECP\\_PREFERRED\\_Alternative.pdf](http://drecp.org/documents/docs/fact_sheets/DRECP_PREFERRED_Alternative.pdf)

<sup>23</sup> [http://www.drecp.org/draftdrecp/files/Appendix\\_K\\_TTG\\_Report.pdf](http://www.drecp.org/draftdrecp/files/Appendix_K_TTG_Report.pdf)

<sup>24</sup> [http://www.drecp.org/draftdrecp/files/Appendix\\_O\\_Existing\\_RE\\_Projects\\_within\\_Plan\\_Area.pdf](http://www.drecp.org/draftdrecp/files/Appendix_O_Existing_RE_Projects_within_Plan_Area.pdf)

<sup>25</sup> <http://www.invenergyllc.com/ProjectsbyCountry/UnitedStates/DesertGreen.aspx>

<sup>26</sup> <http://www.iid.com/index.aspx?recordid=362&page=30>

<sup>27</sup> <http://www.caiso.com/Documents/DraftSecondDiscussionPaper-ImperialCountyDiscussionPaper100814.pdf>

- The October 1<sup>st</sup> discussion paper<sup>28</sup> documents the need for new transmission projects/ upgrades or operational modifications, including footnotes 4-6 on page 4
- Those projects include new lines and upgrades at Imperial Valley Substation, Sycamore-Penasquitos 230kV line
- At page 8, an alternative SDG&E –Inland transmission route to Suncrest Substation/Sunrise Powerlink just east of Alpine, within the Cleveland National Forest

**October 8, 2014 California Independent System Operator’s Imperial County Transmission Consultation Workshop:**

- Aspen Environmental’s presentation (at request of CEC) at the CAISO stakeholders meeting included a September 2014 addendum<sup>29</sup> to the May 2014 report with transmission options for new lines/upgrades to replace San Onofre Nuclear generation:
- Maps showing land use study areas and onshore substations and transmission segments at pages 32 & 33 include Alternative 2: Alberhill to Suncrest and Alternative 5: Imperial Valley to Inland to connect to SDG&E’s Suncrest Substation through Cleveland National Forest and other lands
- **SDG&E Area Potential Mitigation Solutions found @ page 139 of CAISO presentation dated 9-24-14<sup>30</sup>**
  - ♣4 Network upgrades to address sub-transmission Category C issues
  - ♣Interim solutions prior to the IV PST in-service, including Coordinate with CFE and enable Otay Mesa–Tijuana 230 kV SPS as needed bypass series cap banks on NG-IV 500 kV line
  - ♣ By the time the IV PST project is in service, ultimate goal is to eliminate or minimize cross tripping the tie with CFE, including bypassing series cap banks on Sunrise and SWPL 500 kV lines swap BK81 position with BK80 in IV 500/230 kV substation three SPS to protect the main 500/230 kV system instant backup or new 500/230 kV bank at Miguel/ Suncrest/IV Coordination with CFE on IV PST operation procedure
  - ♣Energy Efficiency, DG, Demand Response, and Energy Storage

**ADDENDUM TO TRANSMISSION OPTIONS AND POTENTIAL CORRIDOR DESIGNATIONS IN SOUTHERN CALIFORNIA IN RESPONSE TO CLOSURE OF SAN ONOFRE NUCLEAR GENERATING STATION (SONGS) SEPTEMBER 2014 CEC-700-2014-002-AD:**

- **Figure 6 @ page 37 of the Schematic Map of Onshore Substations and Segments**, shows SDG&E proposed Alternative 2 for new lines connecting to Suncrest Substation off of Japatul Road within the Forest<sup>31</sup>

**Birds & Power lines:**

- **Refining Estimates of Bird Collision and Electrocution Mortality at Power Lines in the United States** Scott R. Loss; Tom Will; Peter P. Mar<sup>32</sup>; Smithsonian Conservation Biology Institute –

<sup>28</sup> <http://www.caiso.com/Documents/DraftSecondDiscussionPaper-ImperialCountyDiscussionPaper100814.pdf>

<sup>29</sup> [http://www.caiso.com/Documents/PresentationImperialCountyTransmissionConsultationOct8\\_2014.pdf](http://www.caiso.com/Documents/PresentationImperialCountyTransmissionConsultationOct8_2014.pdf)

<sup>30</sup> [http://www.caiso.com/Documents/Presentation-PreliminaryReliabilityAssessmentResults-Sep24\\_2014.pdf](http://www.caiso.com/Documents/Presentation-PreliminaryReliabilityAssessmentResults-Sep24_2014.pdf)

<sup>31</sup> <http://www.energy.ca.gov/2014publications/CEC-700-2014-002/CEC-700-2014-002-AD.pdf>

Migratory Bird Center, National Zoological Park, Washington, District of Columbia, United States of America; Division of; Migratory Birds – Midwest Regional Office, United States Fish and Wildlife Service, Bloomington, Minnesota, United States of America

- **Abstract**

- Collisions and electrocutions at power lines are thought to kill large numbers of birds in the United States annually. However, existing estimates of mortality are either speculative (for electrocution) or based on extrapolation of results from one study to all U.S. power lines (for collision). Because national-scale estimates of mortality and comparisons among threats are likely to be used for prioritizing policy and management strategies and for identifying major research needs, these estimates should be based on systematic and transparent assessment of rigorously collected data. We conducted a quantitative review that incorporated data from 14 studies meeting our inclusion criteria to estimate that between 12 and 64 million birds are killed each year at U.S. power lines, with between 8 and 57 million birds killed by collision and between 0.9 and 11.6 million birds killed by electrocution. Sensitivity analyses indicate that the majority of uncertainty in our estimates arises from variation in mortality rates across studies; this variation is due in part to the small sample of rigorously conducted studies that can be used to estimate mortality. Little information is available to quantify species-specific vulnerability to mortality at power lines; the available literature over-represents particular bird groups and habitats, and most studies only sample and present data for one or a few species. Furthermore, additional research is needed to clarify whether, to what degree, and in what regions populations of different bird species are affected by power line-related mortality. ***Nonetheless, our data-driven analysis suggests that the amount of bird mortality at U.S. power lines is substantial and that conservation management and policy is necessary to reduce this mortality.*** (emphasis added)

**Lighting:**

- Concerns are repeated here for potential of FAA required lighting or colored ball placement on new taller poles and conductors.
- This would degrade dark skies and scenic vistas that would impact quality of life, property values and tourism draw that are based on a less industrial appearing rural experience.

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<sup>32</sup> <http://www.plosone.org/article/fetchObject.action?uri=info%3Adoi%2F10.1371%2Fjournal.pone.0101565&representation=PDF>

**C – NATIVE AMERICAN  
TRIBES/GROUPS**





**CALIFORNIA PUBLIC UTILITIES COMMISSION /  
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company  
Master Special Use Permit and Permit to Construct  
Power Line Replacement Projects**

**Draft Environmental Impact Report/Environmental Impact Statement**

**Written Comment Form\*  
(please print)\*\***

Comments that will be most useful during this review should focus on the adequacy of the analysis or the merits of the proposed action or alternatives considered. Comments should be as specific as possible.

Name\*: JEREMY P. ZAGARELLA 10/1/14  
 Affiliation (if any):\* PAUMA BAND OF MISSION INDIANS  
 Address:\* P.O. Box 369  
 City, State, Zip Code:\* PAUMA VALLEY CA 92061  
 Telephone Number:\* 760-500-6982  
 Email:\* jeremyzagarella@hotmail.com

- The Tribe would like to be present during any work done on and near tribal lands. The tribe would like to be there to monitor for any cultural concerns.

- Again, any work done on the Pauma/Yuima Federally Recognized tribe / reservation would need to have a Tribal Monitor from the Pauma Band of Mission Indians

\*Please either deposit this sheet at the sign-in table before you leave today or mail to the address on the reserve side. Attach additional sheets if needed. Comments can also be emailed to [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com). Please have the subject line of emails read "SDG&E Master Permit – DEIR/DEIS Comments" using common formats such as .doc, .docx, .pdf, .rtf, or .txt.

\*\* Please print. Your name, address, and comments become public information – see reverse for additional information.

## Written Comment Form

Information is available on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>

The Forest Service action is subject to comment pursuant to 36 CFR 218, Subparts A and B. Only those who submit timely project-specific written comments during a public comment period are eligible to file an objection as part of the Forest Service project-level predecisional review process. Individuals or representatives of an entity submitting comments must sign the comments or verify identity upon request.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your name, address, or other contact information that you provide, including your email address—will be placed in the project file and shall become part of the public record. Comments are also posted online as part of the public record. The CPUC and Forest Service cannot approve requests to withhold contact information from the public record. Anonymous comments will be accepted; however anonymous comments do not establish eligibility to participate in the Forest Service predecisional review process.

To ensure that comments will be considered, the CPUC/Forest Service must receive written comments on the DEIR/DEIS by the close of the public review period (November 4, 2014). Written comments on the Joint DEIR/DEIS can be submitted via:

**U.S. Mail:** Lisa Orsaba, California Public Utilities Commission/Will Metz, United States Forest Supervisor, Cleveland National Forest, c/o Dudek, 605 Third Street, Encinitas, California 92024.

**Email:** [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com), with a subject line “SDG&E Master Permit – DEIR/DEIS Comments” using common formats such as .doc, .docx, .pdf, .rtf, or .txt.

***Public Review Ends: November 4, 2014***

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**From:** CourtCoyle@aol.com  
**Sent:** Tuesday, November 04, 2014 1:36 PM  
**To:** CNFMSUP  
**Cc:** slharvey@fs.fed.us; Katy.Sanchez@nahc.ca.gov; lhaws@sycuan-nsn.gov  
**Subject:** SDG&E Master Special Use Permit - DEIS/R Comments

**Re: Joint DEIS/R Master Special Use Permit and Permit to Construct Power Line Replacement Projects; SCH No. 2013091070; FS Publication No. R5-MB-277**

These comments are submitted on behalf of Carmen Lucas, Kwaaymii Laguna Band of Indians. As a threshold matter, Ms. Lucas believes there was insufficient time to adequately survey and study the known sites and that the DEIS/R was not written in language understandable to the public. It should also be noted the San Diego Union Tribune ran an article (October 23, 2014) stating that the project's comment deadline would be November 30. We, and others, have acted on reliance on that article (the date correction was not widely circulated). An extension of the comment deadline would be appreciated.

**I. FINAL "Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in support of the Proponent's Environmental Assessment" Confidential, ASM, April 2011:**

Ms. Lucas is a lineal descendant to the people whose cultural resources, sacred places and scenic vistas would be adversely impacted and affected by the proposed project. Our primary concerns are five fold.

First, Ms. Lucas was not consulted on the project or the cultural report. Why not? Consultation must occur prior to project consideration.

Second, she was not included in the cultural surveys. Why not? Her views on the identification, evaluation and treatment of cultural resources within her Band's traditional lands must be solicited prior to project consideration. Were any Native Monitors included? If so, they should be listed in the Methods section.

Third, Ms. Lucas was not included in the development of mitigation measures. Why not? Tribes' views must be considered, particularly regarding sacred areas, prior to project consideration. Mitigation under CEQA and federal statutes is not limited to data recovery. Where is the mitigation that would benefit tribes and tribal cultural resources?

Fourth, it appears that no ethnographic research was done to support the Report's and DEIS/R's apparent conclusions that no sacred places, traditional cultural properties or cultural landscapes would be adversely impacted or affected by the project. (DEIS/R page D 5-50). The SHPO requires that such reports be done prior to decision making on a project. Why weren't these reports done here especially given the acknowledged areas of very high cultural sensitivity in the project areas?

Also, why does neither the Report nor the DEIS/R make evaluations of traditional cultural locations as Traditional Cultural Places [sic: Properties?](Report, page 20)? Why has there been apparently no consultation with affiliated tribes? Without such evaluations and consultations, the Report (and DEIS/R) is incomplete and impacts remain unaccounted for -- SDG&E project after project after project. (Please revise references at pages 20 and 21 from "Laguna Ranch" and "Mount Laguna" to "Laguna Reservation/Lucas Ranch, Laguna"). The documents (DEIS/R, page D 5-3) also do not consider that so-called "isolates" by archaeologists may have tribal cultural value and may be contributing components of TCPS, historic districts and Cultural Landscapes.

Fifth, it does not appear the Report was done to accommodate the Forest Service's protocols, but instead, only those of the proponent SDG&E. This is particularly evident in the Report pages 9-11 in which site control appears exclusively to be within SDG&E's authority - not the Service, the landowner, the SHPO, NAHC, the coroner or the MLD. Also, avoidance must be considered instead of defaulting to data recovery. To the extent the DEIS/R relies on this Report, this entire section must be revised, the DEIS/R corrected and the proper protocols be reflected on the construction documents.

Similarly, specific to the ASM Report, it appears it was conducted pursuant to CEQA only. (Report, page 2). Where is the federal analysis including that relative to NEPA, NHPA, NAGPRA, AIRFA, etc.? Bare references to statutes (such as those in the DEIS/R) does not equate to project level analysis.

Report, page 4 states that "no known sacred sites" were indicated by a records search of the NAHC. There are known sacred sites within the project area; if the NAHC search did not reveal them, it may be because they have yet to be submitted to the NAHC, not that they aren't "known". The Report should correct its language to avoid giving false impressions about the nature of the area.

Report, page 4 states that none of the 95 documented traditional cultural locations and two archaeological districts in Kumeyaay territory are "within the APE." Yet, the APE appears undefined. It is very likely that the APE was improperly narrowly drawn to reflect only the direct impact or effect area to archaeological sites, and does not reflect indirect impacts, visual impacts, and other impacts to the setting and cultural context of the sites. What is the cultural resource APE? Is it 90 foot from centerline as the existing facilities survey buffer? (DEIS/R D 5-2). Why is this not clearly stated and depicted on a graphic? Why does the APE only consider direct impacts to archeological sites?

Report, page 9 states that additional environmental review will be necessary if grounding wire trenches are required. Please describe the nature of that review and whether tribal entities and the public will have an opportunity for involvement in that review. If there is no future public review, the current documents must be of sufficient detail. Currently they are not.

Report, page 9 states that survey access could not be granted to parcels on the right-of-way. Please explain the implications of this and which parcels were unsurveyed, the likelihood of tribal cultural resources and how and when this will be rectified and not impact cultural sites.

Report, page 22, appears to use the "Legends of the Cuyamacas" as the source for the sacred places list. The text and reference section should give credit to Mary Elizabeth Johnson (1914). (Ms. Lucas' Grandmother Maria Alto gave those legends to the author so that they would be recorded). Also, replace reference on this page from Kumeyaay to "Kwaaymii."

## **II. DEIS/R:**

We understand that few tribes have been participating in the project. In part this may be due to the way the project has been captioned which may hide the nature and level of impacts. Pole replacement may be a misnomer, as poles are not necessarily going into the same old hole, but in fact may be impacting new resources. It is also a misnomer as the new poles are wider and taller, thereby creating a greater footprint and shadow on the land. Why were impacts to cultural resources, for example, not listed in the Areas of Controversy section of the document? What tribes have consulted on the project? Why is this not reflected in a section of the DEIS/R?

The Statements of Impacts/Adverse Effects is inconclusive. In stating that "If SDG&E adheres to the avoidance and mitigation measures" found in certain tables that "the project will reduce any impacts to the archaeological sites" to insignificance provides no contingency if the measures are not or cannot be followed in a particular instance. What is the reporting program for measure adherence and effectiveness? What is the process for discussion of further mitigation?

The purpose and need for the project is also unclear: is this project really only about fire hardening or is there also an element of increased capacity, or at minimum, of laying the framework for increased capacity in the future, including to support the utility-scale renewable projects in the backcountry and desert? Does this project relate to or support the DRECP, which is currently out for public review? Please clarify. Also, please provide a summary and technical references to support the effectiveness of the project design to support fire hardening.

To assess the overall project, it would be helpful to have a chart or table with the following information: How many poles will be emplaced? How many will be in the same hole? How many taken out of service? Wire width and capacity? Also indicate the height difference and width difference between existing and proposed poles. How many are in cultural sites? Will be removed from cultural sites?

It is clear to my client that the cumulative impacts and growth induction that, taken together, the proposed project and those projects listed at DEIS/R section F will eliminate the San Diego backcountry and rural country along the I-8 corridor, Jacumba, Boulevard, Pine Valley, Viejas Grade and Julian, Rincon, etc. In fact, the project could more accurately be titled: "Wood to Steel to Support Cumulative Scenario." That corridor has been known as the Yuma Trail since prehistoric times. Yet, no mitigation is proposed for the cumulative loss or degradation of those values. Why not?

Also, regarding cumulative impacts, the documents lack specificity about the projects in the cumulative table. For example, how do the SDG&E TL 6914 Wood-to-Steel project and SDG&E TL637 Wood-to-Steel project (from Cumulative Table F-2) relate to the proposed project? We understand that SDG&E initially tried to undertake the proposed project as a maintenance project. Is the current pole replacement project at Volcan Mountain Preserve (County lands), apparently done under a maintenance exemption, related to the proposed project? Was it piecemealed off this larger project? That project has been recently shut down after ancestral human remains were identified by the coroner in two cultural areas. (We incorporate by reference the prior emails we submitted to you on this subject). We also understand that work was started in one area without a monitor in an area that was shown on the plans as requiring a monitor. Please explain how such lapses will be avoided in the proposed project.

Regarding alignments, it appears that supplemental or subsequent environmental review will be required as the current documents do not appear to contain a sufficient level of detail on the alignment locations. Such information must be publicly reviewed so that impacts may be avoided and mitigation considered.

Regarding roads, how will access roads that are no longer needed be retired or restored? A map showing all those roads and segments would be helpful to understand that component of the project. Also, helicopter settings of poles should be considered to avoid impacts to cultural areas.

Regarding staging and storage areas, stringing sites, fly yards, guard structures, etc., they must each be located outside of cultural areas and fully restored after use. Is there a graphic displaying where all such areas are proposed?

Regarding visual resources, based on the visual simulations and other information, my client concurs that the project's impacts/effects are significant and unmitigable/unavoidable for both NEPA and CEQA. My client believes that additional mitigation must be proposed to try to offset these impacts to cultural settings and experiences. It would be preferable if the poles were no higher than the tree line. If undergrounding is to occur at Laguna, it must not be done in the cultural deposit.

Regarding water supply, better monitoring and less pressure on the groundwater in Laguna Mountain is requested. Ms. Lucas has been on record for over 15 years with the Service regarding the concern of drawdown and its effects on the overall environment and ability to support the native plant and wild life. Her concerns have only deepened with the drought over the last several years. The DEIS/R states that private groundwater extraction operations would be a project water source, but these operations are not named in the text. (i.e.,

DEIS/R, page B-57). Please list these sources for private water, where they are located and how water would be transported in each case.

### **III. Impact Levels and Mitigation:**

Based on the above, we disagree that the proposal's significant adverse effects are reduced to a level of insignificance.

Because of the extent and nature of the impacts and effects, other avoidance, treatment and mitigation measures are warranted beyond those stated in the Report at pages 7-12 and the DEIS/R at section D:

The Forest Service must adopt a protocol requiring realignment so that all poles and access roads will be removed from cultural sites, not placed within 2-4 feet of an existing pole as the Report seems to indicate (pages 8-10). It appears that Cuyamaca Rancho State Park has been able to realign poles. Why can't the Forest Service? Once the lines are hardened, it is unlikely they will be removed in the future. We understand the leases are expired. Now is the time to act.

We understand that detailed avoidance measures and plan redesigns may have been developed by SDG&E but that these must be implemented during construction even if construction commences years later. This means that the companies doing the construction need to have clear requirements in their construction documents reflecting what SDG&E environmental staff and consultants spent time and resources developing. It must be made clear that these requirements are feasible and conditions of project approval and must be followed or else environmental review and consultation must be reopened.

The Forest Service must require both archaeological and tribal monitors any time there is the potential for impacts to tribal cultural resources. These resource professionals must be qualified and have experience in local conditions.

The Forest Service should require a buffer of greater than 5 meters beyond the outer limits of the "site" extent as demonstrated by surface or subsurface indications. What evidence is there that such modest buffers are adequate? Will greater buffers or project relocation be required if subsurface works reveals the site is larger than previously recorded?

The Forest Service must develop meaningful consequences for violations of the protocol by the applicant. It has been our experience on other projects (Sugarloaf, Sunrise Powerlink, Volcan Mountain, etc.) that SDG&E (or its agents) routinely violate the conditions of project approval. The consequences and penalties for violations must be clearly spelled out in the DEIS/R and enforced.

A Cultural Sensitivity Training Program, with modules taught by tribal entities, must be required by the Forest Service and be mandatory for any employee prior to them entering the field. Examples in the energy field for successful sensitivity programs include those at Ocotillo Wind Express and Topock Groundwater Remediation Project.

A Cultural Resource Fund to be created to provide funding for: the pursuit and completion of California and National Register listings within and near the Forest and acquisition of properties with tribal cultural values. Does the Service have a wish list of properties for nomination and acquisition?

Creating a bike trail/lane on Sunrise and Cuyamaca Highways so there is less pressure on trails and drivers in the Forest.

Finally, the Forest Service must consult with Ms. Lucas regarding mitigation specific to the Kwaaymii. Reasonable, feasible mitigation that would reduce significant impacts and effects has not been adequately considered. We would be happy to discuss the nexus and proportionality of each of these measures in consultation:

- Qualified Native Monitors be required throughout Laguna and Cuyamaca areas and that the Kwaaymii be represented including as MLD;
- Forest Service clear and maintain the remainder of the historic road south of Lucas Ranch (on the 1928 aerial map) that connects to the Nobel Canyon Road for fire safety purposes;
- Forest Service require that SDG&E provide power to the Lucas Ranch cabin for fire safety purposes; and
- Forest Service remove or provide an offset for the covering of the southeast property corner of Lucas Ranch by the Forest Service Road.

We appreciate the opportunity to comment and look forward to receiving any further environmental review, responses to comment, mitigation or monitoring reporting programs, draft operation and maintenance plan and historic properties management plan in hard copy sent to my attention. Please contact me to set up consultative meetings.

Very truly yours,

Courtney Coyle

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*"Protecting and Preserving Tribal, Cultural, Biological and Park Resource Landscapes"*

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**D – COMMUNITY GROUPS,  
NON-PROFIT, AND PRIVATE  
ORGANIZATIONS**



# BOULEVARD PLANNING GROUP

PO Box 1272, BOULEVARD, CA 91905

**DATE:** October 17, 2014 (amended 10-18-14 with DRECP information @page 10)

**TO:** San Diego County Planning & Development Services

**VIA:** [Sheri.McPherson@sdcounty.ca.gov](mailto:Sheri.McPherson@sdcounty.ca.gov); CC: to CPUC & USFS VIA: [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)

**FROM:** Donna Tisdale, Chair; 619-766-4170; [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

## **RE: SDG&E Master Special Use Permit – DEIR/DEIS Comments**

As directed by the County, these comments are addressed to San Diego County Planning & Development Services and copied to the CPUC and US Forest Service.

SDG&E's application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects Docket Number A.12-10-009<sup>1</sup> is another link in their east west expansion plan, to connect renewable energy projects in Imperial County, East County, and Northern Baja California with energy hungry urban areas along the coast.

**After a public discussion at our regularly scheduled meeting held on October 3<sup>rd</sup>, the Boulevard Planning Group unanimously approved the following motion on SDG&E's Master Special Use Permit:**

- *Authorize the Chair to submit comments and recommend undergrounding (TL6931) between the new Boulevard substation and Crestwood Substation; from the Crestwood Substation to Cameron Substation (TL629); and more if possible.*

The Group's goals are to further reduce fire ignition sources, the potential for increased lightning strikes, and impediments to fire fighting; to protect adjacent residential and riparian areas; and to improve scenic vistas along Historic Route 80 that TL6931 generally follows east to west.

Historic Route 80 is designated scenic by the County with extensive views of adjacent chaparral covered rolling terrain, oak studded valleys and creek beds, and distant ridgelines that will be degraded by taller metal poles with additional and thicker lines (conductors) that appear much more visible and reflective than the lines that are being replaced. Taller poles will place infrastructure more in the line of vision of drivers along Historic Route 80 than existing lines, especially in the area between Tule Jim in Boulevard and Buckman Springs Road in Campo.

### **Comment limitations:**

- Due to the County's request for these comments by October 17<sup>th</sup> the amount of time for full review and comment has been reduced.
- Due to the reduced timeframe and other obligations these comments are limited in scope, thoroughness, and proper editing.

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<sup>1</sup> <http://www.sdge.com/regulatory-filing/3404/sdge-south-orange-county-reliability-enhancement-socre-project>

### Concerns with Assigned Commissioner Peevey:

- Recent allegations of wrong doing filed against Commissioner Peevey, with requests for investigations by the Attorney General, do raise concerns.
- Commissioner Peevey recently announced that he will step down at the end of his term in December and not seek reappointment.
- Assignment of a new Commissioner to this project seems appropriate, sooner rather than later.

### Dudek's poor track record with environmental review and 3<sup>rd</sup> party mitigation and monitoring with ECO Substation, Tule Wind, Soitec Solar and /or related projects is very discouraging:

- A CPUC response from staff attorney, John Reynolds, to a Public Records Act Request (reference # 1199), dated 7-24-14, confirms the CPUC was unaware of any groundwater monitoring conducted within one mile of groundwater wells used during construction of the ECO Substation project, where Dudek is the 3<sup>rd</sup> party monitor.
- MM HYD 3 for ECO Substation required monitoring to ensure no adverse impacts to groundwater production rates to wells within 1-mile radius.
- Major concerns and challenges have also been raised with Dudek's groundwater investigation for the Soitec Solar projects proposed in Boulevard.
- San Diego County's Planning & Development Services required Dudek to revise the Soitec groundwater investigations to include many project water uses that had been excluded from the original and exposed by Boulevard and Jacumba residents and planning groups.

### Executive Summary:

- No proposed project or selected alternatives maps are included in the Executive Summary—they should be
- The BIA proposed alternative should include undergrounding of lines through Campo Reservation lands that pass by their Golden Acorn Casino project and tribal housing.
- **ES 4.4.2:**
  - This section references fire hardening 6 miles of existing 69kV TL6931 and adding a circuit through Boulevard
  - Or...modify existing TL625 by constructing a new 3-mile double circuit loop-in into the Suncrest Substation.
  - ***Another alternative would be to modify TL625 by undergrounding a new 3-mile double circuit loop in to the Suncrest Substation and leave TL6931 as is.***

### B.2 Project Location—is misleading

- Fails to include Boulevard
- Fails to include Boulevard's TL6931 that is now part of so-called Environmentally Superior Alternative

### E.3.3.2 Removal of TL626 from Service = reconstruction of TL6931 and major new impacts for Boulevard/ Campo tribal lands & a connection with ECO Substation that could transfer much more future energy through those predominantly low-income communities

- At first glance removal of TL 626 in the Cleveland National Forest sounds like a very good idea.
- However, the late addition of the so-called Environmentally Superior alternative includes Reconstruction of TL6931 from Boulevard Substation to Crestwood Substation through residential, undisturbed, sensitive and scenic areas of Boulevard and Campo tribal lands, alongside Historic Route 80 that San Diego County has designated a scenic highway.
- TL6931 was previously part of SDG&E's A.12-12-007 for Shu'luuk Wind gen-tie/fire hardening application<sup>2</sup> that was withdrawn with the Campo Band's General Council denial of the Shu'luuk Wind lease agreement with Invenergy.
- The public environmental review process was never completed for upgrading TL6931 through Boulevard between the Crestwood Substation and the new expanded Boulevard Substation.
- TL6931 is located in a an area of Boulevard / Campo Reservation where the majority of the chaparral, riparian areas, oak groves, open grazing lands and scenic vistas have not burned in 40 years, according to the Fire History 2014 that includes 2014 fire perimeters as of 8-4-14 (with exception of the Old Fire that burned near Golden Acorn Casino)
- This Boulevard/Campo section of line should be placed underground to reduce visual impacts, impacts to residents and birds, and impacts to fire fighting tactics, similar to what ALJ Yacknin required for the ECO Substation's new 138kV line through along Historic Route 80 between ECO Substation and Carrizo Gorge Road and through Boulevard's Jewel Valley from the border area to the Boulevard Substation rebuild.
- A future expansion was built into the CPUC ECO Substation approval that allowed for the installation of two 138kV lines in the underground sections through Jacumba and Boulevard Planning Areas. Completion is expected in November 2014.

**E.4.3 Environmentally Superior Alternative = defacto future high voltage connection to SDG&E's 85-acre ECO Substation, SDG&E's Southwest Powerlink, SDG&E's Sunrise Powerlink, and SDG&E's cross border Energia Sierra Juarez Wind project**

- Table E-3 shows the so-called Environmentally Superior Alternative includes removal of TL626 and replacement with electric facilities within the existing electric utility ROWs:
  - Reconstruction of TL 6931 (in Boulevard)
  - Conversion of 13 miles of TL262 to 12kV
  - Note 1: "Reconstruction of TL 6931 compared to developing the TL625 loop-in along the Sunrise Powerlink would rank similarly in terms of number of adverse impacts created vs reduced or eliminated.
  - Reconstruction of TL6931 is ranked higher reportedly due to the extensive work completed for TL6931, which provides a knowledge base that reduces the risk of impacting environmental resources (Sources: SDG&E 2012 PEA)..."
  - For the record, TL6931 Fire hardening included a new 138kV line within a new and wider Right of Way, although SDG&E was not successful in securing all the expanded easements for the private Gen-tie line, including the Campo Reservation where the new Shu'luuk Wind turbine project was proposed and then rejected by the tribe's general council vote.

**SDG&E's A.12-12-007 to the CPUC for their proposed \$34 million (+-10%) TL 6931 Fire Hardening / Wind Interconnect Project Docket Number was dismissed /closed as of March 6, 2014<sup>3</sup>**

<sup>2</sup> <http://www.sdge.com/regulatory-filing/3968/sdge%E2%80%99s-application-permit-construct-tl-6931-fire-hardeningwind-interconnect>

- With CPUC Decision D.14-03-001, SDG&E's A.12-12-007 was dismissed and closed upon SDG&E's written and unopposed request, after the Campo Band voted down the lease for Invenergy's Shu'luuk Wind turbine project.
- SDG&E's PEA for the original Fire Hardening and Shu'luuk Wind gen-tie project (A12-12-07) was for a double-circuit 138kV line with an expanded easement from 25 feet to 100 feet.
- includes staging areas in environmentally sensitive areas within Boulevard Planning Area in flood plains and adjacent to riparian areas, oak groves and Historic Route 80 which is also a scenic route (see Figures 3-2; 3-2A; 3-2B and 3-2C)
- The related environmental review /public review process was never completed, and no new information appears to have been provided for the current MSUP application. This is the same bait and switch process that Boulevard and other communities were subjected to with the belated introduction of the so-called Environmentally Superior Sunrise Powerlink.
- If selected, this section of the line should be placed underground due to the close proximity to numerous homes, oak groves and riparian areas between Boulevard and the Cameron Substation on Buckman Springs Road (Campo Creek, Miller Valley Creek, La Posta Creek, etc)
- SDG&E's response to the data request<sup>4</sup> (at page 9) includes the following response explaining why the fire hardening work stopped at the point where the Shu'luuk Wind project gen-tie interconnect does not continue the entire length of TL6931:
  - San Diego Gas & Electric Company (SDG&E) currently has a 24 foot wide easement in perpetuity for the single circuit wood portion of TL6931 on Campo Tribal Land.
  - Because the TL 6931 Fire Hardening/Wind Interconnect Project will be built in a double circuit 138kV configuration, additional easement width is needed within Campo Tribal Land to accommodate the proposed 100 foot wide easement.
  - Unfortunately, SDG&E and the Campo Tribe were unable to reach agreement on the land value and terms for SDG&E to purchase additional easement across the Campo Reservation. Consequently, the tribe has elected to interconnect the Shu'luuk Wind Project with SDG&E at the eastern boundary of the Campo Reservation where TL6931 exits tribal land.
  - SDG&E lists Approximately 50 impacted Boulevard properties (at page 50)<sup>5</sup>

**With the late addition of the proposed Environmentally Superior Route, the CPUC and SDG&E seem to be pulling another bait and switch with Boulevard receiving the blunt end of the stick, similar to the late addition of the CPUC's so-called Environmentally Superior Southern Route of the Sunrise Powerlink through Boulevard and other disproportionately impacted rural communities.**

- Here, TL6931 through Boulevard will now be upgraded to provide a missing link in SDG&E's incremental / piecemealed expansion of another high voltage east west line that can serve to open capacity on the Southwest Powerlink (SWPL) and /or the Sunrise Powerlink.
- TL6931 connects to the new expanded Boulevard Substation and SDG&E's \$435 million ECO Substation.
- SDG&E's ECO Substation map<sup>6</sup> shows the connection to the new Boulevard Substation and also shows their Sunrise Powerlink's end point at Sycamore substation

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<sup>3</sup> <http://www.sdge.com/regulatory-filing/3968/sdge%E2%80%99s-application-permit-construct-tl-6931-fire-hardeningwind-interconnect>

<sup>4</sup> [http://www.cpuc.ca.gov/environment/info/dudek/Wind\\_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201\\_03-05-13\\_COMBINED.pdf](http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201_03-05-13_COMBINED.pdf)

<sup>5</sup> [http://www.cpuc.ca.gov/environment/info/dudek/Wind\\_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201\\_03-05-13\\_COMBINED.pdf](http://www.cpuc.ca.gov/environment/info/dudek/Wind_Interconnect/TL6931%20Fire%20Hardening%20-%20WI%20PEA%20Data%20Response%20No.%201_03-05-13_COMBINED.pdf)

<sup>6</sup> <https://www.sdge.com/sites/default/files/documents/ECOSubstationProjectMap.pdf>

- The ECO Substation connects to SDG&E’s Southwest Powerlink (SWPL) and Sempra’s new Energia Sierra Juarez cross-border line with 1,250 MW of capacity.
- According to SDG&E’s project application, their ECO Substation is built to handle expansions up to approximately 4,800 MW with multiple 500kV lines, 230kV lines and 138kV lines.
- The substation is designed so that it will ultimately be expanded to include the following components<sup>7</sup>:
  - Five 500 kV bays in a breaker-and-a-half bus configuration
  - Nine 230 kV bays in a breaker-and-a-half bus configuration
  - Nine 138 kV bays in a double-bus/double-breaker configuration
  - Four 500/230 kV, 1,100 megavolt ampere (MVA) transformer banks with two single-phase operational spares
  - Three 230/138 kV, 224 MVA transformer banks
  - One or more 500 kV series capacitors
  - Two 230 kV, 63 MVAR shunt capacitors
  - Four 12 kV, 180 MVAR shunt reactor banks
  - One 230 kV static VAR compensator
  - The maximum amount of oil required for the transformers at the ECO Substation will be approximately 569,800 gallons.
- SDG&E’s MSUP project website includes links to all TL lines except TL6931<sup>8</sup>. Why?
- SDG&E’s project Fact Sheet and map<sup>9</sup> do not include the belated addition of TL6931 through Boulevard’s occupied residential and ranch lands
- **SDG&E’s \$135 million Sycamore to Penasquitos 230 kV Transmission Line CPCN Project Docket Number: A.14-04-011 is another link in SDG&E’s east west high voltage line expansion<sup>10</sup>.**
  - SDG&E’s project map for their Sycamore to Penaquitos link shows their new 230kV line and consolidation of two existing 69kV lines onto new steel poles, starting at the Sycamore Substation<sup>11</sup>.
  - Figure 3.1<sup>12</sup> shows the regional location of this piece of SDG&E’s incremental expansion plan.
  - The project description at page 7<sup>13</sup> states that SDG&E’s ability to operate its bulk electric transmission system reliably and efficiently has become constrained, particularly at gateway substations. During periods of high customer demand and high energy imports, as well as during periods of high renewable energy generation in the Imperial Valley, most of the energy imported into San Diego flows across the 500 kV Southwest Powerlink and Sunrise Powerlink transmission lines. This imported energy then flows into the Miguel and Sycamore Canyon Substations, respectively. Heavy energy flows into these gateway substations can result in congestion and subsequent NERC reliability criteria violations on the 230 kV, 138 kV, and 69 kV transmission and power lines downstream, requiring dispatch of less efficient generation, increasing energy cost for ratepayers and eventually requiring upgrades to these downstream facilities... In addition, significant renewable generation is expected to be developed in the Southeastern United States, which will further increase flows on the Sunrise Powerlink and into Sycamore Canyon Substation.

<sup>7</sup> <https://www.sdge.com/sites/default/files/documents/ECOAppPermittoConstruct.pdf>

<sup>8</sup> <http://www.sdge.com/key-initiatives/cleveland-national-forest-maps>

<sup>9</sup> [https://www.sdge.com/sites/default/files/documents/1717237822/FINAL%20S1380238%20ClevelandNatForestPoverline\\_FS.pdf](https://www.sdge.com/sites/default/files/documents/1717237822/FINAL%20S1380238%20ClevelandNatForestPoverline_FS.pdf)

<sup>10</sup> <http://www.sdge.com/regulatory-filing/10646/sdge-sycamore-penasquitos-230-kv-transmission-line-cpcn-project>

<sup>11</sup> <http://www.sdge.com/key-initiatives/sycamore-penasquitos-230kv-transmission-line-project-map>

<sup>12</sup> <https://www.sdge.com/sites/default/files/regulatory/3.0%20-%20Project%20Description.pdf>

<sup>13</sup> <https://www.sdge.com/sites/default/files/regulatory/A.14-04-011%20SDGE-SXPQ-CPCN-Application-Vol1.pdf>

## **D.8 Fire & Fuels Management errors & omissions**

- **Figure D.8-1: Boulevard and TL9631 are omitted from this fire hazard map**
- D.8-11: The rural communities of Boulevard, Campo, and Portero are impacted by this project, are located in wildfire corridors with continuous fuel beds, and yet they are inexplicably left out of the list of Communities at Risk
- D.8-15: Under Tribal Fire Departments, the Campo Reservation Fire Department's vehicles and equipment are listed. Where is the documentation on the number and training of related personnel / boots-on-the-ground that are generally available to operate the equipment?
- Campo tribal members have confided/ alleged that their fire department staffing has been reduced and pay for some tribal members is below minimum wage.
- Factual information on paid / volunteer staffing levels for all must be included.
- A new Boulevard Fire station is under construction.
- When completed, the White Star Fire Station will be closed and Cal Fire will reportedly move to Boulevard Fire station.
- Boulevard previously had both a volunteer fire department and Cal Fire's White Star
- Boulevard is getting less protection.
- Some of our project mitigation funded and community funded fire-fighting equipment has been sent to other communities by an ever changing list of those in charge at Cal Fire, Rural Fire, San Diego County Fire Authority.

## **D.9 Hydrology**

- SDG&E's ECO Substation list of hazardous materials includes soil stabilizers
- TL6931 is omitted from this section as are the related blue line streams that it crosses
- The Campo-Cottonwood Creek Sole Source Aquifer designation / boundaries are not included. This is one of only two such designations in Southern California
- San Diego County's Guidelines for Determination of Significance and Groundwater Ordinance do not take Climate Change impacts into account
- MM HYD2a is inadequate based on SDG&E's vastly inadequate and underestimation of amount of water needed and the controversial and questionable groundwater use during construction of their ECO Substation project.
- 30 million gallons was estimated and amended to 90-100 million gallons of water
- MM HYD-2b is also inadequate based on current experience with CPUC handling of water supply sources, failure to vet SDG&E's reports and project modification figures, failure to implement mitigation measures for ECO Substation.
- No local groundwater resources should be used
- There is little to no oversight of local water districts or tribal wells
- SDG&E should be required to import water for this project

## **F. Cumulative Scenario and Impacts—errors & omissions:**

- Errors and omissions downplay the real world impacts to the environment and wild life, fire-prone and drought stricken rural communities, and a wide variety of natural resources, which are significant, cumulatively significant, and represent disproportionate impacts in the predominantly low-income communities Boulevard and Jacumba Hot Springs.

## **Figure F-1 Cumulative Projects Map—errors & omissions:**

- **Failure to include TL6931 which is now part of the so-called Environmentally Superior Alternative**

- **Map ID T-3: Failure to include major details/impacts of SDG&E ECO Substation project where Dudek is the 3<sup>rd</sup> party monitor and should be fully informed.**
- Failure to adequately identify and document the scale and scope of the majority of SDG&E's \$435 million 85 acre ECO Substation (500/230/138kV),
- **Failure to include or identify the Boulevard Substation Rebuild site location**
- **Failure to include the 14 miles of new 138kV line(s) connecting ECO and Boulevard Substations**—all of which is currently under noisy and visually intrusive construction for a majority of the route between Jacumba Hot Springs and Boulevard, as depicted by two photographs below.
- **Failure to include Ocotillo Wind's existing 265 MW 12,436 acre footprint**
- **If Figure 1 includes a few projects in Imperial County, it should be corrected to include all the renewable and transmission projects already approved and /or proposed on BLM lands using their list<sup>14</sup> and map<sup>15</sup> dated July 2014.**
- **It should also include all energy/transmission projects approved and proposed in Imperial County** using the maps<sup>16</sup> and project lists (as of 10-1-14)<sup>17</sup> posted on their Planning and Development Services website.
- **Much of the energy generated by Imperial Valley renewable is or will be transmitted through rural East County** on existing, proposed, and alternative transmission proposals currently under review by the CEC, CPUC, IID, and CAISO.
- **ECO Substation project construction water use was estimated at 30 million gallons and was amended repeatedly for up to 90-100 million gallons**—outside public comment period.
- **As of May 31, SDG&E had already exceeded the estimated 1.5 million water truck miles** and provided invalid and misleading information to the CPUC project manager as documented in the attached letter from attorney Stephan C Volker dated 4-17-14, challenging SDG&E's water use and mileage numbers presented in their **East County Substation, Minor Project Refinement Request 14 (A.09-08-003)**.
- **Cumulative construction water use/ sources and related GHG emissions must be included.**
- **Map ID-Wind 4 project marker fails to accurately portray the immense scale and scope Iberdrola's approved 186 MW Tule Wind project and over 12,000 acre footprint** on BLM land looming over the McCain Valley / Manzanita Reservation/ La Posta/ Thing Valley areas between Boulevard and La Posta Road.
- **It fails to include the Tule Wind gen-tie route or system of overhead collector lines.**
- **It fails to show Tule Wind's turbine project footprint approved last December for Ewiiapaayp tribal lands** or turbines proposed for State Land Commission School lands, or the extensive and intrusive network of approved overhead collector and gen-tie lines.
- **Map ID Wind 5 - National Quarries footprint falsely appears to be larger than the Tule Wind footprint.**

<sup>14</sup> <http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/solar.Par.84447.File.dat/BLM%20Solar%20Applications%20&%20Authorizations%20April%202013..pdf>

<sup>15</sup> [http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/application\\_maps.Par.30605.File.dat/CDD\\_Application\\_Map.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/pa/energy/application_maps.Par.30605.File.dat/CDD_Application_Map.pdf)

<sup>16</sup> <http://www.icpds.com/?pid=2934>

<sup>17</sup> <http://icpds.com/CMS/Media/Planning-Staff-Report-Updated-10-1-14.pdf>

- **Figure F-1 fails to show the proposed 5-6 mile 138kV gen-tie for Soitec Solar’s proposed 420 acre Tierra Del Sol Solar project in Tierra Del Sol area of Boulevard Planning Area, with a ROW through the foot print of the 2012 Shockey Fire that burned over 2,500 acres, 14 homes and resulted in one death in the Tierra Del Sol / Hi Pass neighborhood of Boulevard.**
- **Map ID S-3 Amonix Solar has reportedly been withdrawn and should be removed**
- **Map ID S-6 Fox Solar has reportedly been withdrawn and should be removed**
- **Map ID S-7 for Soitec’s LanWest and LanEast should have two separate numbers for two separate projects**
- **Map ID S-14 Solar Energy Project MPA13-009 by SDG&E fails to include total MW or acreage**
- **NextEra Energy’s new Jacumba Solar MUP application 14-041 is proposed for 300 acres adjacent to SDG&E’s ECO Substation<sup>18</sup> at the US/Mexico border east of Jacumba Hot Springs should now be included. It replaces BP’s previous Jacumba Solar project which is identified on F-1 as S2.**
- **Axio Power Holdings LLC has proposed the new Cameron Solar Energy Project (MPA-14-019) with 190 acres of PV to be installed in the beautiful and highly visible Campo Valley west of Lake Morena Drive near the entrance to Hauser Canyon.**
- **The Cameron Solar Energy Project plot plan shows the point of grid connection as SDG&E’s TL6923<sup>19</sup> that is involved in this MSUP DEIR/EIS; Dudek is listed on the plot plan provided by San Diego County to the Campo Planning Group, so they should have been aware of this cumulative impact project.**
- **Additional Solar projects already approved and /or constructed in the Borrego Valley should also be included.**
- **Figure 1-S1 Imperial Valley Solar-Solar Two, CACA 047740 should be removed; it is no longer listed on the website of BLM’s El Centro office<sup>20</sup>.**
- **Map ID F3 Lake Morena Community Defense (LMCD) Project:** The USFS scoping notice for the LMCD Project includes the following statement under Purpose & Need:
  - *“Finally, aerial suppression action may be limited in surrounding areas of Campo/ Lake Morena (Hauser Canyon/Lake Morena Drive/Buckman Springs Road/La Posta Road), due to Sunrise Powerlink. This alteration of the typical aerial suppression procedure may contribute to larger fire growth...” (emphasis added)*
  - The same alteration of the typical aerial suppression procedure, and contribution to larger fire growth, holds true for all of SDG&E’s proposed fire hardening projects, expansions, and cumulative impact projects that induce growth of additional fire ignition sources and fire fighting impediments in designated wildfire corridors and Very High Fire Severity Zones.

**For perspective on the scale, scope and visual blight, we are providing the photograph below of the current SDG&E ECO Substation project and related 138kV line through Jacumba Hot Springs and Boulevard Planning Areas.**

<sup>18</sup> [http://www.sandiegocounty.gov/content/sdc/pds/ceqa\\_public\\_review/MUP-14-041.html](http://www.sandiegocounty.gov/content/sdc/pds/ceqa_public_review/MUP-14-041.html)

<sup>19</sup> <http://www.cpuc.ca.gov/environment/info/dudek/CNF/ProjectLocationMap.pdf>

<sup>20</sup> <http://www.blm.gov/ca/st/en/fo/elcentro.html>

- Note the vehicles using the new steep slope access road for the 138kV line adjacent to the Sunrise Powerlink that was installed without access roads due to the sensitive nature of the area.
- Additional arms and wires can be installed on the new poles for future expansion purposes.
- Additional underground vaults have already been installed in the roadbed of Historic Route 80 and through underground section of Jewel Valley.

**Top photo was taken from Carrizo Gorge Road, south of I-8, looking west.**



**Bottom photo was taken from Historic Route 80, just west of Jacumba, looking south.**

**Old wooden home is now impacted by multiple high-voltage lines.  
Was the new 138kV line triple pole structure disclosed in the EIR/EIS?**



## **Additional transmission upgrades / cumulative impacts under consideration:**

### **The Desert Renewable Energy Conservation Plan (DRECP) DEIR/EIS<sup>21</sup> = 1-2 new 500kV lines through Eastern San Diego County along Sunrise Powerlink route as part of their infrastructure plan:**

- The DRECP's 2-page Preferred Alternative summary and map<sup>22</sup> shows a Development Focus Area covering virtually all of Imperial Valley farmland and some adjacent desert lands for potential renewable energy development, east of San Diego County.
- Energy will need to flow from Imperial Valley to the coastal cities, including San Diego, via SDG&E's system.
- The DRECP DEIR/EIS appendix K-Transmission and maps<sup>23</sup> show project alternatives 1-5 requiring one or two new 500 kV circuits through Eastern San Diego County along the Sunrise Powerlink route.
- Note the text boxes on the maps state that no existing lines are shown.
- The maps also state that the only substations that are shown are those included in the DRECP infrastructure plan.
- Related SDG&E substations included on the DRECP infrastructure plan maps include Imperial Valley Substation, Suncrest Substation, and Sycamore Substation.
- According to Appendix K, SDG&E and the CPUC are part of the DRECP planning process through the Transmission Technical Group created by the Renewable Energy Action Team in 2012.
- The DRECP appendix K maps are dated September 2013, so there was both knowledge and time for these infrastructure plan maps to be included as cumulative impacts.
- *However, Appendix K Table 4-2 does not appear to include the amount of land needed/ impacted for any new 500kV lines through Eastern San Diego County beyond the Borrego Valley. This is a significant omission.*
- *The DRECP includes a list of existing cumulative impact projects<sup>24</sup>.*
- *Those located in Imperial County and San Diego County, connected to SDG&E's project lines, other lines, their Imperial Valley Substation, ECO Substation, Sunrise Powerlink and Southwest Powerlink should be included in SDG&E's MSUP project: Ocotillo Express Wind; Centinela Solar; Imperial Solar Energy Center South; Campo Verde Solar, Mount Signal Solar; Solar Gen 2 (Arkansas, Alhambra, Sonora); NRG Solar Borrego 1; Sol Orchard 1-4, 6-10, 12-17;*
- *In addition, Soitec/Invenergy's Desert Green CPV project<sup>25</sup> is now under construction in Borrego and Imperial Valley Solar Energy Center west is currently under construction in Imperial County.*

### **Imperial Irrigation District's proposed Strategic Transmission Expansion Plan (STEP)<sup>26</sup>:**

- Expansion of IID's transmission system to accommodate up to 2,200 MW will connect with and impact SDG&E's transmission system, leading to expansion and/or upgrades through Eastern San Diego County.

### **The CAISO 2014-15 transmission discussion for moving energy out of Imperial County to San Diego<sup>27</sup>,**

<sup>21</sup> <http://www.drecp.org/draftdrecp/>

<sup>22</sup> [http://drecp.org/documents/docs/fact\\_sheets/DRECP\\_PREFERRED\\_Alternative.pdf](http://drecp.org/documents/docs/fact_sheets/DRECP_PREFERRED_Alternative.pdf)

<sup>23</sup> [http://www.drecp.org/draftdrecp/files/Appendix\\_K\\_TTG\\_Report.pdf](http://www.drecp.org/draftdrecp/files/Appendix_K_TTG_Report.pdf)

<sup>24</sup> [http://www.drecp.org/draftdrecp/files/Appendix\\_O\\_Existing\\_RE\\_Projects\\_within\\_Plan\\_Area.pdf](http://www.drecp.org/draftdrecp/files/Appendix_O_Existing_RE_Projects_within_Plan_Area.pdf)

<sup>25</sup> <http://www.invenergyllc.com/ProjectsbyCountry/UnitedStates/DesertGreen.aspx>

<sup>26</sup> <http://www.iid.com/index.aspx?recordid=362&page=30>

<sup>27</sup> <http://www.caiso.com/Documents/DraftSecondDiscussionPaper-ImperialCountyDiscussionPaper100814.pdf>

- The October 1<sup>st</sup> discussion paper<sup>28</sup> documents the need for new transmission projects/ upgrades or operational modifications, including footnotes 4-6 on page 4
- Those projects include new lines and upgrades at Imperial Valley Substation, Sycamore-Penasquitos 230kV line
- At page 8, an alternative SDG&E –Inland transmission route to Suncrest Substation/Sunrise Powerlink just east of Alpine, within the Cleveland National Forest

**October 8, 2014 California Independent System Operator’s Imperial County Transmission Consultation Workshop:**

- Aspen Environmental’s presentation (at request of CEC) at the CAISO stakeholders meeting included a September 2014 addendum<sup>29</sup> to the May 2014 report with transmission options for new lines/upgrades to replace San Onofre Nuclear generation:
- Maps showing land use study areas and onshore substations and transmission segments at pages 32 & 33 include Alternative 2: Alberhill to Suncrest and Alternative 5: Imperial Valley to Inland to connect to SDG&E’s Suncrest Substation through Cleveland National Forest and other lands
- **SDG&E Area Potential Mitigation Solutions found @ page 139 of CAISO presentation dated 9-24-14<sup>30</sup>**
  - ♣4 Network upgrades to address sub-transmission Category C issues
  - ♣Interim solutions prior to the IV PST in-service, including Coordinate with CFE and enable Otay Mesa–Tijuana 230 kV SPS as needed bypass series cap banks on NG-IV 500 kV line
  - ♣ By the time the IV PST project is in service, ultimate goal is to eliminate or minimize cross tripping the tie with CFE, including bypassing series cap banks on Sunrise and SWPL 500 kV lines swap BK81 position with BK80 in IV 500/230 kV substation three SPS to protect the main 500/230 kV system instant backup or new 500/230 kV bank at Miguel/ Suncrest/IV Coordination with CFE on IV PST operation procedure
  - ♣Energy Efficiency, DG, Demand Response, and Energy Storage

**ADDENDUM TO TRANSMISSION OPTIONS AND POTENTIAL CORRIDOR DESIGNATIONS IN SOUTHERN CALIFORNIA IN RESPONSE TO CLOSURE OF SAN ONOFRE NUCLEAR GENERATING STATION (SONGS) SEPTEMBER 2014 CEC-700-2014-002-AD:**

- **Figure 6 @ page 37 of the Schematic Map of Onshore Substations and Segments**, shows SDG&E proposed Alternative 2 for new lines connecting to Suncrest Substation off of Japatul Road within the Forest<sup>31</sup>

**Birds & Power lines:**

- **Refining Estimates of Bird Collision and Electrocution Mortality at Power Lines in the United States** Scott R. Loss; Tom Will; Peter P. Mar<sup>32</sup>; Smithsonian Conservation Biology Institute –

<sup>28</sup> <http://www.caiso.com/Documents/DraftSecondDiscussionPaper-ImperialCountyDiscussionPaper100814.pdf>

<sup>29</sup> [http://www.caiso.com/Documents/PresentationImperialCountyTransmissionConsultationOct8\\_2014.pdf](http://www.caiso.com/Documents/PresentationImperialCountyTransmissionConsultationOct8_2014.pdf)

<sup>30</sup> [http://www.caiso.com/Documents/Presentation-PreliminaryReliabilityAssessmentResults-Sep24\\_2014.pdf](http://www.caiso.com/Documents/Presentation-PreliminaryReliabilityAssessmentResults-Sep24_2014.pdf)

<sup>31</sup> <http://www.energy.ca.gov/2014publications/CEC-700-2014-002/CEC-700-2014-002-AD.pdf>

Migratory Bird Center, National Zoological Park, Washington, District of Columbia, United States of America; Division of; Migratory Birds – Midwest Regional Office, United States Fish and Wildlife Service, Bloomington, Minnesota, United States of America

- **Abstract**

- Collisions and electrocutions at power lines are thought to kill large numbers of birds in the United States annually. However, existing estimates of mortality are either speculative (for electrocution) or based on extrapolation of results from one study to all U.S. power lines (for collision). Because national-scale estimates of mortality and comparisons among threats are likely to be used for prioritizing policy and management strategies and for identifying major research needs, these estimates should be based on systematic and transparent assessment of rigorously collected data. We conducted a quantitative review that incorporated data from 14 studies meeting our inclusion criteria to estimate that between 12 and 64 million birds are killed each year at U.S. power lines, with between 8 and 57 million birds killed by collision and between 0.9 and 11.6 million birds killed by electrocution. Sensitivity analyses indicate that the majority of uncertainty in our estimates arises from variation in mortality rates across studies; this variation is due in part to the small sample of rigorously conducted studies that can be used to estimate mortality. Little information is available to quantify species-specific vulnerability to mortality at power lines; the available literature over-represents particular bird groups and habitats, and most studies only sample and present data for one or a few species. Furthermore, additional research is needed to clarify whether, to what degree, and in what regions populations of different bird species are affected by power line-related mortality. ***Nonetheless, our data-driven analysis suggests that the amount of bird mortality at U.S. power lines is substantial and that conservation management and policy is necessary to reduce this mortality.*** (emphasis added)

**Lighting:**

- Concerns are repeated here for potential of FAA required lighting or colored ball placement on new taller poles and conductors.
- This would degrade dark skies and scenic vistas that would impact quality of life, property values and tourism draw that are based on a less industrial appearing rural experience.

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<sup>32</sup> <http://www.plosone.org/article/fetchObject.action?uri=info%3Adoi%2F10.1371%2Fjournal.pone.0101565&representation=PDF>

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**From:** CourtCoyle@aol.com  
**Sent:** Wednesday, October 29, 2014 12:29 PM  
**To:** Dave.Knopp@sdcounty.ca.gov; Justin.crumley@sdcounty.ca.gov  
**Cc:** Donna.Beddow@sdcounty.ca.gov; slharvey@fs.fed.us; CNFMSUP  
**Subject:** Re: Volcan Mountain Preserve/SDG&E Pole Replacement Project

Dear Mr. Knopp,

Thank you for your response and acknowledgement of protecting cultural resources as a strategic goal for the County.

It would appear the County is misinformed about the work on Volcan Mountain Preserve. We understand from SDG&E that it is being done pursuant to a maintenance exemption. It is not part of the DEIS/DEIR for the Master Special Use Permit and Pole Replacement Project which is still in draft form and no decision has been made on that project. It is understandable that there may have been confusion, as it could be argued that the Volcan work was piecemealed from the larger project. Please see: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/Draft-EIR-EIS.htm>

Further, it does not appear that all County protocols and state procedures have been followed at the Volcan site. This includes the qualifications of the CRM firm relied upon by SDG&E and that work was restarted in the area where ancestral human remains were found over the objections of the Native American Monitor and prior to the NAHC designating a MLD. We do, however, understand that work on that part of the project has now been halted by SDG&E yesterday late afternoon.

Also, it would appear that alternative alignments for the subject poles should be considered at this time. This could include realigning the poles along the road. If the County does not take the opportunity now to practice avoidance, and get infrastructure out of archaeological sites/ sacred lands now, it is unlikely to happen later after the poles have been fortified.

We are also interested to learn the status of the SDG&E easement at issue. We understand that all the easements on Forest Service lands have expired and wonder if that was also the case with the easement in Volcan Preserve. If so, the County could have additional leverage to put the subject poles in a less environmentally damaging location on County Preserve lands.

We hope that this additional information is useful to you and look forward to the courtesy of a reply.

Best regards,  
Courtney Coyle

Courtney Ann Coyle  
Attorney at Law  
Held-Palmer House  
1609 Soledad Avenue  
La Jolla, CA 92037-3817

ph: 858.454.8687  
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In a message dated 10/28/2014 2:16:38 P.M. Pacific Daylight Time, [Dave.Knopp@sdcounty.ca.gov](mailto:Dave.Knopp@sdcounty.ca.gov) writes:

Mrs. Coyle,

I am responding on behalf of Brian Albright because he is out of the office. Thank you for your email regarding the possible finding of Native America remains during SDG&E's work on their easement on Volcan Mountain. One of the County of San Diego Department of Parks and Recreation's strategic goals is the protection of cultural resources.

We understand your concerns and have reached out to SDG&E through the County's Department of Planning and Development Services to ensure that all protocols are being used in the locations that possible human remains have been found. In order to work in the Volcan Mountain Preserve easement SDG&E went through a permitting process that included an Environmental Impact Report/Environmental Impact Statement with the California Public Utilities Commission and the United States Forest Service.

Please contact Justin Crumley in the Office of County Counsel if you have any further questions. Justin's email address is [Justin.crumley@sdcounty.ca.gov](mailto:Justin.crumley@sdcounty.ca.gov).

Sincerely,

**Dave Knopp**

Chief of Operations

County of San Diego Dept. of Parks and Rec.

5500 Overland Avenue, Suite 410

San Diego, CA 92123

(858) 966.1371

[Dave.knopp@sdcounty.ca.gov](mailto:Dave.knopp@sdcounty.ca.gov)





**CALIFORNIA PUBLIC UTILITIES COMMISSION /  
UNITED STATES FOREST SERVICE**



**San Diego Gas and Electric (SDG&E) Company  
Master Special Use Permit and Permit to Construct  
Power Line Replacement Projects**

**Draft Environmental Impact Report/Environmental Impact Statement**

**Written Comment Form\*  
(please print)\*\***

Comments that will be most useful during this review should focus on the adequacy of the analysis or the merits of the proposed action or alternatives considered. Comments should be as specific as possible.

Name\*: Travis Lyon  
 Affiliation (if any)\*: Alpine Community Planning Group - Chairman  
 Address\*: PO Box 1419  
 City, State, Zip Code\*: Alpine, CA 91901  
 Telephone Number\*: 619-952-8607  
 Email\*: travislyonacpg@gmail.com - acpgmembers@googlegroups.com

SEE ATTACHED COMMENT LETTER

\*Please either deposit this sheet at the sign-in table before you leave today or mail to the address on the reserve side. Attach additional sheets if needed. Comments can also be emailed to [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com). Please have the subject line of emails read "SDG&E Master Permit – DEIR/DEIS Comments" using common formats such as .doc, .docx, .pdf, .rtf, or .txt.

\*\* Please print. Your name, address, and comments become public information – see reverse for additional information.

# Alpine Community Planning Group

PO Box 1419, Alpine, CA 91901  
acpgmembers@googlegroups.com

November 04, 2014

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest  
c/o Dudek  
cnfmsup@dudek.com  
Sent via electronic mail

To Whom It May Concern:

The Alpine Community Planning Group (ACPG) has had the opportunity to review the Joint Draft Environmental Impact Report and Draft Environmental Impact Statement (DEIR/DEIS) for consideration of the San Diego Gas & Electric (SDG&E) proposed issuance of a Master Special Use Permit (MSUP) to Construct Power Line Replacement Projects in the Cleveland National Forest. Public testimony was heard at ACPG meetings held September 25<sup>th</sup> and October 23<sup>rd</sup>, 2014. A representative from the ACPG also attended the CPUC & Forest Service public meeting held on October 1, 2014 in Alpine. The ACPG unanimously voted to submit the following comments.

The ACPG has concerns over the following issues:

- **Pole Height/Span and the Effect on Fire Containment** – The project calls for installation of 442 weathered steel poles approximately 110ft in height. Due to the pole height the DEIR addresses a “no-fly” zone that limits the effectiveness of aerial fire containment. Unfortunately, no alternative effective method for fire containment is offered in the DEIR. Additionally, the DEIR indicates a 400ft span between towers that could allow sway and arcing between conductors. These design issues raise concerns over the potential to start fires and the effects on fire containment.
- **Water** – The amount of water to be used for dust containment during construction is projected to be 5-10 million gallons. The report states that the water is to be purchased from local sources, but does not indicate if it will be from local wells. The ACPG opposes the use of local wells.
- **Electricity Load & Potential for Future Increase** – The size of the conductors and the size of the wires/insulators to be used in the project have been raised as serious concerns. The project background states that the primary goal of the project is fire hardening and some relocation and undergrounding of the current transmission line. However, concern has been expressed that SDG&E intent is to increase the electric load along this transmission line at a later date, and is using this project to prepare for a future increased load without the full public review that would normally accompany such an increase.

The community of Alpine does not have a high level of trust in SDG&E and the CPUC public review process. This lack of trust is as a result of the Sunrise Powerlink project and the undergrounding of power lines throughout our village core that caused a major disruption to our community and businesses. The ACPG is supportive of the primary goals of this project - the fire hardening of the poles and the clearance of fuel along the transmission lines. However, we do not believe the concerns listed above have been appropriately addressed in the DEIR/DEIS and recommend the CPUC and Forest Service request that SDG&E address these concerns prior to proceeding with this project.

Thank you for your consideration.



Travis Lyon | Chairman

# BACKCOUNTRY AGAINST DUMPS

P.O. Box 1275, BOULEVARD, CA 9105

**DATE:** November 4, 2014

**TO:** CPUC & USFS VIA: [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com) & BIA via [john.rydzik@bia.gov](mailto:john.rydzik@bia.gov)

**FROM:** Donna Tisdale, President; 619-766-4170; [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com)

## **RE: SDG&E Master Special Use Permit – DEIR/DEIS Comments**

These comments are being submitted on behalf of our public benefit non-profit, Backcountry Against Dumps (BAD) and me as an individual. We incorporate by reference the comments that have been submitted currently and previously throughout this MSUP project review by the Boulevard Planning Group, the Protect Our Communities Foundation, Backcountry Against Dumps, Law Offices of Stephan C Volker, and Donna Tisdale.

### **We specifically repeat two of the Boulevard Planning Group's most important requests:**

- Require SDG&E to underground TL6931 between the Boulevard Substation and Crestwood Substation and between Crestwood Substation and Cameron Substation to reduce fire hazards and fire fighting impediments, to reduce visual clutter and impacts to birds and bats, to improve scenic view sheds along Tierra Del Sol, Historic Route 80 and I-8 and along Buckman Springs Road.
- Require SDG&E to use of imported / recycled water in place of using finite drought-stressed backcountry groundwater resources that are not being recharged due to extended drought conditions and climate change impacts.

### **SDG&E's MSUP Project has changed dramatically with belated inclusion of TL6931 which should require the re-opening of another round of public review, participation, and protest opportunity:**

- BAD is based in Boulevard which is now impacted by the belated addition of TL6931 and selection as part of the Environmentally Superior Alternative.
- BAD was an intervening party in the CPUC's proceedings for SDG&E's now withdrawn PTC A.12-12-007 for joint fire hardening of TL6931 and the Shu'luuk Wind gen-tie upgrade of TL6931 to 138kV between SDG&E's Crestwood and Boulevard Substations.
- BAD should automatically be allowed intervening party status to the newly revised MSUP project and belated addition of TL6931, with an opportunity to file a formal protest.

### **Disproportionate and cumulative impacts to predominantly low-income communities of Boulevard, Campo, La Posta:**

- Numerous large-scale wind, solar, utility infrastructure and development projects exist, are under construction, and are proposed in fairly concentrated areas between Boulevard and the entrance to Hauser Canyon in Campo.

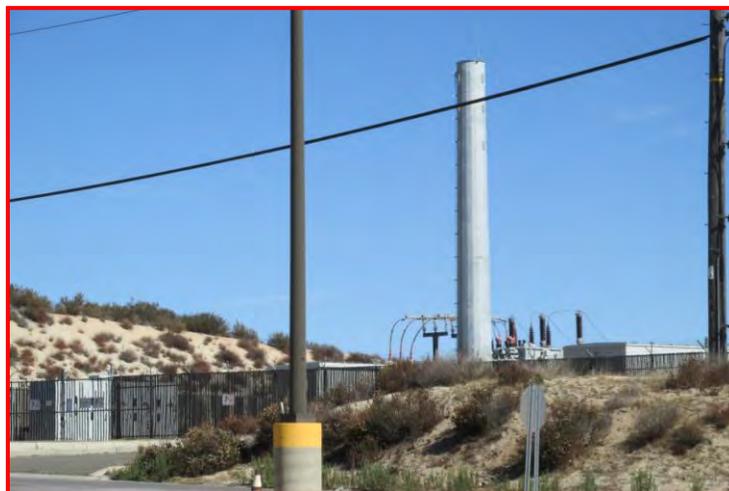
- These projects are not compatible with community character, public health and safety, protection of wildlife, riparian areas and open spaces.
- The increased number and size of projects increases potential wildfire ignition sources and access to previously less accessible areas and increased wildfire risk.
- Environmental Justice issues are involved and must be addressed.

**Correction to comments filed by Boulevard Planning Group on 10-17 related to Cameron Solar:**

- The Cameron Solar project proposed for the Campo Valley by Axio Power Holdings LLC is proposed for 19-30 acres of a 165 acre site—not 190 acres as stated in error/typo. Cameron Solar will connect to the grid via TL6923 that is proposed for double circuit upgrade in this MSUP and to the Cameron Substation that is also included for an upgrade in the proposed project.

**Installation of portion of new pole at SDG&E’s Crestwood Substation where MSUP work is proposed:**

- The photograph below (Tisdale) shows the new pole that was recently installed at the Crestwood Substation located on Historic Route 80 (Old 80) adjacent to the Golden Acorn Casino located on Campo tribal lands. It appears to be advance work related to this project prior to approval. What other purpose would it serve?



**We support previous request for like-for-like pole size replacement clarification submitted by The Protect Our Communities Foundation:**

- “Clarification to like-for-like pole size replacement alternative: POC would also like to clarify the description of the like-for-like pole size replacement alternative that POC requested in its November 7, 2013 comment letter on the EIR/EIS scoping memo. The clarification is that the like-for-like poles carry conductors of the same or similar capacity to the conductors that are on the existing wood poles. For example, the minimum conductor size recommended for a 69 kV line is a 3/0 ACSR conductor.<sup>4</sup> Yet SDG&E is proposing to use much higher capacity 636 kcmil ACSS conductors on the 69 kV lines. The like-for-like pole size replacement alternative should assume use of a 3/0 ACSR conductor or equivalent.”

**SDG&E's MSUP/PTC application is the first Incremental step to defacto/future expansion and carrying capacity beyond current capacity:**

- At page 30 of SDG&E's revised POD (April 2013)<sup>1</sup> they state the following (emphasis added):  
"Although the proposed conductors are physically capable of transmitting voltages higher than 69 kV, as discussed previously, the Proposed Action does not include or authorize any increase in voltage rating. Any such increases to system capacity would require changes to any associated substations and other infrastructure. Further, any proposed increases to system capacity would Cleveland National Forest Master Special Use Permit 31 require additional CAISO and CPUC evaluation and approval beyond what has been requested in SDG&E's Permit to Construct application."
- Future expansion would only require authorized increased voltage ratings and equipment upgrades at existing substations and additions to the currently proposed taller and expanded poles and lines; future expansions will likely breeze through any approval process due to "existing" infrastructure, footprint, and already degraded visual resources.

**Errors and omissions in the MSUP DEIR/EIS include but are not limited to the following:**

- **TTL6931, located in Boulevard is not even mentioned in Commissioner Peevey's scoping memo** and ruling dated 3-17-14.
- **The map for the new TL6931 route through Boulevard is *buried* at page 199 of 206 pages** of the DEIR/EIS Executive Summary<sup>2</sup>
- **The cost of upgrading TL6931 does not appear to be included** in SDG&E's estimated \$418.5 million or potential for +/-5% error
- 
- **D.8.1.2 Project-Specific Fire Environment – Proposed Power Line Replacement Projects- does not include TL6931**
- **D.8-12: Boulevard is not included in the MSUP as one of the Communities At Risk despite Boulevard's inclusion as a Community At Risk <sup>3</sup> on Cal Fire's website** (updated on October 17<sup>th</sup>)
- **SDG&E's Revised POD Attachment G-9: Construction Equipment Summary<sup>4</sup>** does not appear to include TL6931 details; appears to underestimate or misrepresent the number and extent of water trucks, cement trucks, and helicopters needed from construction of the project, based on firsthand experience with previous and current backcountry construction of SDG&E's Sunrise Powerlink, ECO Substation, Boulevard Substation, and related new 138kV lines in the same impacted areas.
- **There is limited information on the potential for adverse impacts to public/private /commercial electronics and appliances during any disruption of service** when transferring to the new lines from old lines and interconnections related potential loss of power, low voltage, power surges or brownouts similar to those experienced by Boulevard area residents during SDG&E's reconductoring and upgrade work on TL6931 and the Boulevard Substation related to

<sup>1</sup> [https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%2004-19-13\\_0.pdf](https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%2004-19-13_0.pdf)

<sup>2</sup> [http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC\\_PLRP\\_EIR-EIS\\_PART1\\_Begin\\_C.pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC_PLRP_EIR-EIS_PART1_Begin_C.pdf)

<sup>3</sup>

<sup>4</sup> [https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20G%20Construction%20Equipment%20Summary%20\(04-19-13S\).pdf](https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20G%20Construction%20Equipment%20Summary%20(04-19-13S).pdf)

connecting the Kumeyaay Wind facility to the grid in late 2005 or early 2006. Boulevard was taken off-grid and placed on 2 emergency generators that produced fluctuating energy and brown outs, damaging personal equipment. There was no independent monitoring –when there should have been. Complaints were reportedly filed with unknown outcomes other than stated frustrations with SDG&E.

- **Appendix B<sup>5</sup>**: Parcel and mailing information for properties within 300 feet of the proposed project does not include any Boulevard properties that are now impacted by the belated inclusion of TL6931 in so-called Environmentally Superior Route. Where is the list of Boulevard property owners and proof of notification?
- **Project Description B figures B8 through B 13** fail to disclose the potential height of new poles<sup>6</sup> which would make it much easier for the general public to visualize the significant changes.
- **Revised POD attachment: Typical Drawings** does not include the height of poles or width for underground vaults—the drawings vaguely state that “height will vary” without providing actual minimum/maximum height:  
[https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20E%20Typical%20Drawings%20\(04-19-13S\).pdf](https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20E%20Typical%20Drawings%20(04-19-13S).pdf)
- **SDG&E’s fire hardening and other direct and indirect projects include a new and/or expanded network of wireless equipment and facilities**, including communication facilities adjacent to Cal Fire’s White Star Station located on Tierra Del Sol Road in Boulevard; the individual and cumulative impacts on public health and safety and impacts to resident and migratory wildlife are not adequately disclosed, addressed, analyzed or mitigated.
- **4.1.2 Installation of Other Facilities @ page 31 of SDG&E Revised POD dated April 2013, includes the following statement (emphasis added)** *For example, installation of appurtenant facilities—such as weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities—on the replacement steel poles within existing ROWs may be necessary or prudent to collect additional information needed to further increase fire safety and service reliability as new technologies become available.*
- **Revised POD attachment F: Electric and Magnetic Fields<sup>7</sup>**, fails to include the most recent research and conclusions related to public health and safety from chronic exposure to electric magnetic fields and wireless communications facilities:
- **Attachment F: Electric Magnetic Fields is outdated and bordering on negligent:**
  - It fails to address more recent research and findings (listed below)
  - The most current reference included in Attachment F, “*California Public Utilities Commission, Opinion on Commission Policies Addressing Electromagnetic Fields Emanating From Regulated Utility Facilities, 2006* is biased towards utilities self-serving and unsupported claims of “uncertainty”. That 2006 document was generated by the CPUC during President Peevey’s reign that has now come under a cloud of scandal with growing allegations of wrongdoing and appeals to Attorney General Kamala Harris for

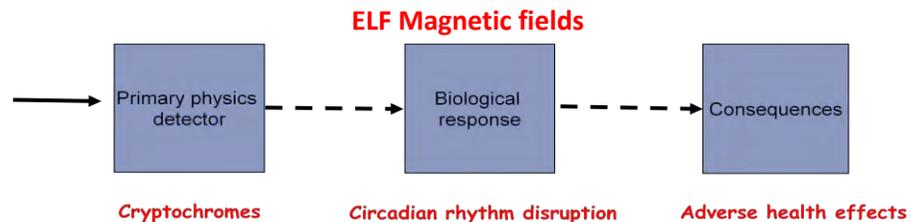
<sup>5</sup> [http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF\\_Amended%20Application.pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Amended%20Application.pdf)

<sup>6</sup> [http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC\\_PLRP\\_EIR-EIS\\_PART1\\_Begin\\_C.pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC_PLRP_EIR-EIS_PART1_Begin_C.pdf)

<sup>7</sup> [https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20F%20Electric%20and%20Magnetic%20Fields%20\(04-19-13S\).pdf](https://www.sdge.com/sites/default/files/regulatory/CNF%20Revised%20POD%20Attachment%20F%20Electric%20and%20Magnetic%20Fields%20(04-19-13S).pdf)

criminal investigations into Commissioner Peevey and his too cozy relationships with and biased behavior favoring regulated utilities.

- **More recent research on public health and safety impacts related to EMF and various wireless radiation exposures include the following pertinent information that was not addressed:**
  - Work /research conducted by epidemiologist Dr. Sam Milham, including documents posted on his website<sup>8</sup> that are incorporated by reference here.
  - The Austria Medical Associations EMF Working Group’s paper and guidelines for the diagnosis and treatment of EMF-related health problems and illnesses<sup>9</sup>
  - The 2012 Bioinitiative Report with a rationale for biologically based public exposure standards for EMF (ELF and RF) and 2014 documents posted at [www.bioinitiative.org](http://www.bioinitiative.org) , all of which are incorporated by reference.
  - Bioinitiative Working Group’s “What’s New Link” (April 4, 2014)with updated research<sup>10</sup>
  - Bioinitiative Working Group Comments on 2014 SCENIHR Preliminary Opinion on Potential Health Effects of EMF<sup>11</sup>, dated April 12, 2014; excerpt (emphasis added)“*All of these comments and criticisms argue most strongly for a conclusion in the SCENIHR Final Opinion on EMF that health effects are possible, and in some cases such effects are established.*”
  - **The attached May 2010 letter from the University of Bristol Physics Professor, Denis Henshaw on the Adverse health effects of exposure to power frequency electric and magnetic fields (EMFs)**, addresses Epidemiological evidence; Magnetic fields and living systems; The independent 2007 Bioinitiative Report.
  - EMF impact flow chart (below) came from June 2011 power point presentation by EMF expert Dennis Henshaw, PhD: School of Physics University of Bristol, UK and should be addressed<sup>12</sup> , it applies to all people, pets, livestock, and wildlife :



- **The attached US Dept of Interior’s letter to the National Telecommunications and Information Administration in response to ER 14/0001) (ER 14/0004, dated February 7, 2014 includes the following comments on the need to comply with Executive Order 13186 to conserve migratory bird resources including eagles (excerpt-emphasis added):** “ *The Department believes that some of the proposed procedures are not consistent with Executive Order 13186 Responsibilities of Federal Agencies to Protect Migratory Birds, which specifically requires federal agencies to develop and use principles, standards, and practices that will lessen the amount of unintentional take reasonably attributed to agency actions. The Department, through the Fish and Wildlife Service (FWS), finds that the proposals lack provisions necessary to conserve migratory*

<sup>8</sup> <http://www.sammilham.com/>

<sup>9</sup> [http://www.avaate.org/IMG/pdf/MEDICOS\\_AUSTRIA\\_RECOMENDACIONES\\_EMF-Guideline.pdf](http://www.avaate.org/IMG/pdf/MEDICOS_AUSTRIA_RECOMENDACIONES_EMF-Guideline.pdf)

<sup>10</sup> <http://www.bioinitiative.org/bioinitiative-working-group-announces-whats-new-link/>

<sup>11</sup> <http://www.bioinitiative.org/potential-health-effects-emf/>

<sup>12</sup> [http://www.electric-fields.bris.ac.uk/henshaw\\_arr\\_june\\_2011.ppt](http://www.electric-fields.bris.ac.uk/henshaw_arr_june_2011.ppt)

*bird resources, including eagles. The proposals also do not reflect current information regarding the effects of communication towers to birds. Our comments are intended to further clarify specific issues and address provisions in the proposals. The Department recommends revisions to the proposed procedures to better reflect the impacts to resources under our jurisdiction from communication towers. The placement and operation of communication towers, including un-guyed, unlit, monopole or lattice-designed structures, impact protected migratory birds in two significant ways. The first is by injury, crippling loss, and death from collisions with towers and their supporting guy-wire infrastructure, where present. The second significant issue associated with communication towers involves impacts from non-ionizing electromagnetic radiation emitted by them...”*

**Table D.7-2 Mitigation, Monitoring, Compliance, and Reporting – Public Health and Safety<sup>13</sup>:**

- **At page D.7-34: MM PHS-5 and PHS-6 are adequate.** It does not address concerns raised and requests made to identify the fly routes for this project based on previous negative experiences with SDG&E’s construction of the Sunrise Powerlink and belated addition of controversial fly yards throughout the same impacted rural communities and neighborhoods. Some incredibly heavy Sunrise Powerlink components were reportedly flown directly over homes and public access areas in the McCain Valley area of Boulevard and elsewhere.

**ECO Substation connection via TL6931, the new Boulevard Substation and new 138kV lines linking them together:**

- The photo below (Tisdale) shows current work on SDG&E’s new ECO Substation’s 138kV line
- The size of the trucks compared to the new poles help put things in perspective related to bulk and scale.



**Once again, these comments are incomplete and not as well organized or edited as preferred, due to a lack of time and other obligations.**

**###**

<sup>13</sup> [http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC\\_PLRP\\_EIR-EIS\\_PART3\\_D.5\\_L.pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP-PTC_PLRP_EIR-EIS_PART3_D.5_L.pdf)



## United States Department of the Interior

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

**FEB - 7 2014**



In Reply Refer To: (ER 14/0001) (ER 14/0004 ).

Mr. Eli Veenendaal  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, D.C. 20230

Dear Mr. Veenendaal:

The Department of the Interior (Department) has reviewed the above referenced proposal and submits the following comments and attachment for consideration. Because the First Responder Network Authority (FirstNet) is a newly created entity, we commend the U.S. Department of Commerce for its timely proposals for NEPA implementing procedures.

The Department believes that some of the proposed procedures are not consistent with Executive Order 13186 Responsibilities of Federal Agencies to Protect Migratory Birds, which specifically requires federal agencies to develop and use principles, standards, and practices that will lessen the amount of unintentional take reasonably attributed to agency actions. The Department, through the Fish and Wildlife Service (FWS), finds that the proposals lack provisions necessary to conserve migratory bird resources, including eagles. The proposals also do not reflect current information regarding the effects of communication towers to birds. Our comments are intended to further clarify specific issues and address provisions in the proposals.

The Department recommends revisions to the proposed procedures to better reflect the impacts to resources under our jurisdiction from communication towers. The placement and operation of communication towers, including un-guyed, unlit, monopole or lattice-designed structures, impact protected migratory birds in two significant ways. The first is by injury, crippling loss, and death from collisions with towers and their supporting guy-wire infrastructure, where present. The second significant issue associated with communication towers involves impacts from non-ionizing electromagnetic radiation emitted by them (See Attachment).

In addition to the 14 7 Birds of Conservation Concern (BCC) species, the FWS has listed an additional 92 species as endangered or threatened under the Endangered Species Act. Together

with the bald and golden eagle, this represents 241 species of birds whose populations are in trouble or otherwise merit special protection, according to the varying criteria of these lists. The Department suggests that FirstNet consider preparing a programmatic environmental impact statement (see attachment) to determine and address cumulative impacts from authorizing FirstNet projects on those 241 species for which the incremental impact of tower mortality, when added to other past, present, and reasonably foreseeable future actions, is most likely significant, given their overall imperiled status. Notwithstanding the proposed implementing procedures, a programmatic NEP A document might be the most effective and efficient method for establishing best management practices for individual projects, reducing the burden to individual applicants, and addressing cumulative impacts.

#### *Categorical Exclusions*

The Department has identified 13 of the proposed categorical exclusions (A-6, A-7, A-8, A-9, A-10, A-11, A-12, A-13, A-14 A-15, A-16, A-17, and A-19) as having the potential to significantly affect wildlife and the biological environment. Given this potential, we want to underscore the importance of our comments on FirstNet's procedural guidance under Environmental Review and Consultation Requirements for NEP A Reviews and its list of extraordinary circumstances in Appendix D.

#### *Environmental Review and Consultation Requirements for NEP A Reviews*

To ensure there are no potentially significant impacts on birds from projects that may otherwise be categorically excluded, the Department recommends including the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act to the list of requirements in this section.

#### *Extraordinary Circumstances*

To avoid potentially significant impacts on birds from projects that may otherwise be categorically excluded, the Department recommends including species covered under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act to the list of environmentally sensitive resources. Additionally, adding important resources to migratory birds such as sites in the Western Hemisphere Shorebird Reserve Network and Audubon Important Bird Areas to the paragraph on areas having special designation or recognition would help ensure their consideration when contemplating use of a categorical exclusion.

#### *Developing the Purpose and Need*

The Department recommends inclusion of language that would ensure consideration of all other authorities to which NEPA is supplemental as opposed to simply the FirstNet mission. As currently written, the procedures are limited to ensuring the purpose and need considers the FirstNet mission. If strictly applied, this approach would severely limit the range of reasonable alternatives, and likely preclude consideration of more environmentally benign locations or construction practices.

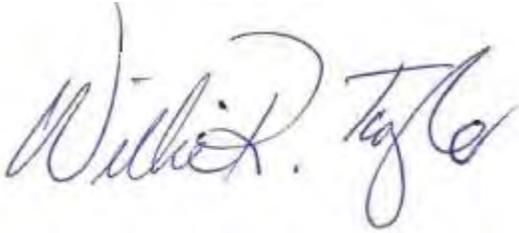
#### *Environmental Review Process, Apply NEP A Early in the Process, Where Action is by Non-Federal Entity*

The Department recommends that FirstNet be required to coordinate with federal agencies having jurisdiction by law or special expertise on construction and lighting of its network of

towers.

Thank you for the opportunity to comment on the draft document. If you have any questions concerning the comments, please contact Diana Whittington, NEP A Migratory Bird lead, at (703) 358-2010. If you have any questions regarding Departmental NEPA procedures, contact Lisa Treichel, Office of Environmental Policy and Compliance at (202) 208-7116.

Sincerely,

A handwritten signature in blue ink that reads "Willie R. Taylor". The signature is written in a cursive style with a large initial "W".

Willie R. Taylor  
Director, Office of Environmental Policy and Compliance

Enclosure

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Longcore, T., C. Rich, P. Mineau, B. MacDonald, D.G. Bert, L.M. Sullivan, E. Mutrie, S.A. Gauthreaux, Jr., M.L. Avery, R.C. Crawford, A.M. Manville, II, E.R. Travis, and D. Drake. 2013. Avian mortality at communication towers in the United States and Canada: which species, how many, and where? *Biological Conservation* 158: 410-419.

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### **Enclosure A**

#### **Background**

The placement and operation of communication towers, including un-guyed, unlit, monopole or lattice-designed structures, impact protected migratory birds in two significant ways.

The first is by injury, crippling loss, and death from collisions with towers and their supporting guy-wire infrastructure, where present. Mass mortality events tend to occur during periods of peak spring and fall songbird migration when inclement weather events coincide with migration, and frequently where lights (either on the towers and/or on adjacent outbuildings) are also present. This situation has been well documented in the U.S. since 1948 in the published literature (Aronoff 1949, see Manville 2007a for a critique). The tallest communication towers

tend to be the most problematic (Gehring *et al.* 2011). However, mid-range (~400-ft) towers as proposed by the First Responder Network Authority (FirstNet, a newly created entity under the Department of Commerce) can also significantly impact protected migratory birds, as can unguied and unlit lattice and monopole towers (Gehring *et al.* 2009, Manville 2007a, 2009, 2013a).

Mass mortalities (more than several hundred birds per night) at unguied, unlit monopole and lattice towers were documented in fall 2005 and 2011 in the Northeast and North Central U.S. (*e.g.*, Manville 2007a). It has been argued that communication towers including “short” towers do not impact migratory birds, including at the population level (*e.g.*, Arnold and Zink 2011), but recent findings have contradicted that assertion (Manville 2007a, 2013a, Longcore *et al.* 2012, 2013).

The second significant issue associated with communication towers involves impacts from nonionizing electromagnetic radiation emitted by these structures. Radiation studies at cellular communication towers were begun circa 2000 in Europe and continue today on wild nesting birds. Study results have documented nest and site abandonment, plumage deterioration, locomotion problems, reduced survivorship, and death (*e.g.*, Balmori 2005, Balmori and Hallberg 2007, and Everaert and Bauwens 2007). Nesting migratory birds and their offspring have apparently been affected by the radiation from cellular phone towers in the 900 and 1800 MHz frequency ranges- 915 MHz is the standard cellular phone frequency used in the United States. However, the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today. This is primarily due to the lower levels of radiation output from microwave-powered communication devices such as cellular telephones and other sources of point-to-point communications; levels typically lower than from microwave ovens. The problem, however, appears to focus on very low levels of non-ionizing electromagnetic radiation. For example, in laboratory studies, T. Litovitz (personal communication) and DiCarlo *et al.* (2002) raised concerns about impacts of low-level, non-thermal electromagnetic radiation from the standard 915 MHz cell phone frequency on domestic chicken embryos- with some lethal results (Manville 2009, 2013a). Radiation at extremely low levels (0.0001 the level emitted by the average digital cellular telephone) caused heart attacks and the deaths of some chicken embryos subjected to hypoxic conditions in the laboratory while controls subjected to hypoxia were unaffected (DiCarlo *et al.* 2002). To date, no independent, third-party field studies have been conducted in North America on impacts of tower electromagnetic radiation on migratory birds. With the European field and U.S. laboratory evidence already available, independent, third-party peer-reviewed studies need to be conducted in the U.S. to begin examining the effects from radiation on migratory birds and other trust species.

## **Discussion**

### ***Collision Deaths and Categorical Exclusions***

Attempts to estimate bird-collision mortality at communication towers in the U.S. resulted in figures of 4-5 million bird deaths per year (Manville 2005, 2009). A meta-review of the published literature now suggests, based on statistically determined parameters, that mortality may be 6.8 million birds per year in Canada and the U.S.; the vast majority in the United States (Longcore *et al.* 2012). Up to 350 species of birds have been killed at communication towers

(Manville 2007a, 2009). The Service's Division of Migratory Bird Management has updated its voluntary, 2000 communication tower guidelines to reflect some of the more recent research findings (Manville 2013b). However, the level of estimated mortality alone suggests at a minimum that FirstNet prepare an environmental assessment to estimate and assess the cumulative effects of tower mortality to protected migratory birds.

A second meta-review of the published mortality data from scientific studies conducted in the U.S. and Canada (Longcore *et al.* 2013) strongly correlates population effects to at least 13 species of Birds of Conservation Concern (BCC, USFWS 2008). These are mortalities to BCC species based solely on documented collisions with communication towers in the U.S. and Canada, ranging from estimated annual levels of mortality of 1 to 9% of their estimated total population. Among these where mortality at communication towers was estimated at over 2% annually are the Yellow Rail, Swainson's Warbler, Pied-billed Grebe, Bay-breasted Warbler, Golden-winged Warbler, Prairie Warbler, and Ovenbird. Longcore *et al.* (2013) emphasized that avian mortality associated with anthropogenic sources is almost always reported in the aggregate, *i.e.*, "number of birds killed," which cannot detect species-level effects necessary to make effective and meaningful conservation assessments, including determining cumulative effects. These new findings strongly suggest the need for at least an environmental assessment by FirstNet, or more likely, an environmental impact statement.

### ***Radiation Impacts and Categorical Exclusions***

There is a growing level of anecdotal evidence linking effects of non-thermal, non-ionizing electromagnetic radiation from communication towers on nesting and roosting wild birds and other wildlife in the U.S. Independent, third-party studies have yet to be conducted in the U.S. or Canada, although a peer-reviewed research protocol developed for the U.S. Forest Service by the Service's Division of Migratory Bird Management is available to study both collision and radiation impacts (Manville 2002).

As previously mentioned, Balmori (2005) found strong negative correlations between levels of tower-emitted microwave radiation and bird breeding, nesting, and roosting in the vicinity of electromagnetic fields in Spain. He documented nest and site abandonment, plumage deterioration, locomotion problems, reduced survivorship, and death in House Sparrows, White Storks, Rock Doves, Magpies, Collared Doves, and other species. Though these species had historically been documented to roost and nest in these areas, Balmori (2005) did not observe these symptoms prior to construction and operation of the cellular phone towers. Balmori and Hallberg (2007) and Everaert and Bauwens (2007) found similar strong negative correlations among male House Sparrows. Under laboratory conditions, DiCarlo *et al.* (2002) raised troubling concerns about impacts of low-level, non-thermal electromagnetic radiation from the standard 915 MHz cell phone frequency on domestic chicken embryos- with some lethal results (Manville 2009). Given the findings of the studies mentioned above, field studies should be conducted in North America to validate potential impacts of communication tower radiation both direct and indirect – to migratory birds and other trust wildlife species.

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TO WHOM IT MAY CONCERN

May 2010

Dear Sir

**Adverse health effects of exposure to power frequency electric and magnetic fields (EMFs)**

I am writing in response to enquiries I have received on the above issue.

It is indeed unfortunate that the question of health effects of exposure to EMFs well below current exposure guidelines has not received the highest level of scientific or public health attention that it deserves. The evidence of adverse health effects from EMFs associated with the electricity supply, in particular magnetic field (MF) exposures around or below 1 microtesla ( $\mu\text{T}$ ), is huge and it is quite clear across a range of outcomes. We have long passed the stage where application of the Precautionary Principle and of appropriate legislation against undue exposure is warranted, including a substantial lowering of permitted MF exposure limits, currently 100  $\mu\text{T}$ . In the case of high voltage overhead powerlines, these should not be built close to houses or farms where cattle and poultry are housed.

The available evidence on adverse health effects of MF exposure speaks for itself. No longer can we talk of differing opinions of whether or not there are such adverse health effects: the question is not about what people think, rather it is about what the evidence says.

Official review bodies are usually constrained by their Terms of Reference and have not been in a position to access the bulk of our scientific knowledge of MF interactions with biological systems. As I will explain below, I estimate that such bodies have at most addressed only 10% of the available evidence/data.

I will deal in turn with some aspects of the available scientific evidence/data.

1. Epidemiological evidence

The epidemiological evidence of adverse health effects from EMFs from human population studies has emerged continuously in recent years and it continues to do so. Particular emphasis has been placed on MF exposures, although electric field, EF effects continue to be researched. It may be useful to consider what recent official reports have said concerning MF health effect in particular – see summary table attached.

Internationally, the first major report of note was the US NIEHS report of 1999 (see list of acronyms below). This concluded that both adult and childhood leukaemia was associated with EMF

exposure. However, the 2002 IARC report (part of WHO) without apparent reference to the NIEHS conclusions, concluded that childhood leukaemia was the only cancer associated with EMF (note that IARC is only concerned with non-cancer health outcomes). However, the California Department of Health Sciences report, also published in 2002 concluded that increased risk of five health outcomes was associated with MF exposures: (i) childhood leukaemia; (ii) adult leukaemia; (iii) adult brain cancer; (iv) amyotrophic lateral sclerosis, ALS (or motor neurone disease) and (v) miscarriage. More recently the EU SCENIHR report has associated childhood leukaemia and Alzheimer's disease to MF exposures. The 2007 WHO EHC Report appears to prevaricate on a range of health outcomes, admitting to the existence of evidence but saying simply that this is 'not as strong' as for childhood leukaemia. It is noteworthy that the various reported adverse health effects are associated with average MF exposures around or below 1  $\mu$ T. In the specific case of childhood leukaemia, a doubling of risk is seen with average exposures above 0.4  $\mu$ T.

The 2002 IARC and California Reports are now a little historic, but their findings have set the trend of perceived MF health effects in recent years. Given that these two reports were published at about the same time, a number of commentators have asked why two major reports using presumably the same available data came to quite different conclusions with respect to the many studies of adult leukaemia and adult brain cancer. This led my colleague Professor Mike O'Carroll and me to study what was said in both reports and to publish our findings in a learned peer-reviewed journal (O'Carroll & Henshaw 2007). We focused on adult leukaemia and adult brain cancer. We found that whereas the California report had looked at each individual study and at the overall findings of the studies in aggregate, the IARC report had made no attempt to look at the aggregate data. This was strange because IARC had listed in tables the findings from 33 studies of adult leukaemia and 43 studies of adult brain cancer. It was quite clear from inspection of these tables that there was a clear dominance of studies reporting a positive association with MF exposure. In the case of adult leukaemia, the association was, if anything, stronger than that for childhood leukaemia. In O'Carroll & Henshaw we concluded: "*IARC shows no evidence of considering the aggregation of results other than subjectively. It considered individual studies but this led to a tendency to fragment and dismiss evidence that is intrinsically highly significant*".

Naturally, I am critical of the 2002 IARC report for not carrying out a rather basic analysis of the overall data. However, this tendency has been repeated in later WHO Reports and by the UK NRPB (now subsumed into the HPA). In fact, these later reports fail to cite or in anyway discuss the conclusions of the California Report. I have to say that this is simply bad science and indeed it is unprofessional. Were any of these reports submitted for publication to a good scientific journal, failure to pick up these failures of citation and basic analysis would be picked up by the blind peer-review system and the reports would not be published. Instead, sadly, they enjoy a rather false sense of respectability. I am bound to say that Governments and Power Companies are being poorly advised if they seek to rely solely on advice from these sources.

Notwithstanding this situation, as mentioned above, the February 2009 update of the EU SCENIHR report has added Alzheimer's disease as associated with MF exposures, based on recent studies that were not available to the earlier review bodies. Alzheimer's disease is highly prevalent in the aging population and of considerable public health significance. Of special note is the 1.5 to 2-fold increase in risk specifically seen near powerlines in Switzerland (Huss *et al.* 2008).

## 2. Magnetic fields and living systems

I now expand on my above comment that official review bodies have accessed at most only 10% of the relevant scientific data. The areas where MF interactions with living systems have been extensively discussed are:

1. The known ability of birds and other animals to detect tiny changes in the Earth's magnetic field (the Geomagnetic or GM) for the purposes of navigation.

2. The ability of plants to sense magnetic fields including power frequency AC fields.
3. Health effects arising from fluctuations in GM fields
4. The use of magnetic fields, including levels below the ICNIRP limit for medical treatment in wound & bone healing.

I will refer below to the 2008 Bioinitiative Report, but here is an extract of what it says about the use of MFs for medical treatment:

**"Another Way of Looking at EMFs: Therapeutic Uses**

Many people are surprised to learn that certain kinds of EMFs treatments actually can heal. These are medical treatments that use EMFs in specific ways to help in healing bone fractures, to heal wounds to the skin and underlying tissues, to reduce pain and swelling, and for other postsurgical needs. Some forms of EMFs exposure are used to treat depression. EMFs have been shown to be effective in treating conditions of disease at exposure levels far below current public exposure standards. This leads to the obvious question. How can scientists dispute the harmful effects of EMF exposures while at the same time using forms of EMF treatment that are proven to heal the body?

**Medical conditions are successfully treated using EMFs at levels below current public safety standards, proving another way that the body recognizes and responds to low-intensity EMF signals. Otherwise, these medical treatments could not work. The FDA has approved EMFs medical treatment devices, so is clearly aware of this paradox.**

Random exposures to EMFs, as opposed to EMFs exposures done with clinical oversight, could lead to harm just like the unsupervised use of pharmaceutical drugs. This evidence forms a strong warning that indiscriminate EMF exposure is probably a bad idea.

**No one would recommend that drugs used in medical treatments and prevention of disease be randomly given to the public, especially to children. Yet, random and involuntary exposures to EMFs occur all the time in daily life.**

I would add that medical treatment is normally given for a fixed period and not continuously and chronically as for an MF exposure near powerlines.

It is in the field of animal navigation that most progress is currently being made in elucidating the *primary* mechanism by which MFs are known to interact with biological systems. The scientific literature in this field is vast but reference to five recent publications is given below (Ritz *et al.* 2000, 2004 & 2009; Begall *et al.* 2008, Burda *et al.* 2009). Current research suggests that birds possess a magnetic compass in the eye which functions by means of a process which is deeply rooted in chemistry known as the Radical Pair Mechanism. This is the mechanism by which low intensity MFs can increase the lifetime of free radicals. In birds, magneto-reception appears to occur in biological molecules known as cryptochromes, the same molecules that have been associated with magneto-reception in plants. Crucially, cryptochromes are present in human tissues generally, so here too they could be responsible for the primary detection of magnetic fields in man (though I stress such research has not yet been carried out). Whereas in birds the MF-induced increase in lifetime of free radicals is detected for the purposes of navigation, in general such an increase results in their greater ability to cause biological damage, especially in DNA.

The way in which MFs affect biological is becoming increasingly understood. A detailed description and excellent summary may be found in the BioInitiative Report. Here are some extracts from Section 1 (note that this report also discusses health effects from radio frequency RF exposures, principally from mobile phones. The term 'ELF' refers to power frequency EMFs):

Page 17: Both ELF and RF exposures can be considered genotoxic (will damage DNA) under certain conditions of exposure, including exposure levels that are lower than existing safety limits.

Very low-level ELF and RF exposures can cause cells to produce stress proteins, meaning that the cell recognizes ELF and RF exposures as harmful. This is another important way in which scientists have documented that ELF and RF exposures can be harmful, and it happens at levels far below the existing public safety standards.

Page 18: There is substantial evidence that ELF and RF can cause inflammatory reactions, allergy reactions and change normal immune function at levels allowed by current public safety standards.

Page 19: Oxidative stress through the action of free radical damage to DNA is a plausible biological mechanism for cancer and diseases that involve damage from ELF to the central nervous system.

### 3. The 2007 BioInitiative Report

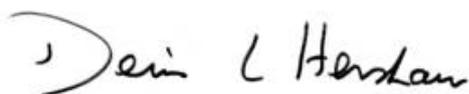
This is an independent report on EMF health effects, which covers both power frequency MFs and radio frequency EMFs such as from mobile phones. The authors include three former Presidents of the International Bioelectromagnetics Society and it presents an authoritative view of the state of the science and the need for precaution against exposure. The report may be accessed at: <http://www.bioinitiative.org/index.htm>

### 4. Summary

It is notable that some countries took action many years ago to limit public exposure to magnetic fields associated with high voltage powerlines, for example Sweden in 1996, Switzerland and Italy in 2000. Included in the substantial literature of EMF health effects is the 2007 study by Lowenthal *et al.* of increased risk of lymphoproliferative and myeloproliferative disorders in Tasmania.

It is indeed unfortunate that power companies and some governments continue to be ill advised on the adverse health effects of EMF exposures. In the case of overhead powerlines, we really are passed the stage where we should be erecting overhead powerlines close to house and centres of population.

Yours sincerely



Denis L Henshaw

**Review bodies' assessments of EMF causation of various diseases.  
- health outcomes classified as Class 2B - possible causal.**

| Disease                    | IARC <sup>1</sup><br>2002 | NIEHS 1999 <sup>2</sup> | California<br>2002 | EU: SCENIHR <sup>3</sup><br>February 2009 |
|----------------------------|---------------------------|-------------------------|--------------------|---|
| 1. Childhood Leukaemia     | Yes                       | Yes                     | Yes                | Yes                                       |
| 2. Adult Leukaemia         |                           | Yes                     | Yes                |   |
| 3. Adult brain cancer      |                           |                         | Yes                |   |
| 4. Miscariage              |                           |                         | Yes                |   |
| 5. ALS <sup>4</sup>        |                           |                         | Yes                |   |
| 6. Alzheimer's disease     |                           |                         |                    | Yes <sup>5</sup>                          |
| 7. Childhood brain tumours |                           |                         |                    | Emerging evidence                         |

<sup>1</sup>International Agency for Research on Cancer

<sup>2</sup>US National Institute of Environmental Sciences

<sup>3</sup>EU: Scientific Committee on Emerging and Newly Identified Health Risks:  
Possible effects of Electromagnetic Fields (EMF) on Human Health.

<sup>4</sup>Motor neurone disease

<sup>5</sup>Studies only recently published

**Table Note.** A doubling of childhood leukaemia risk is seen for average exposures above 0.4  $\mu$ T. Other health risks refer generally to increased risk around or below 1  $\mu$ T average exposure. The current ICNIRP exposure guidelines are set at 100  $\mu$ T, 250 times higher than 0.4  $\mu$ T where the doubling of childhood leukaemia risk is seen.

## Acronyms

HPA: Health Protection Agency (UK)

IARC: International Agency for Research on Cancer (a branch of WHO)

ICNIRP: International Commission on Non-ionising Radiation Protection

NIEHS: National Institute of Environmental Health Sciences (USA)

NRPB: National Radiological Protection Board (UK)

SCENIHR: Scientific Committee on Emerging and Newly Identified Health Risks (EU)

WHO: World Health Organisation

WHO EHC: World Health Organisation Environmental Health Criteria

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November 4, 2014

Via E-Mail:

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor  
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E-Mail: [cnfmsup@dudek.com](mailto:cnfmsup@dudek.com)

Re: SDG&E Master Permit–DEIR/DEIS Comments

Dear Lisa Orsaba and Will Metz:

The Cleveland National Forest Foundation is a nonprofit group dedicated to preserving the plants, animals and other natural resources of Southern California mountains by protecting the land and water they need to survive. The purpose of this letter is to inform the California Public Utilities Commission, United States Department of the Agriculture, Forest Service, Cleveland National Forest that its Draft EIR for the Master Special Use Permit and Permit to Construct Power Line Replacement Projects (“Project”) fails to comply with the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. (“Guidelines”). For the reasons set forth below, we request that the lead agencies delay further consideration of the Project until such time as a legally adequate EIR is prepared that fully complies with CEQA.

**I. Introduction**

CNFF fully supports renewable energy as a means to combat global warming. CNFF would like to see SDG&E meet—and exceed—the state’s Renewable Portfolio Standard (“RPS”), which establishes a 33% renewable energy target by 2020. Unfortunately, the Project completely fails to push the needle forward on either goal.

Instead, the Project supplements the transmission of the region’s existing energy supply with a “fourfold increase in the conductor’s ability to move energy” (DEIR at G-3) without proposing any commensurate reductions in non-renewable sources, i.e. “dirty energy.” As a result, the EIR presents no evidence that the Project will make any headway towards achieving the 33% RPS target.

The EIR also violates CEQA: it obfuscates the scope of the Project, ignores its growth inducing impacts, and fails to support its conclusion that the Project will have no significant impact on climate change. Let’s be frank: By



adding energy transmission capacity this Project will remove an obstacle to enable sprawl development both in and around the forest.

## **II. The Project Description Omits and Obscures Critical Information.**

An EIR must include a clear and comprehensive description of the proposed project, which is critical to meaningful public review. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193. The court in *Inyo* explained why a thorough project description is necessary:

“A curtailed or distorted project description may stultify objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the “no project” alternative) and weigh other alternatives in the balance.” d. at 192-93. Thus, “[a]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 830.

The EIR fails to satisfy CEQA’s rigorous standard. First, the EIR states that “The proposed project is needed because the existing authorizations within the CNF are expired, and the existing power lines are needed to supply power to local communities, residences, and government-owned facilities located within and adjacent to the CNF” DEIR at ES-1. Nowhere, however, do we find a quantification of the power needs of existing communities or a description of both the communities and the environmental setting of the National Forest in which those communities are found. For example the EIR states that there will be a fourfold increase in capacity of the transmission lines, but without a definition of the current users served and their energy needs we have no explanation of what purpose this fourfold increase will serve. DEIR at G-3. Who will purchase the power? For what purpose? At what cost? The EIR’s revised project description should describe these and other fundamental terms.

Second, the EIR obliquely refers to the National Forest Setting but provides no overall description of the geographic and habitat uniqueness of the mountain area known as the Cleveland National Forest. Unique in all of Southern California, the geographic landforms in the San Diego County Mountains have created a series of valleys with large meadows, including the Doane, French, Mendenhall, Dyche, and Will Valleys on Palomar, the upland grasslands on Volcan Mountain, the area around Cuyamaca lake, Corte Madera meadow, south of Pine Valley, Laguna Meadow and Will Valley on Mount Laguna. All of these facts have produced a great diversity of habitats and species in the central portion of the Peninsular Range Province.

Located within the central area of the Peninsular Range Ecosystem, the habitat value of the Cleveland National Forest is illustrated in this recent settlement agreement with the Center for Biological Diversity to establish new



Wilderness areas. “We had a monumental moment last week that will have major implications on how we manage certain areas of the Cleveland National Forest,” said Cleveland Forest Supervisor Will Metz. “The Forest now has new areas managed as wilderness, which is the highest level of protection that the Forest Service can provide and especially important in this highly developed Region”<sup>1</sup> These brief descriptions about the value of the forest make evident that in the age of climate change and historic drought the overarching purpose of any infrastructure project within the Cleveland Forest is to serve the needs and purpose of the forest and not vice versa. Nowhere do we find in the EIR how the project serves the forest.

### **III. The Draft EIR Fails to Adequately Analyze Growth Inducing Impacts.**

An EIR must discuss the “Growth-Inducing Impact of the Proposed Project.” Guidelines § 15126(d). To meet this requirement, the EIR must “[d]iscuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment . . . .” Guidelines § 15126.2(d). Of particular relevance, the Guidelines note that a project can induce growth by “remov[ing] obstacles to population growth,” such as by expanding a waste water treatment plant to allow more construction within its service area. *Id.*

The EIR claims that the Project will not be growth-inducing stating “the increased capacity provided by SDG&E’s proposed project power line replacement projects would remove an obstacle to growth of new local renewable generation projects, and would therefore be considered growth-inducing under CEQA. It would be speculative, however, to draw any conclusion regarding specific growth that might occur since the proposed project, including alternatives considered, would not in and of themselves allow interconnections of new renewable generation projects.” DEIR at G-4. The EIR’s conclusion is unsupported and nonsensical. The fourfold increase in capacity will not only facilitate the delivery of energy from the 19 local renewable generation projects but will obviously, when delivered, remove a restriction to population growth by providing energy for new development. Is it credible to suggest that 19 new power generation projects are being constructed without the ability to transmit their energy? And is it credible to suggest that a fourfold increase in energy capacity and supply would not foster new growth?

Growth in San Diego’s backcountry cannot occur without energy to fuel, light, warm and cool new homes. For example, the proposed 1,746-unit Accretive/Lilac Hills project and the 430-unit Castlerock project will be served by energy from the grid—not from individual generators. Similarly, the County is considering an amendment to the County General Plan that would dramatically “upzone” certain private inholdings in the Cleveland National Forest. Namely, the Forest Conservation Initiative amendment would redesignate land to accommodate an additional 2,893 dwelling units in Alpine (Staff Recommendation), many of which would be served by energy from the grid.

According to the EIR for the County’s General Plan Update, SDG&E’s goal is to reduce peak energy demand by a total of 268 MW. GPU DEIR at 2.16-28. In contrast, “the proposed power line replacement projects would increase capacity to move electricity, thereby removing a possible obstacle to growth of

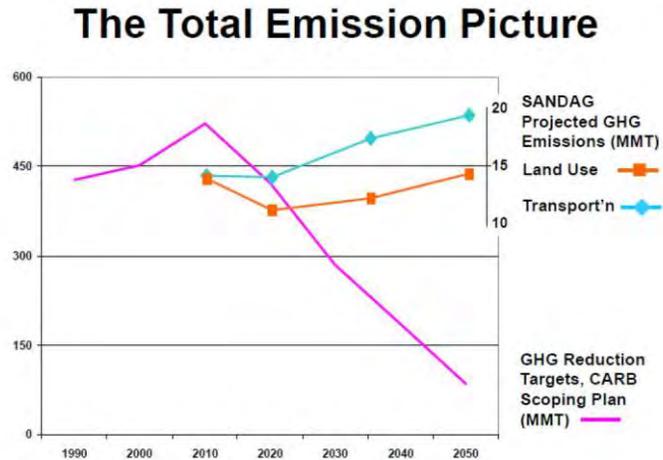
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<sup>1</sup> <http://www.fs.usda.gov/detailfull/cleveland/home/?cid=stelprd3821693&width=full>



new local renewable generation projects” (DEIR at G-3), without commensurately removing an existing non-renewable source. How is that movement in the opposite direction of SDG&E’s stated goal not growth inducing? Furthermore, the County is making no progress towards achieving the state-imposed 33% RPS, or the County’s Greenhouse Gas (“GHG”) reductions assumed in the County’s Climate Action Plan.

Other regional agencies, such as SANDAG, have analyzed the growth inducing impacts of providing transportation facilities. According to SANDAG, San Diego region’s land use pattern and resulting vehicle miles traveled (“VMT”) will result in a long term GHG emission picture as follows:



If SANDAG can determine the GHG impacts of regional patterns of growth, what is preventing the lead agencies from doing the same thing? The EIR should analyze the role that energy availability plays in these same growth patterns, and the resulting impacts.

Please include this corrected analysis of growth inducing impacts in the revised and recirculated draft.

#### **IV. The Draft EIR Fails to Adequately Analyze and Mitigate Climate Change Impacts.**

The DEIR fails to analyze how the project is consistent with San Diego County’s Climate Action Plan, which assumes SDG&E will fully comply with the state’s 33% RPS, and that such compliance will result in a reduction of 200,605 MT CO<sub>2</sub>(eq). The Revised DEIR should include this analysis. Insofar as the project analysis is based on the County’s former Climate Action Plan that was declared inadequate by Appellate Court decision D064243, the revised DEIR should conform to the new standard. The growth inducing impacts of increased energy capacity and new energy generation will also generate GHG emissions that must be analyzed in the DEIR.

#### **V. The DEIR Must Include a Distributed Generation Alternative.**

The Project proposes a massive upgrade in the capacity of energy transmission lines throughout the forest. It would result in significant



environmental impacts related to visual resources, hydrology and water quality and land use and planning. The Project will violate the Wilderness Act by including replacement and motorized use in the congressionally designated Hauser Wilderness. The lead agencies must not approve such a project when feasible alternatives—such as rooftop solar and microgrid—exist.

CEQA requires every EIR to analyze a reasonable range of project alternatives. *See* § 21100(b)(4); Guidelines § 15126.6(a). The alternatives analysis lies at “[t]he core of an EIR” because it informs the decisionmakers and the public about ways of accomplishing some or all of the proposed project’s objectives with fewer environmental impacts. *Citizens of Goleta Valley v. County of Santa Barbara*, 52 Cal.3d 553, 564 (1990); Guidelines § 15126.6(b). To be considered “reasonable,” the range of alternatives analyzed in an EIR must provide enough variation from the proposed project “to allow informed decisionmaking.” *Mann v. Community Redevelopment Agency*, 233 Cal.App.3d 1143, 1151 (1991). The project alternatives must also avoid or substantially lessen the project’s significant environmental impacts while attaining most of the project’s basic objectives. *See* § 21100(b)(4); Guidelines § 15126.6(a) & (b). Finally, the lead agency must publicly disclose its reasoning for selecting the alternatives included in an EIR.

To achieve an adequate range of alternatives to the proposed Project, the lead agencies must evaluate a “distributed generation” alternative. Distributed generation (“DG”) is a method of generating electricity from multiple small energy sources very near to where the electricity is actually used. The microgrid system, for example, would be perfectly suited to the forest area whose sparse populations are concentrated in small country towns. In addition another alternative is DG, or rooftop solar. DG can accomplish the same goals as utility-scale solar projects—i.e., the development of large quantities of renewable energy—but with substantially reduced environmental impacts as it does not require developing undeveloped land. Thus, the revised EIR must analyze the feasibility of a DG or microgrid alternative. Additionally the localized energy alternatives would obviate the fire danger inherent in transmission lines.

Clearly the \$450 million project cost could cover an alternate DG or microgrid system to serve the existing users as stated in the project need.

## VII. Conclusion

For the foregoing reasons, CNFF urges the lead agencies to delay further consideration of the Project unless and until it prepares and recirculates a revised draft EIR that fully complies with CEQA.

Sincerely,



Duncan McFetridge  
Executive Director  
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November 4, 2014

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**Subject: A.12-10-009: SDG&E's Master Special Use Permit – Comments on Draft Environmental Impact Report/Environmental Impact Statement**

Dear Ms. Orsaba and Mr. Metz:

Thank you for the opportunity to participate and provide comments on the draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for San Diego Gas & Electric Company's (SDG&E's) Master Special Use Permit (Project). These comments are submitted on behalf of Protect Our Communities (POC) and Bill Powers.

**I. The DEIR/EIS's rejection of POC-proposed alternatives without carrying them forward for full analysis is unjustified. Some alternatives were rejected without any explanation in the DEIR/EIS.**

The DEIR/EIS's rejection of alternatives proposed by POC in POC's two scoping comment letters does not adhere to the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA). NEPA regulations require an agency to "rigorously explore and objectively evaluate all reasonable alternatives" (40 C.F.R. § 1502.14(a)). Furthermore, NEPA requires explanation of why alternatives were eliminated from detailed analysis (40 C.F.R. § 1502.14(a)). Similarly, CEQA requires explanation of why rejected alternatives are considered infeasible (Id. at § 15126.6, subd. (c)). The rejection of two POC alternatives without either analysis or discussion of why they were rejected is especially troubling because under CEQA, the lead agency cannot simply ignore comments from the public, but instead must consider all "comments it receives on a draft environmental impact report, proposed negative declaration, or proposed mitigated declaration" (Cal. Pub. Resources Code, § 21091, subd. (d)(1); CEQA Guidelines, § 15074, subd. (b)).

POC's alternatives meet the NEPA standard of *reasonable*:

Section 1502.14 requires the EIS to examine all reasonable alternatives to the proposal. In determining the scope of alternatives to be considered, the emphasis is on what is "reasonable" rather than on whether the proponent or applicant likes or is itself capable of carrying out a particular alternative. Reasonable alternatives include those that are practical or

feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.<sup>1</sup>

POC's alternatives also meet the CEQA standard of *feasible*: "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Cal. Pub. Resources Code, § 21061.1).

A selection of rejected POC alternatives and the reasons why their rejections are unjustified is discussed below. The bolded titles are those used in the DEIR/EIS, followed by the descriptions from POC's scoping and supplemental scoping comment letters.

1. **Underground all tie-lines and circuits alternative.** A similar proposed alternative was described in POC's supplemental scoping letter of March 7, 2014 in the following passage:

Undergrounding of all 69 kV and 12 kV line segments. SDG&E generally describes the exclusive use of undergrounding as prohibitively expensive. However, the estimated cost to underground 69 kV transmission lines is \$1.5 million per mile.<sup>1a</sup> The approximate length of the MSUP 69 kV and 12 kV line segments is about 150 miles. Undergrounding the entire MSUP Project would cost on the order of \$1.5 million per mile × 150 miles = \$225 million, or about one-half the estimated \$418.5 million cost of the proposed MSUP Project. Undergrounding the entire Project is clearly cost-feasible relative to the cost of the proposed MSUP Project. (POC 3-7-14 letter, page 1)<sup>2</sup>

The DEIR/DEIS states that "This alternative would likely meet the reliability needs for existing energy users, and therefore screening criteria for project objectives and purpose and need, but may not meet screening criteria for feasibility due to potential construction challenges within the surrounding undeveloped rugged terrain which in many areas exceeds the maximum allowable (12%) slope conditions that would allow for underground construction practices." (page C-13)

The vague possibility of "potential construction challenges" is not an adequate basis for rejecting POC's undergrounding alternative. In order to reject this alternative as infeasible, the EIR/EIS must provide substantial evidence that there would be actual construction challenges (e.g., describing location-specific challenges) and why they cannot be overcome.

- For example, the DEIR/EIS does not provide relevant citations that state explicitly that the 12% is the maximum slope allowable for underground construction practice. These need to be provided as well as a factually supported explanation of why this

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<sup>1</sup> See page 4, Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations. 46 Fed. Reg. 18026 (March 23, 1981). Available at <http://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf>.

<sup>1a</sup> See paragraph 3 at Power Grid International, Underground vs. Overhead: Power Line Installation-Cost Comparison and Mitigation, February 1, 2013. [http://www.elp.com/articles/powergrid\\_international/print/volume-18/issue-2/features/underground-vs-overhead-power-line-installation-cost-comparison-.html](http://www.elp.com/articles/powergrid_international/print/volume-18/issue-2/features/underground-vs-overhead-power-line-installation-cost-comparison-.html).

<sup>2</sup> POC's letter is available at [http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF\\_Supplemental\\_Scoping\\_Comments.htm](http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Supplemental_Scoping_Comments.htm).

slope factor was used to reject POC's undergrounding alternative when the DEIR/EIS acknowledges that the proposed project itself could require undergrounding at a more than 12% slope. The DEIR/EIS states, "The underground concrete splice vaults would be approximately 21 feet long by 9 feet wide by 10 to 12 feet deep to facilitate the pulling and splicing of the cables, and would be installed every 1,000 to 1,500 feet depending on terrain, or at shorter intervals where horizontal road bends *or slopes in excess of 12% grade are encountered*" (Page B-30, emphasis added).

- Furthermore, the DEIR/EIS does not present evidence explaining why alternative routes, specifically selected to run alongside existing paved and dirt roads, could not be used that meet the 12% maximum slope criterion. The DEIR/DEIS acknowledges that "... terrain conditions along existing roadways would likely allow for underground construction practices . . ." (C-14). Evidence explaining this discrepancy needs to be provided in the EIR/EIS.
- In addition, the DEIR/EIS does not explain why the two alternative undergrounding methods already proposed in section B could not be used to increase the amount of undergrounding in the project: jack-and-bore and horizontal directional drill. The DEIR/EIS states, "Due to unique constraints along Boulder Creek Road, SDG&E would use jack-and-bore construction where open trenching is not feasible due to the presence of surface waters, such as where TL626 crosses Boulder or Cedar creeks, or where other surface features exist that prohibit the use of open trenching" (Page B-30). It also asserts, "Where open trenching or jack-and-bore techniques are infeasible due to local topography or environmental or engineering constraints, the use of HDD [Horizontal Directional Drill] methods may be required" (B-30 to B-31). To remedy this lack of explanation, the FEIS/EIR should either propose to use alternative undergrounding methods in more locations or provide evidence demonstrating why they would not be appropriate.
- Moreover, the DEIR/EIS should explain how the Forest Service knows that the resource impacts for undergrounding would be greater than overhead construction, given that the underground alternative was summarily rejected without study. The DEIR/EIS states, "The estimated total permanent footprint to replace all poles as proposed is approximately 0.3 acre. Assuming the estimated permanent footprint of 4 acres required to underground approximately 13 miles of 12 kV electric lines as proposed, undergrounding all 146 miles of existing electric lines under this alternative would result in a significant increase in permanent disturbance/impact to sensitive resources over that caused by the proposed wood-to-steel pole replacement" (C-13). However, the DEIR/EIS does not present evidence demonstrating that this estimate of .307 acres of permanent impacts per mile, derived from the current "as proposed" undergrounding would apply to conditions throughout the entire Project.

- The DEIR/EIS also does not present evidence to demonstrate how replacing more than 2,000 poles in this Project can result in only 0.3 acres of ground disturbance in total. It appears to be based on an assumption that the only ground disturbance that needs to be estimated is the footprint of the pole.<sup>3</sup> That assumes -- without providing evidence to support the assumption -- that all vegetation that is removed or disturbed in order to construct the Project will grow back just as it was previously. This assumption disregards the possibility of introducing nonnative and/or invasive vegetation species to locations such as staging areas; fly yards; micropile, removal and stringing sites; and ground disturbed by driving construction equipment from nearby roads to the existing poles.<sup>4</sup> The EIR/EIS needs to explain exactly how the 0.3 acres figure was calculated, including the assumptions on which it is based. In addition, it needs to provide evidence that shows those assumptions are reasonable.
- Furthermore, the rejection of POC's undergrounding alternative without carrying forward for full analysis does not consider how an undergrounding alternative would have fewer impacts on visual resources than the proposed Project. This same flaw exists in the DEIR/EIS's rejection without carrying forward for full analysis an alternative proposing undergrounding 45 miles of existing 69 kV and 12 kV electric lines along or in roadways (see C.5.8).<sup>5</sup> To remedy this deficiency, the EIR/EIS needs to include comparative analysis of the impacts on visual resources of undergrounding alternatives versus the proposed Project.

This is important because undergrounding would conclusively achieve a fundamental part of the agencies' stated purposes, needs, and objectives for this Project – reducing fire hazard in a high fire hazard area through fire hardening of facilities.<sup>6</sup> The agencies cannot reasonably state that the unverified impact of undergrounding the 69 kV and 12 kV lines is so significant that it justifies accepting the higher fire risk of aboveground 69 kV and 12 kV lines, when the act of undergrounding completely removes the fire hazard that is a key basis for the \$450 million Project. Evidence must be provided.

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<sup>3</sup> The DEIR/EIS's Table D.4-5 (Existing, Temporary, and Permanent Vegetation Impacts) states, "Permanent construction impacts involve the following: direct bury and micropile" (Page D.4-94).

<sup>4</sup> Two of the proposed mitigation measures, MM BIO-4 and MM BIO-5, concern restoration of habitat, but they do not explicitly mention invasive and non-native vegetation species. Measures to prevent spread of invasive and non-native vegetation species as a result of the project's ground disturbance do not appear to be included in the DEIR/EIS's other mitigation measures. See Table D.4-17.

<sup>5</sup> The rejection without putting forward for full analysis of the DEIR/EIS's C.5.8 undergrounding alternative also suffers from an assumption for which evidence is not provided: "While terrain conditions along existing roadways would likely allow for underground construction practices, **portions of this alternative may not meet feasibility criteria** due to roadway encroachment issues (i.e., California Department of Transportation and others) as well as other engineering issues associated with service to individual customers" (Page C-14, emphasis added). The EIR/EIS should either fully analyze this alternative or provide evidence that the alternative is actually infeasible.

<sup>6</sup> The agencies' purposes, needs, and objectives are stated on A-7 to A-8 of the DEIR/EIS.

The DEIR/DEIS itself states that there is much fire risk inside and near the Project's footprint and influence area. It states that

- “[A]ssets at risk from wildfire include all structures within approximately 40 miles to the west of SDG&E’s proposed project area, stretching to the urbanized areas of Valley center, Escondido, Ramona, Santee, El Cajon, Chula Vista, and some coastal cities. This area includes terrain, vegetation, and climate that have historically supported wildfire spread. . . . ***The result of an ignition under worst-case conditions would be potential wildfire threat to all structures and communities to the west of SDG&E’s proposed project area***” (Page D.8-11, emphasis added);
- “[Ma]ny of the forested areas in the MSUP/Power Line Replacement study area are being replaced with chaparral and scrub vegetation after a wildfire” and that chaparral species, especially when they include old chaparral, are a fuel type that is “highly flammable” and “contribute to the intensity of wildfire” (Page D.8-2);
- “Southern California chaparral” contains “some of the most volatile wildfire fuels in the United States” (Page D.8-2);
- “[T]he fire environment in the study area is considered one of several areas that are classified as ‘wildfire corridors’ because a large portion of the fuel bed has not burned in 40 years or more (SanGIS 2011). With the ratio of dead to live fuels gradually increasing with age, a parallel increase in fire intensity is expected” (Page D.8-3);
- “Based on Fire Hazard Severity Zone (FHSZ) mapping data (FRAP 2013), the proposed power line replacement projects would be located primarily within a Very High FHSZ, with some smaller portions located in areas classified as High FHSZ or Moderate FHSZ” (Page D.8-3);
- “In general, central and eastern San Diego County and southern Orange County include terrain that is favorable to wildfire spread including steep slopes, ravines, mountains, and valleys” (Page D.8-4);
- “Fire history records document nearly 900 wildfires within the study area between 1910 and 2012 (FRAP 2013). Additional wildfires that were excluded from that dataset because they were less than 10 acres in size have also occurred in the study area” (D-8.4); and
- Two of the largest fires recorded in California between 1923 and 2007 occurred in SDG&E territory and were caused by power lines: the Witch Creek fire (197,990 acres) and the Laguna Fire (174,158 acres) (D.8-6 to D.8-7).

In addition to the area’s high fire risk, the DEIR/DEIS acknowledges that undergrounding power lines in the Project area will reduce fire hazard. It describes many fire-related hazards associated with overhead power lines:

“Power and distribution lines can start fires in a number of ways, including the following:

- Uncleared vegetation, especially trees, coming into contact with lines or conductors
- Sparks (from exploding hardware such as transformers) coming into contact with vegetation
- Wind-blown debris coming into contact with hardware such as transformers and conductors
- Conductor-to-conductor contact
- Transmission poles blown down by high winds
- Dust or dirt buildup on power line hardware
- Aircraft or helicopter, or attached features such as fire-fighting water buckets, coming into contact with power line hardware and support structures
- Wildlife coming into contact with power line and/or associated hardware.” (Page D.8-44)

Moreover, the DEIR/EIS acknowledges that reducing the total mileage of overhead power lines by undergrounding will reduce fire ignition risk.

Power line relocation and undergrounding activities would remove 16.43 miles of existing 12 kV overhead power lines and replace/relocate them with 11.81 miles of new underground lines. Undergrounding activities will also allow for the removal of 11.2 miles of existing power line access roads. ***Approval of the proposed power line replacement projects would decrease the quantity and spatial extent of project facilities (roads) and overhead power lines in the project study area, thereby decreasing the quantity and extent of potential ignition sources.*** (Page D.8-46, emphasis added)

SDG&E previously acknowledged that undergrounding distribution lines can reduce risk from wildfire when it sought to amend Tariff Rule 20D “to facilitate converting overhead facilities to underground for fire safety purposes.” SDG&E’s application to the California Public Utilities Commission (CPUC) in that proceeding states, “SDG&E seeks Commission approval to amend Tariff Rule 20 to help reduce wildfire risk in those cases where undergrounding is preferable to other system hardening measures.”<sup>7</sup>

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<sup>7</sup> See pages 1 and 5 in SDG&E, “Application Of San Diego Gas & Electric Company (U 902 E) For Authority To Update Marginal Costs, Cost Allocation And Electric Rate Design” (October 3, 2011), available at <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/A/144715.PDF>. See also “Another option that can be very effective in reducing fire risk is to underground existing overhead electric distribution facilities” on page RG-2 in “Revised Prepared Direct Testimony Of Rick Gardner On Behalf Of San Diego Gas & Electric Company,” for the same CPUC proceeding, available at <https://www.sdge.com/sites/default/files/regulatory/Ch-8-Gardner.pdf>.

Additionally, the Master Special Use Permit Project's DEIR/EIS further acknowledges that overhead power lines can reduce the effectiveness of firefighting efforts, in Impact FF-3. The DEIR/EIS states,

The presence of overhead power lines can present various ground-based fire attack hazards. Wildland firefighters working around energized transmission lines may be exposed to electrical shock hazards including the following: direct contact with downed power lines, contact with electrically charged materials and equipment due to broken lines, contact with smoke that can conduct electricity between lines, and the use of solid-stream water applications around energized lines. Between 1980 and 1999 in the United States, there were 10 firefighter fatalities due to electrical structure contact during wildfire suppression (NFPA 2001). Maintaining a safety buffer greatly reduces the risk of electrical structure contact, and it may reduce the effectiveness of ground-based frontal attacks. Most firefighting agencies implement safety buffers as provided in the International Fire Service Training Association's Fundamentals of Wildland Firefighting manual (Goodson 1998). ***Depending on the fire circumstances, the presence of power lines may result in the decision to let a fire burn through an area before attacking with ground and aerial firefighting resources.***

A potential outcome of not providing immediate attack on a wildfire ignition is that it is able to build in size and intensity, especially under weather favorable to fire spread. Delays in containment allow for rapid fire perimeter growth through a fueled flaming front and through fire brand spotting. Vegetation containing dead material often results in ember production that, under windy conditions, can rapidly increase fire spread rate by igniting spot fires as much as 2 to 3 miles or more in front of the flame front. This type of fire behavior significantly complicates fire containment. (Pages D.8-48 to D.8-49)

***The presence of overhead power lines can present various aerial fire attack hazards including increasing the risk of power line direct contact by aircraft or water buckets, resulting in a "no fly" zone or restricting aerial water or retardant drop effectiveness in areas with power lines.*** Limiting the effectiveness of aerial fire containment activities can be considered significant since this form of fire attack has proven to be an especially effective means of slowing or containing fires, particularly in areas where there is limited access or longer response times. (Page D.8-48, emphasis added)

The DEIR-DEIS acknowledges that the presence of overhead power lines poses a conflict with firefighting efforts:

SDG&E's proposed Project would replace existing wood pole structures with new steel pole structures, in addition to minor relocation, removal, and undergrounding, generally within the same ROW alignment as the existing power lines. Power line relocation and undergrounding activities would remove 16.43 miles of existing 12 kV overhead power lines and replace it with 11.81 miles of new underground lines. The overall distance of overhead power lines would be reduced from 145.9 miles to 129.5 miles as a result of undergrounding portions of the system. ***Approval of the proposed power line***

*replacement projects would decrease the quantity and spatial extent of overhead power lines in the project study area, thereby decreasing the potential conflict with firefighting efforts.* (Page D.8-47, emphasis added)

In summary, since the DEIR/EIS itself acknowledges that (a) the Project area and inhabited areas up to 40 miles to the west are at high risk from fire, (b) overhead power lines can provide ignition sources for fires, (c) overhead power lines can interfere with both ground and air firefighting efforts and the latter impact is “significant,” and that (d) the undergrounding of power lines in the Project area would reduce potential ignition sources and decrease potential conflict with firefighting efforts, POC’s proposed undergrounding of all circuits alternative should receive full analysis as an alternative in the DEIR/EIS.

2. **DEIR-EIS System Alternative 3: No-Wire Alternative.** A similar proposed alternative was described in POC’s supplemental scoping letter of March 7, 2014 in the following passage:

A no-wires alternative (should be analyzed) using microgrids in town centers such as Boulevard and off-grid systems for more remote customers to eliminate the need for the 69 kV and 12 kV line segments included in the MSUP project. POC estimates that there are no more than 4,000 to 5,000 meters/customers along the 69 kV and 12 kV line segments included in the MSUP project interconnected with substations that are south of the Santa Ysabel substation and exclusively dependent on 69 kV lines included in the MSUP project. These substations are Descanso, Barrett, Cameron, Glencliff, Crestwood, and Boulevard. Assuming the average customer requires a 5 kW off-grid system and the cost of a typical 5 kW off-grid system is up to \$50,000 (without adjusting for tax credits), the total cost of a “no-wires” alternative to serve 4,000 to 5,000 meters would be in the range of \$200 to 250 million. SDG&E has a successful operational microgrid project at Borrego Springs. The no-wires alternative is technically feasible, economically competitive with the proposed MSUP project, and would definitively eliminate the fire hazard the MSUP project is intended to address. (POC 3-7-14 letter, pages 1-2)

There are multiple operational microgrids in San Diego County and the region. The DEIR/DEIS is wrong to state that (C-18): “While an alternative microgrid system may meet environmental and project objective screening criteria, it would not meet feasibility criteria. Because microgrids are an emerging technology and are not a proven large-scale technology at this time, the use of this technology on a system backbone scale is not a viable alternative.” There are only 4,000 to 5,000 customers in the Project area. “Microgrids” are intrinsically not large-scale.

SDG&E has an operational microgrid in Borrego Springs serving approximately the same number of customers as those located in the Project area. SDG&E publicizes the Borrego Springs microgrid as a 21st century solution to conventional power delivery. The UCSD microgrid is well-known in Southern California, has been operational for years, serves ten times the number of customers than those located in the MSUP Project area, and was relied

on by SDG&E for emergency electricity supply during the 2007 firestorm that heavily impacted the CNF.<sup>8</sup>

The USMC operates microgrids at MCAS Miramar (San Diego) and the 29 Palms Marine Corps Base (Riverside County). Each of these microgrids serves substantially more customers than those located in the MSUP Project area. The DEIR/DEIS offers no evidence to support its contention that microgrids are an emerging technology and not feasible. To the contrary, the success of multiple microgrids in San Diego County belie the claimed infeasibility of a microgrid-based electricity supply system for the MSUP Project area.

Examples of local/regional operational microgrids include:

1. SDG&E Borrego Springs Microgrid Project (the project was proven over the 2008-2013 timeframe):  
[http://energy.gov/sites/prod/files/30\\_SDGE\\_Borrego\\_Springs\\_Microgrid.pdf](http://energy.gov/sites/prod/files/30_SDGE_Borrego_Springs_Microgrid.pdf)
2. UT San Diego on Borrego Springs Microgrid Project:  
<http://www.utsandiego.com/sponsored/2013/nov/10/sgde-repair-crews-storm/>
3. UC San Diego Microgrid: <http://sustainability.ucsd.edu/highlights/microgrids.html>
4. Marine Corps Air Station Miramar Microgrid:  
[http://www.nrel.gov/tech\\_deployment/microgrids.html](http://www.nrel.gov/tech_deployment/microgrids.html)
5. 29 Palms Marine Corp Base Microgrid (Riverside County):  
<http://www.desertsun.com/story/tech/science/energy/2014/03/29/twenty-nine-palms-co-generation-power-plant/7069857/>

The rationale offered in the DEIR/DEIS for elimination of the microgrid alternative is nonsensical: “The power lines and distribution circuits proposed for replacement have been in operation for decades and are needed to ensure continued electric service and reliability to local communities” (Page C-17). According to SDG&E, the power lines and distribution circuits that are proposed for replacement are the problem this \$450 million proposed Project is supposed to solve, not a sacred cow that must be preserved. The fire hazard of the existing power lines and distribution circuits is the fundamental reason for the fire hardening Project. Any alternative solution that would eliminate the root cause of the fire hazard should presumptively be evaluated in detail in the EIR/EIS.

3. **DEIR-EIS System Alternative 4: Fire harden with similar materials and improve fire-hardening by increasing vegetation management and system maintenance oversight.** A somewhat similar proposed alternative was described in POC’s scoping letter of November 7, 2013 in the following passage:

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<sup>8</sup> See UT San Diego, “Generation of power outside SDG&E grid,” November 17, 2007. Available as **Attachment A**.

The DEIR/DEIS should analyze a new alternative of renewing and issuing permits as needed on federal lands to keep existing facilities working, and increasing vegetation management and equipment inspections. No wooden poles would be changed to steel poles. This is different than the Forest Service's proposed no action alternative in two respects: issuing the permits, and increased vegetation management and equipment inspections. POC would like to see this new alternative analyzed because of its reduced environmental and community impacts. (POC 11-7-13 letter, page 5).<sup>9</sup>

The Division of Ratepayer Advocates (DRA) Protest makes clear that SDG&E has not even established a compelling basis for the Project. Wooden transmission/distribution poles have not been established as a significant source of fire hazard (DRA, p. 5): *March 2009 USFS data show a total of 1,626 fires on USFS lands within the CNF from 1970 to 2007. Only 29 (or 1.8%) of the 1,626 fires recorded are power-line related fires. Specifically, the Witch, Guejito, and Rice fires of 2007 were caused by high winds and power lines contacting vegetation.*<sup>10</sup>

The 2007 fires were caused by SDG&E failure to maintain adequate clearance between combustible vegetation and the 69 kV and 12 kV power lines. The fires were caused by failure to follow established safety procedures, not by wooden poles. DRA Protest, p. 6: *In 2008, at the time of the Witch and Rice Fires, the Commission's Consumer Protection Safety Division (CPSD) found that SDG&E had failed to comply with GO 95 fire safety measures. . . . SDG&E has failed to show that the safety and fire risk mitigation measures of the Commission, CalFire, the Forest Service, and its own initiatives are so inadequate that the CNF Projects are necessary.*

SDG&E has not shown how any of the cause agents of recent major fires in the CNF will be altered by converting wooden poles to steel poles, or why greater attention to vegetation management will not completely resolve the fire hazard potential.

5. **DEIR-DEIS Alternative Pole Design 1 - Height.** A somewhat similar proposed alternative was described in POC's scoping and supplemental scoping letters of November 7, 2013 and March 7, 2014 in the following passages:  
Another alternative that should be analyzed in the EIR/EIS is using replacement poles (whether they are steel or composite) that are closely matched in height, and as much as possible, in diameter, to the existing wooden poles they are replacing. This would have much less visual impact on the Cleveland National Forest, BLM lands, tribal lands, and surrounding communities, than the up to 120' tall and 3' to 5' in diameter at their base 69

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<sup>9</sup> This letter is available at [http://protectourcommunities.org/wp-content/uploads/2013/11/poc\\_msup\\_scoping\\_comments\\_web](http://protectourcommunities.org/wp-content/uploads/2013/11/poc_msup_scoping_comments_web).

<sup>10</sup> See page 5 at Ouyang, Ke Hao and Cleveland Lee (CPUC), "Protest of the Division of Ratepayer Advocates of San Diego Gas and Electric Company's Application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects" available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M031/K744/31744032.PDF>.

kV steel poles and larger than existing 12 kV steel poles that SDG&E has proposed.<sup>11</sup> If this alternative is not feasible due to CPUC or other regulation, the EIR/EIS should explain in detail exactly which regulation(s) prevent it. (POC 11-7-13 letter, pages 5-6)

Clarification to like-for-like pole size replacement alternative: POC would also like to clarify the description of the like-for-like pole size replacement alternative that POC requested in its November 7, 2013 comment letter on the EIR/EIS scoping memo. The clarification is that the like-for-like poles carry conductors of the same or similar capacity to the conductors that are on the existing wood poles. For example, the minimum conductor size recommended for a 69 kV line is a 3/0 ACSR conductor.<sup>4</sup> Yet SDG&E is proposing to use much higher capacity 636 kcmil ACSS conductors on the 69 kV lines. The like-for-like pole size replacement alternative should assume use of a 3/0 ACSR conductor or equivalent. (POC 3-7-14 letter, page 3)

The DEIR/DEIS acknowledges that the proposed conductor will have the capacity to carry four times the electricity carried on the existing 69 kV lines, but asserts this conductor has been specified, for its extra weight, to reduce side-to-side swing of the conductor in high winds. Presumptively the reason to reduce the side-to-side swing is to minimize the potential for the conductor to come in contact with vegetation and start a fire in high winds.

The most effective way to achieve the fire avoidance goal is to maintain a rigorous vegetation trimming program. Even the heavier conductor will be a source of ignition if vegetation management is neglected and tree branches grow close to the transmission line conductors. The heavier conductor alone does not assure improved fire safety. However, the heavier conductor will allow the Project to carry far more electricity than the existing transmission system following relatively minor additional upgrades.

The DEIR/DEIS fails to evaluate the growth-inducing potential of increasing the carrying capacity of the existing 69 kV system by a factor of four.<sup>12</sup> The DEIR/EIS states, “The proposed power line replacement projects would increase capacity to move electricity, thereby removing a possible obstacle to growth of new local renewable generation projects” (G-3). The DEIR/EIS attempts to excuse the lack of analysis of growth-inducing impacts by stating,

Such projects are not dependent on the capacity of the proposed new conductors and double-circuit components, but rather on whether the California Independent System

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<sup>11</sup> See SDG&E’s Revised Plan of Development, page 28, available at <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm#applicationandplanofdevelopment>.

<sup>12</sup> This increase is acknowledged in the DEIR/EIS: “These new conductors will also result in a fourfold increase in the conductor’s ability to move energy as compared to the existing conductors” (Page G-3).

Operation (CAISO) completes the required generation interconnection process for any particular generation project. New generation projects must first complete the CAISO generator interconnection process as specified by the CAISO's FERC Tariff and Business Process Manual. The CAISO interconnection process requires detailed studies of any proposed generator project's effect on the power line system, including whether or not a proposed generator can connect reliably and safely to the system. (G-3).

However, this ignores the fact that by increasing capacity to move electricity near these proposed projects, the possibility that a CAISO study would stop development of these local renewable energy projects is greatly reduced or even eliminated. In other words, the increase in capacity to move energy associated with this proposed transmission Project would itself change CAISO study results.

In addition, the DEIR/EIS's assertions about CAISO do not present evidence specific to any of the locally proposed renewable energy projects in the CAISO interconnection queue even though there are as of today renewable energy projects in that queue that would be located in the Project area that are listed as having completed their studies and having executed or in-progress interconnection agreements.<sup>13</sup> At a minimum, the growth-inducing impacts of these projects should be analyzed in the EIR/EIS. Table F-2 should also be updated to include Phase II of the Tule Wind project, which was approved by the U.S. Bureau of Indian Affairs in December 2013.<sup>14</sup>

6. **POC's greater undergrounding for recreation areas alternative was rejected without analysis or any explanation in the DEIR/EIS.** There appears to be no alternative that was rejected or moved forward for analysis in the DEIR/EIS that is comparable to the proposed alternative that was described in POC's scoping letter of November 7, 2013 in the following passage:

The fourth new alternative that should be analyzed is more undergrounding near popular trails and near campgrounds. For example, the Loveland Reservoir Trail in Alpine is heavily used and will likely be seriously visually impacted by the project. (It's been POC's experience that simulations provided for projects underestimate visual impacts.) The Reservoir is a favorite place in the community, where families often take their children to fish. The public's experience there would benefit from undergrounding, and the same is true for other popular trails and the campgrounds the project lines run through or are immediately adjacent to. Undergrounding might also

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<sup>13</sup> See, for example, the renewable energy projects listed for Boulevard East Substation 138 kV. The queue is available at <https://www.caiso.com/Documents/ISOGeneratorInterconnectionQueue.pdf>.

<sup>14</sup> The project's Record of Decision is available at <http://www.biawind.com/wp-content/uploads/2014/01/ROD.pdf>.

increase public safety in these areas by reducing fire risk and risk of exposure to conductive steel poles. (POC 11-7-13 letter, page 6).

The concerns and potential remedies that POC has raised elsewhere in this comment letter regarding the DEIR/EIS's lack of adequate analysis for POC's undergrounding also apply here.<sup>15</sup>

## **II. The statute requires a Certificate of Public Convenience and Necessity (CPCN), and G.O. 131-D cannot eliminate the requirements of the statute.**

As discussed earlier, the DEIR/EIS fails to evaluate the growth-inducing potential of increasing the carrying capacity of the existing 69 kV system by a factor of four. But for transformer and safety equipment upgrades at five substations in the MSUP project area, work that should cost less than \$40 million total, less than 10 percent of the \$450 million estimated MSUP Project cost, the project will be fully capable of operating at 138 kV or 230 kV.<sup>16,17</sup>

The Commission has broad authority to issue CPCNs under sections 1001-1013 of the PU Code. The Commission promulgated regulations pursuant to this statutory authority in G.O. 131.

The Code provides for only highly limited (and here inapplicable) exceptions to this requirement, and does not provide for any alternative procedures by which the Commission may approve the construction or extension of a line without going through the full statutory CPCN process.

In clear violation of Section 1001, the Commission action fails to require that SDG&E's application be considered through the statutorily mandated CPCN process. Rather, the

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<sup>15</sup> POC's proposed alternative to reduce impacts in wilderness areas was similarly ignored in the DEIR/EIS. It is described in POC's 11-7-13 letter, page 6.

<sup>16</sup> Black & Veatch, *CAPITAL COSTS FOR TRANSMISSION AND SUBSTATIONS - Recommendations for WECC Transmission Expansion Planning*, prepared for Western Electricity Coordinating Council, October 2012, Tables 3-1, 302, and 3-3, pp. 3-1 to 3-3. Assume each of eight substations (Crestwood, Cameron, Barrett, Loveland, Descanso, Glenclyff, Boulder Creek, and Santa Ysabel) is upgraded to single line 230 kV service with 300 MVA rating. These substation sites are already owned by SDG&E so there would be no cost associated with purchasing and conditioning the sites. Cost per substation upgrade to single line 230 kV = + \$2.884 million (Table 3-2, two 230 kV line positions) + \$2.1 million (Table 3-3) = \$4.984 million. The cost to upgrade seven substations to single line 230 kV service = 8 x \$4.984 million = \$39.87 million. See **Attachment B**.

<sup>17</sup> The summer MW limit (MVA limit) of a single 636 kcmil conductor in 138 kV service is approximately 200 MW. The MW limit of a single 636 kcmil conductor in 230 kV service is approximately 300 MW (300 MVA). See **Attachment C**.

Commission action provides that SDG&E's Application is to be considered through an alternative, abbreviated "Permit to Construct" ("PTC") process. The PTC process is set forth in Commission General Order 131-D, and the Assigned Commissioner relies on this General Order as the basis for his Commission action.

The General Order may not be used by the Commission to excuse SDG&E from statutory requirements. Pursuant to Article XII, Section 5, of the California Constitution, the California State Legislature is vested with the sole, complete authority to define the Commission's powers and jurisdiction. The Legislature has exercised this plenary authority by defining the Commission's powers and jurisdiction in the California Public Utilities Code. The Commission is required to follow and obey the provisions of the Code. The Commission is required to proceed in the manner required by law, and may not act without, or in excess of, its (legislatively defined) powers and jurisdiction. Although the State Legislature has granted the Commission broad regulatory powers, Courts have made clear that the Commission does not have the authority to act in a manner "contrary to other legislative directives, or to express restrictions placed on the Commission's authority by the Public Utilities Code." Put simply, "the commission does not have the authority to contravene the will of the Legislature as expressed in [the Public Utilities Code]." Thus, to the extent that General Order 131-D, an internal Commission regulation, conflicts with the statutory requirements set forth in Public Utilities Code Section 1001 and related provisions, the General Order is invalid.

The "Permit to Construct" process set forth General Order 131-D and adopted in the Commission action is in direct conflict with Public Utilities Code Section 1001 and related provisions. The General Order divides lines into three categories: "transmission lines" designed to operate at or above 200 kV; "power lines" designed to operate between 50 and 200 kV, and "distribution lines" designed to operate at less than 50 kV. This categorization forms the basis of differing requirements for lines. While the General Order requires that utilities go through the full statutory process and procure a CPCN before constructing "transmission lines," the General Order purports to exempt "power lines" from the CPCN requirement, instead requiring that "power lines" go through a much less rigorous process to procure a "Permit to Construct" prior to beginning construction. SDG&E explicitly defines its 69 kV lines as transmission lines, stating: "The San Diego Gas & Electric's (SDG&E) transmission system (69 kV and above) is under the operational control of the California Independent System Operator (CAISO)."

The Commission's attempt to exempt "power lines" from the CPCN requirement is a direct violation of Public Utilities Code Section 1001. The plain language of Section 1001 makes clear that the CPCN requirement is meant to apply to all lines constructed by electrical corporations, and that the requirements of Section 1001 may not be selectively applied based on a line's categorization (i.e. "power lines" vs. "transmission lines"), cost, or carrying capacity. Section 1001 and related provisions use the broad term "lines." The plain meaning of the term "lines," and the lack of narrowing language makes clear that Section 1001 applies to all types of lines. This plain meaning is supported by Public Utilities Code Sections 1002, 1002.3, and 1005.1, which impose additional requirements

on the approval of electrical transmission lines, and in doing so differentiate between categories of lines by using the specific term “electrical transmission lines.” The fact that Section 1001 does not use this specific term is further evidence of its broad meaning.

The PTC process falls well short of the statutory CPCN process. While the statutory CPCN process provides for the consideration of a range of issues, the PTC process is limited to the consideration of whether or not “the project properly qualifies for an exemption to CEQA.” The statutory CPCN process allows for the consideration of project cost and need. Section 1003 requires extensive disclosures relating to cost and need, including “a cost analysis comparing the project with any feasible alternative sources of power” that includes “the financial impact of the plant, line, or extension construction.” For lines costing in excess of \$50 million dollars, Sections 1091-1102 impose the additional requirement that the project be overseen by a board of consultants charged, in part, with ensuring the project’s “economic soundness.” In contrast, the PTC process specifically excludes information regarding cost and need from the required disclosures, and, by limiting the Commission’s review to CEQA compliance, precludes the Commission’s review of cost and need issues.

In the alternative, even if General Order 131-D were fully consistent with the Public Utilities Code and therefore a valid basis for the Commission action, the Commission action’s failure to require that SDG&E go through the full statutory process and procure a CPCN prior to construction would still constitute a significant error.

General Order 131-D requires that utilities constructing or modifying “transmission lines” procure a CPCN before construction, while utilities constructing or modifying “power lines” are required to go through the much less intensive process of securing a PTC. The General Order distinguishes between “power lines” and “transmission lines” based on carrying capacity:

For the purposes of this General Order, a transmission line is a line designed to operate at or above 200 kilovolts (kV). A power line is a line designed to operate between 50 and 200 kV.<sup>18</sup>

The fact that the Order categorizes lines based on the capacity the line was “designed to operate” at, rather than the capacity that it is “intended to operate” at, requires an objective analysis of the line’s design, rather than a subjective analysis of the Utility’s claimed intent.

The Commission action errs by granting SDG&E’s request to treat its requested Project as a “power line” eligible for PTC treatment based on SDG&E’s own subjective assertions, rather than an objective analysis of the line’s design. In its June 26, 2013 Amended Application, SDG&E characterizes its requested Project as an in-kind replacement of existing wood poles with steel poles.<sup>19</sup> This, SDG&E claims, which would constitute a “reconstruction of the 69kV power lines,”<sup>20</sup> which would fall within the 50 to 200 kV “PTC” range set forth in G.O. 131-D.

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<sup>18</sup> G.O. 131-D, at p. 1

<sup>19</sup> SDG&E Amended Application at p. 2. Available at [http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF\\_Amended%20Application.pdf](http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF_Amended%20Application.pdf).

However, an objective analysis of the proposed line's design reveals that the Project is clearly capable of operating at 230 kV, and is in no way limited by design to the claimed 69 kV. First, as POC noted in its July 26, 2013 Protest, Standard 69 kV poles generally run from 50 to 70 feet in height.<sup>21</sup> SDG&E's proposed steel monopoles, in contrast, will have a maximum height of 100 to 120 feet, with a 3 to 5 foot diameter base.<sup>22</sup> The proposed monopoles are the same size as the double-circuit 230 kV monopoles constructed by SMUD in a recent project and proposed by IID in another project.<sup>23,24</sup> This significant pole size upgrade is consistent with a line capable of operating at 230 kV, and the actual replacement monopoles proposed by SDG&E are of the type generally used in 230 kV lines.

Second, the conductor line that SDG&E is proposing to use for much of the length of the Project, a bundled 636-kcmil (1,000 circular mills) aluminum conductor steel support/aluminumweld (ACSS/AW), is the same conductor line that SDG&E has previously used in 230 kV lines.<sup>25</sup>

Third, SDG&E has projected the cost of the requested pole replacement project at \$450 million for about 150 miles of total 69 kV and 12 kV line segments, or \$3.0 million per mile. This is greatly out of proportion with the cost of a 69 kV project, and is much more consistent with the expected cost of a large-scale upgrade to a 230 kV line. A 69 kV like-for-like project should cost on the order of \$350,000/mile or less,<sup>26</sup> whether built with wood or steel poles, about one-tenth the cost of SDG&E proposal.<sup>27</sup> This is a like-for-like project cost on the order of \$50 million.<sup>28</sup>

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<sup>20</sup> *Id.*

<sup>21</sup> POC Protest at p. 3. Available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M075/K391/75391603.PDF>.

<sup>22</sup> *Id.*

<sup>23</sup> See **Attachment D**.

<sup>24</sup> See **Attachment E**.

<sup>25</sup> SDG&E, *SDG&E Miguel–Mission 230kV #2 Project PEA – Project Description*, July 2002, pages 1-5, available at [http://www.cpuc.ca.gov/environment/info/aspem/miguel\\_mission\\_pea/text/Chapter%2001%20-%20Project%20Description.pdf](http://www.cpuc.ca.gov/environment/info/aspem/miguel_mission_pea/text/Chapter%2001%20-%20Project%20Description.pdf).

<sup>26</sup> See Salt River Project, *Browning-McPherson and Browning-Scussel 69 kV projects: Questions and Answers*, 2014, available at <http://www.srpnet.com/electric/transmission/browningmcpersonFAQ.aspx>: "69-kV lines are built on steel or wood poles about 65 feet tall. . . Burying a single-circuit 69kV power line costs about \$3.5 million per mile - 10 times the cost for overhead construction."

<sup>27</sup> Public Service Commission of Wisconsin, *Underground Electric Transmission Lines*, May 2011, p. 17: <https://psc.wi.gov/thelibrary/publications/electric/electric11.pdf> "A typical new 69 kV overhead single-circuit transmission line costs approximately \$285,000 per mile as opposed to \$1.5 million per mile for a new 69 kV underground line (without the terminals). A new 138 kV overhead line costs approximately \$390,000 per mile as opposed to \$2 million per mile for underground (without the terminals)."

<sup>28</sup> \$350,000/mile × 150 miles = \$52.5 million.

The DRA November 26, 2012 Protest notes the excessive cost associated with the proposed project.<sup>29</sup> SDG&E’s proposal even exceeds the projected cost of building a 138 kV line in San Diego County by a factor of five.<sup>30</sup>

In light of the strong evidence that SDG&E’s proposed Project is intended to operate at 230 kV, if Commission action’s reliance on G.O. 131-D is valid, the Commission action errs in violating G.O. 131-D by failing to properly categorize the proposed Project based on the lines objective design. If properly categorized pursuant to the General Order’s requirements, SDG&E’s Project is a Transmission Line and SDG&E is required to go through the CPCN process and secure a CPCN before beginning construction.

### **III. The DEIR/EIS’s economic analysis is inadequate under NEPA.**

This Project will have significant cost impacts on the public, and the DEIR-DEIS’s economic analysis of them is inadequate. NEPA states that economic considerations will be taken into account: “[A]ll agencies of the Federal Government shall . . . (B) identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking *along with economic and technical considerations*” (42 U.S.C. 4331 § 102(2)(B), emphasis added).

However, the Project’s economic considerations are not truly being considered, either in the DEIR/EIS under NEPA or in the separate CPUC regulatory approval process. This lack of consideration is contrary to the CPUC’s mission, which states, “The California Public Utilities Commission serves the public interest by protecting consumers and *ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates*, with a commitment to environmental enhancement and a healthy California economy” (emphasis added).<sup>31</sup> The CPUC itself, through the DRA, has already stated, “[M]ost if not all of the \$418.5 million estimated cost for the CNF [Cleveland National Forest] Projects would fall on SDG&E ratepayers”.<sup>32</sup> In addition, the CPUC’s DRA “finds that assuming no changes to the Projects’ scope and costs, such as overruns, the CNF Projects would raise SDG&E’s rates by 1% to 2% over current

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<sup>29</sup> See Ouyang, Ke Hao and Cleveland Lee (CPUC), “Protest of the Division of Ratepayer Advocates of San Diego Gas and Electric Company’s Application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects” available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M031/K744/31744032.PDF>.

<sup>30</sup> P. Vigansky, P.E. - TriAxis Engineering, Inc, Transmission Line Cost Estimates for the Soitec Facility at Tierra Del Sol, July 29, 2013. “Per-mile construction cost estimate of a Single-Circuit 138-kV Overhead transmission line using guyed steel poles and designed for a 60-MW solar project: \$559,000/mile. Per-mile construction cost estimate of a 138-kV underground transmission circuit for a 60-MW solar project: \$2,000,000/mile.” See **Attachment F**.

<sup>31</sup> The CPUC’s mission statement is available at <http://www.cpuc.ca.gov/PUC/aboutus/pucmission.htm>.

<sup>32</sup> See page 3 of Ouyang, Ke Hao and Cleveland Lee (CPUC), “Protest of the Division of Ratepayer Advocates of San Diego Gas and Electric Company’s Application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects” available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M031/K744/31744032.PDF>.

levels,”<sup>33</sup> which was based on the Project’s original \$418.5 million Project price tag. The DRA has also stated that “the \$418.5 million costs of the CNF Projects rank higher than the estimated cost for over 95% of projects that the CAISO [California Independent System Operator] deems necessary to improve reliability and efficiency”.<sup>34</sup>

The need for a financial cost comparison of alternatives has since become even greater than it was when the CPUC made these statements. Recent news coverage indicates that the Project’s estimated cost is now \$450 million.<sup>35</sup> In other words, the Project’s estimated cost has jumped upward by \$31.5 million in less than two years, an increase of nearly 8 percent. The CPUC will not be able to abide by its mission and ensure that rates are reasonable if it does not compare the estimated costs of SDG&E’s proposed Project with the estimated costs of a fully analyzed range of alternatives *before* it makes its decision whether to approve the Project. After all, as explained earlier in this letter, two of POC’s suggested alternatives that were not advanced for full analysis in the DEIR/EIS and that would fulfill most of the Project’s purpose and need and project objectives could reduce the Project’s cost by approximately 50% to 75%.

Therefore, POC again requests that the comparative costs of this proposed Project be analyzed. The EIR/EIS provides a suitable vehicle because NEPA allows cost-benefit analysis and states, “If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the [Environmental Impact] statement as an aid in evaluating the environmental consequences.” (40 CFR § 1502.23) Furthermore, SDG&E has asserted its belief that if there are meritorious issues, the appropriate place for cost analysis is the environmental review process: “DRA’s identified costs issues go beyond the Commission’s PTC requirements, as set forth by D.94-06-014 adopting GO 131-D, and assuming arguendo they have any merit, such assertions are more appropriately set aside for the Commission’s independent consideration of a project’s costs and economic analysis for CEQA compliance.”<sup>36</sup>

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<sup>33</sup> See page 4 of See page 3 of Ouyang, Ke Hao and Cleveland Lee (CPUC), “Protest of the Division of Ratepayer Advocates of San Diego Gas and Electric Company’s Application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects” available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M031/K744/31744032.PDF>.

<sup>34</sup> The CPUC’s Project Objectives include “Improve the reliability of power delivery to surrounding communities” (DEIR/EIS, page A-8.) For the DRA’s statement about the comparative cost of reliability projects, see page 7 of Ouyang, Ke Hao and Cleveland Lee (CPUC), “Protest of the Division of Ratepayer Advocates of San Diego Gas and Electric Company’s Application for a Permit to Construct the Cleveland National Forest Power Line Replacement Projects” available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M031/K744/31744032.PDF>.

<sup>35</sup> See paragraph 2 at Jones, J. Harry, “Power-line upgrades looming for forest land, U-T San Diego (Oct. 23, 2014), available at <http://www.utsandiego.com/news/2014/oct/23/tp-power-line-upgrades-looming-for-forest-land/>.

<sup>36</sup> See page 10, SDG&E, “Reply Of Applicant San Diego Gas & Electric Company (U 902 E) To Protest Of The Division Of Ratepayer Advocates,” December 6, 2012, available at <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M039/K598/39598894.PDF>.

#### **IV. The Project's cumulative impacts are inadequately analyzed in the DEIR/DEIS.**

There are deficiencies in the DEIR/EIS's cumulative impacts analysis that need to be remedied. First, the temporal and geographic scales of the cumulative impacts analysis are not clearly defined and justified.<sup>37</sup> The DEIR/EIS states that the current condition of the Project area is used as a proxy for past impacts, but the time frame for future impacts is not provided (Page F-1). The geographic area for the cumulative impacts analysis is also uncertain, with at least 11 projects referenced in the DEIR/EIS's cumulative impacts section apparently being outside the Project study area (e.g., ECO substation, Energia Sierra Juarez wind project, Energia Sierra Juarez transmission lines, Imperial Valley Solar-Solar Two, Jacumba Solar Farm, Amonix Jacumba CPV Solar, Ocotillo Wells Solar, Soitec Solar-Los Robles, Soitec Solar-LanEast Solar Farm, Soitec Solar-LanWest Solar Farm, and Rugged Solar).<sup>38</sup> To be clear, POC is not arguing here that projects outside the Project study area be excluded from the cumulative impacts analysis. Instead, the DEIR/EIS should be revised to clearly define and justify the temporal and geographic scale of the cumulative impacts analysis. The analysis itself should also be revised to reflect these newly defined and justified scales.

Second, it is uncertain why some projects outside the Project study area have been included in the cumulative impacts analysis and some have not. For example, the Ocotillo Wells solar project has been included, but the nearby Seville Solar project has not.<sup>39</sup> It is not a matter of only analyzing projects that are located in San Diego County because the Imperial Valley Solar – Solar Two project is included in the cumulative impacts analysis and would be sited in Imperial County. The DEIR/EIS's lack of clarity regarding how renewable energy project are chosen to be included in the cumulative impacts analysis is another reason why the DEIR/EIS should be revised to clearly define and justify the geographic scale of the cumulative impacts analysis.

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<sup>37</sup> The importance of temporal and geographic scales in NEPA cumulative impacts analysis is discussed on pages 160 to 165 of Schultz, Courtney A. "History of the Cumulative Effects Analysis Requirement Under NEPA and Its Interpretation in U.S. Forest Service Case Law," *Journal of Environmental Law and Litigation* . Vol. 27, 125 (2012). Available at <http://www.fs.fed.us/rmrs/docs/human-restoration/legal-issues/cumulative-effects-analysis.pdf>.

<sup>38</sup> See Figure B-1 in the DEIR/EIS for a map of the project study area. The 11 projects this comment letter specifically names as apparently being outside the project study area are listed in the DEIR/EIS on pages F-3 to F-5. Table F-2 may include others that are also outside the project study area. To see which projects are outside the project study area, compare, for example, San Diego County's December 2013 renewable energy project map with Figure B-1. The San Diego County renewable energy project map is available at <http://www.eastcountymagazine.org/sites/eastcountymagazine.org/files/2014/February/Energy%20projects%20Countywide%2012-19-13%20Map.pdf>.

<sup>39</sup> For the location of the Seville Solar project, see Figure 2.0-1 in Seville Solar Farm Complex Draft EIR (April 2014), available at <ftp://ftp.co.imperial.ca.us/icpds/eir/seville-solar-complex/05project-description-part1.pdf> (page 2.0-4).

## V. Summary

In summary, the DEIR/EIS needs further explanation and analysis:

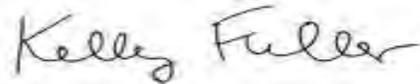
- The DEIR/EIS's rejection of POC-proposed alternatives without carrying them forward for full analysis is unjustified. Some alternatives were rejected without any explanation in the DEIR/EIS;
- The statute requires a Certificate of Public Convenience and Necessity (CPCN), and G.O. 131-D cannot eliminate the requirements of the statute;
- The DEIR/EIS's economic analysis is inadequate under NEPA; and
- The Project's cumulative impacts are inadequately analyzed in the DEIR/DEIS.

Thank you for this opportunity to comment on the DEIR/EIS. Please keep POC on the notification list for this proceeding via the two contacts below.

Sincerely yours,



Bill Powers, P.E.  
Member, POC Board of Directors  
[bpowers@powersengineering.com](mailto:bpowers@powersengineering.com)



Kelly Fuller  
Executive Director, POC  
[kelly@kellyfuller.net](mailto:kelly@kellyfuller.net)

## Attachment A

**SAN DIEGO UNION TRIBUNE -- LETTERS**

## **Generation of power outside SDG&E grid**

11/17/07

Regarding "Power Links in Peril?" (A1, Nov. 13):

As interim vice chancellor for resource management and planning at the University of California San Diego, I would like to comment that the story made clear the importance of distributed generation and development of power separate from the SDG&E grid. Also clear is the need to work pro-actively and cooperatively with our neighbors.

During the wildfires, UC San Diego proved the importance of distributed generation in helping the region avoid rolling blackouts. In support of the San Diego community, the campus was able to reduce its imported power to zero and export up to 4.5 megawatts of power to support the SDG&E grid during the day. This 4.5 megawatts of electricity is enough to power 4,000 homes. When SDG&E was struggling with power challenges, the UCSD-distributed generation system was providing critical support for the region.

The benefits of distributed generation often go unnoticed until times of crisis. But efforts from UCSD and other sources prove the efficacy of this technology and its importance in San Diego's overall energy planning strategy. This technology should be properly incentivized to assure our regional energy "cul-de-sac" can meet the extremes we will undoubtedly face in this era of global climate change.

**GARY C. MATTHEWS**  
*San Diego*

# CAPITAL COSTS FOR TRANSMISSION AND SUBSTATIONS

Recommendations for WECC  
Transmission Expansion Planning

**B&V PROJECT NO. 176322**

PREPARED FOR



Western Electricity Coordinating Council

OCTOBER 2012

**Principal Investigators:**

Tim Mason, Project Manager

Trevor Curry

Dan Wilson



### 3.0 Substation Capital Costs

Transmission cost estimates often only consider the conductor cost, without consideration of the requirements for new substation facilities needed to connect the transmission to the existing grid. This section quantifies the substation costs associated with transmission infrastructure development.

There are numerous considerations that go into the design of a substation that will significantly impact the cost of the facility. For the purpose of this effort, however, the Peer Review Group adopted a methodology that was simple enough to be repeatable, but granular enough to estimate a capital cost for various sized substations with different line and transformer positions, additional reactive equipment, or new transformers. Since HVDC lines were also identified in the transmission capital costs, HVDC converter station equipment and costs were also estimated. The following cost components were identified to calculate the substation cost:

- Base Substation Cost
- Line/Transformer Positions
- Transformer
- HVDC Converter Station
- Static VAR Compensator, Shunt Reactors and Series Capacitors

#### 3.1 NEW SUBSTATION BASE COST

Black & Veatch first identified a set of base substation costs, which excludes all major equipment. Since substations can be built in very remote areas, it was important to note that the substation costs in this methodology assume flat, barren land with relatively easy site access. The new substation costs, which include land, substation fence, control building, etc are identified in Table 3-1 below.

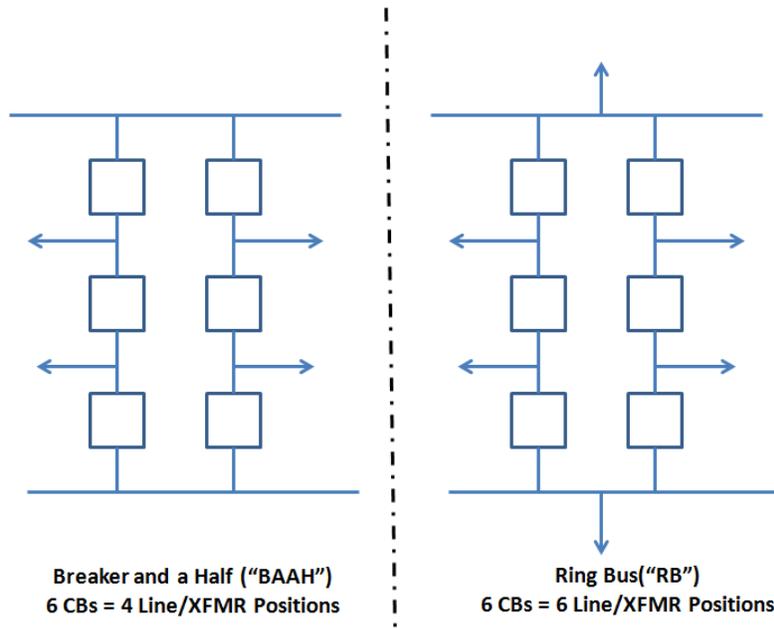
**Table 3-1 New Base Substation Capital Costs**

| EQUIPMENT                  | 230 KV<br>SUBSTATION | 345 KV<br>SUBSTATION | 500 KV<br>SUBSTATION |
|----------------------------|----------------------|----------------------|----------------------|
| Base Cost (New Substation) | \$1,648,000          | \$2,060,000          | \$2,472,000          |

#### 3.2 LINE AND TRANSFORMER POSITIONS

In addition to the substation base cost Black & Veatch considered the cost of breaker positions necessary to interconnect lines and transformers for new and existing substations. All of these require circuit breakers and switches for isolation of equipment. This isolation can be designed in multiple configurations; however, two are most common: ring bus and breaker-and-a-half (BAAH).

A ring bus configuration assumes one breaker for each line or transformer position; whereas, a BAAH configuration assumes one and a half breakers for every line or transformer configuration (e.g. 4 lines equates to 6 breakers); see Figure 3-1 for a diagram of each configuration.



**Figure 3-1 Substation Configurations**

A line position is defined as a transmission line entering or exiting and terminating at the substation. For one transmission line looping into a substation, it would require two line positions. A transformer position is equal to the number of transformers added. Each of these types of configurations is used at different voltages and number of lines in and out of the substation. Smaller substations typically assume a ring bus configuration, while larger substations use a BAAH configuration. Table 3-2 identifies the basic cost per line or transformer position and the associated multipliers. These costs include the breaker, switches, structures, and protection schemes associated with these configurations.

**Table 3-2 Line/Transformer Position Cost and Multipliers**

| EQUIPMENT                     | 230 KV SUBSTATION | 345 KV SUBSTATION | 500 KV SUBSTATION |
|-------------------------------|-------------------|-------------------|-------------------|
| Cost Per Line/XFMR Position   | \$1,442,000       | \$2,163,000       | \$2,884,000       |
| Ring Bus Multiplier           | 1                 | 1                 | 1                 |
| Breaker and a Half Multiplier | 1.5               | 1.5               | 1.5               |

If an existing substation is expanded, in the case of connecting two existing substations with a new transmission line, no incremental base substation costs are incurred.

### 3.3 TRANSFORMERS

Many transmission lines connect to substations that serve load areas, typically at a lower voltage level than the bulk transmission system. To do so, transformers are needed to decrease the voltage and deliver electricity to load centers. Transformers vary by voltage, as well as by current carrying

# Attachment B

capability. Transformers can vary in cost substantially based on variables such as copper commodity prices, as well as cost of freight; however, the costs considered and vetted by the WECC stakeholders are typical in the industry. The costs considered include foundation and oil containment for the transformer.

Table 3-3 below identifies the capital costs associated with each voltage class in a cost per megavolt ampere (MVA), which is dependent on the amount of current carrying capability necessary to deliver from the high voltage side to the low voltage side of the transformer.

**Table 3-3 Transformer Capital Costs**

| TRANSFORMER COST (\$/MVA) | 230 KV SUBSTATION | 345 KV SUBSTATION | 500 KV SUBSTATION |
|---------------------------|-------------------|-------------------|-------------------|
| 115/230 kV XFMR           | \$7,000           | -                 | -                 |
| 115/345 kV XFMR           | -                 | \$10,000          | -                 |
| 115/500 kV XFMR           | -                 | -                 | \$10,000          |
| 138/230 kV XFMR           | \$7,000           | -                 | -                 |
| 138/345 kV XFMR           | -                 | \$10,000          | -                 |
| 138/500 kV XFMR           | -                 | -                 | \$10,000          |
| 230/345 kV XFMR           | -                 | \$10,000          | -                 |
| 230/500 kV XFMR           | \$11,000          | -                 | \$11,000          |
| 345/500 kV XFMR           | -                 | \$13,000          | \$13,000          |

### 3.4 REACTIVE COMPONENTS

An ideal transmission system does not require any reactive support; however, this is rarely the case. Many transmission networks are integrated in a manner that supports voltage dips across the network; however, some weaker systems may require additional reactive power support to maintain grid reliability. The amount of reactive support, and the speed with which the support needs to be transferred to the grid, will determine what type of reactive component is required at the substation.

Black & Veatch identified three key reactive components commonly used for transmission level grid support. Each piece of equipment has its own level of complexity, size, and cost.

- Shunt Reactor
- Series Capacitor
- Static VAr Compensator (SVC)

Attachment C

BULLETIN 1724E-200  
**DESIGN MANUAL FOR  
HIGH VOLTAGE TRANSMISSION LINES**

U.S. DEPARTMENT OF AGRICULTURE  
RURAL UTILITIES SERVICE  
ELECTRIC STAFF DIVISION

Revised May 2009

TABLE D-2: MVA LIMITS

|           |               | MVA LIMIT FOR 212 DEGREE F OPERATION AT THE INDICATED VOLTAGE<br>(S = Summer; W = Winter) |     |       |     |       |     |        |     |        |     |        |     |        |     |
|-----------|---------------|---|-----|-------|-----|-------|-----|--------|-----|--------|-----|--------|-----|--------|-----|
| CONDUCTOR |               | 34.5 kV   |     | 46 kV |     | 69 kV |     | 115 kV |     | 138 kV |     | 161 kV |     | 230 kV |     |
| NAME      | SIZE & STRAND | S   | W   | S     | W   | S     | W   | S      | W   | S      | W   | S      | W   | S      | W   |
| RAVEN     | 1/0 6/1       | 15  | 20  | 20    | 26  | 31    | 39  | 51     | 66  | 61     | 79  | 72     | 92  | 102    | 132 |
| QUAIL     | 2/0 6/1       | 18  | 23  | 23    | 30  | 35    | 45  | 59     | 75  | 70     | 91  | 82     | 106 | 117    | 151 |
| PIGEON    | 3/0 6/1       | 20  | 26  | 27    | 35  | 40    | 52  | 67     | 87  | 81     | 104 | 94     | 121 | 134    | 173 |
| PENGUIN   | 4/0 6/1       | 23  | 30  | 31    | 40  | 46    | 59  | 77     | 99  | 92     | 119 | 108    | 139 | 154    | 198 |
| WAXWING   | 266.8 18/1    | 29  | 37  | 38    | 49  | 57    | 74  | 95     | 123 | 114    | 147 | 133    | 172 | 190    | 245 |
| PARTRIDGE | 266.8 26/7    | 29  | 37  | 39    | 50  | 58    | 75  | 96     | 124 | 116    | 149 | 135    | 174 | 193    | 249 |
| MERLIN    | 336.4 18/1    | 33  | 43  | 44    | 57  | 66    | 85  | 110    | 142 | 132    | 171 | 155    | 199 | 221    | 285 |
| LINNET    | 336.4 26/7    | 34  | 43  | 45    | 58  | 67    | 87  | 112    | 144 | 134    | 173 | 156    | 202 | 224    | 288 |
| ORIOLE    | 397.5 30/7    | 34  | 44  | 45    | 58  | 68    | 87  | 113    | 145 | 135    | 174 | 158    | 203 | 225    | 290 |
| CHICKADEE | 397.5 18/1    | 37  | 48  | 37    | 48  | 74    | 95  | 123    | 158 | 147    | 190 | 172    | 222 | 246    | 317 |
| IBIS      | 397.5 26/7    | 37  | 48  | 37    | 48  | 75    | 96  | 124    | 160 | 149    | 193 | 174    | 225 | 249    | 321 |
| LARK      | 397.5 30/7    | 38  | 48  | 38    | 48  | 75    | 97  | 125    | 162 | 150    | 194 | 175    | 226 | 250    | 323 |
| PELICAN   | 477. 18/1     | 41  | 53  | 41    | 53  | 83    | 107 | 138    | 178 | 165    | 214 | 193    | 249 | 276    | 356 |
| FLICKER   | 477. 24/7     | 42  | 54  | 42    | 54  | 83    | 108 | 139    | 180 | 167    | 216 | 195    | 252 | 278    | 359 |
| HAWK      | 477. 26/7     | 42  | 54  | 42    | 54  | 84    | 108 | 140    | 180 | 168    | 216 | 196    | 253 | 279    | 361 |
| HEN       | 477. 30/7     | 42  | 55  | 42    | 55  | 84    | 109 | 141    | 182 | 169    | 218 | 197    | 254 | 281    | 364 |
| OSPREY    | 556.5 18/1    | 46  | 59  | 46    | 59  | 91    | 118 | 152    | 196 | 182    | 236 | 213    | 275 | 304    | 393 |
| PARAKEET  | 556.5 24/7    | 46  | 60  | 46    | 60  | 92    | 119 | 154    | 198 | 184    | 238 | 215    | 278 | 307    | 397 |
| DOVE      | 556.5 26/7    | 46  | 60  | 46    | 60  | 93    | 120 | 154    | 199 | 185    | 239 | 216    | 279 | 308    | 398 |
| EAGLE     | 556.5 30/7    | 47  | 60  | 47    | 60  | 93    | 120 | 155    | 201 | 186    | 241 | 217    | 281 | 310    | 401 |
| KINGBIRD  | 636. 18/1     | 49  | 63  | 49    | 63  | 97    | 126 | 162    | 210 | 195    | 252 | 227    | 294 | 324    | 419 |
| ROOK      | 636. 24/7     | 50  | 65  | 50    | 65  | 100   | 130 | 167    | 216 | 201    | 259 | 234    | 303 | 334    | 432 |
| GOSBEAK   | 636. 26/7     | 50  | 65  | 50    | 65  | 101   | 130 | 168    | 217 | 201    | 260 | 235    | 304 | 336    | 434 |
| EGRET     | 636. 30/19    | 51  | 66  | 51    | 66  | 101   | 131 | 169    | 219 | 203    | 262 | 237    | 306 | 338    | 437 |
| CUCKOO    | 795. 24/7     | 58  | 75  | 58    | 75  | 116   | 150 | 193    | 249 | 231    | 299 | 270    | 349 | 385    | 498 |
| DRAKE     | 795. 26/7     | 58  | 75  | 58    | 75  | 116   | 150 | 194    | 250 | 232    | 301 | 271    | 351 | 387    | 501 |
| MALLARD   | 795. 30/19    | 59  | 76  | 59    | 76  | 117   | 151 | 195    | 252 | 234    | 303 | 273    | 353 | 390    | 505 |
| TERN      | 795. 45/7     | 57  | 74  | 57    | 74  | 115   | 148 | 191    | 247 | 229    | 296 | 267    | 346 | 382    | 494 |
| CONDOR    | 795. 54/7     | 58  | 75  | 58    | 75  | 116   | 150 | 193    | 249 | 231    | 299 | 270    | 349 | 385    | 498 |
| RAIL      | 954. 45/7     | 64  | 83  | 64    | 83  | 129   | 166 | 214    | 277 | 257    | 333 | 300    | 388 | 429    | 555 |
| CARDINAL  | 954. 54/7     | 65  | 84  | 65    | 84  | 130   | 168 | 216    | 280 | 260    | 336 | 303    | 392 | 433    | 560 |
| BUNTING   | 1192.5 45/7   | 74  | 96  | 74    | 96  | 148   | 192 | 247    | 319 | 296    | 383 | 345    | 447 | 493    | 639 |
| GRACKLE   | 1192.5 54/19  | 76  | 98  | 76    | 98  | 151   | 196 | 252    | 326 | 302    | 391 | 352    | 457 | 504    | 652 |
| BITTERN   | 1272. 45/7    | 77  | 100 | 77    | 100 | 154   | 200 | 257    | 333 | 308    | 399 | 359    | 466 | 514    | 665 |
| PHEASANT  | 1272. 54/19   | 79  | 102 | 79    | 102 | 157   | 204 | 262    | 340 | 315    | 408 | 367    | 476 | 525    | 680 |
| LAPWING   | 1590. 45/7    | 88  | 115 | 88    | 115 | 177   | 229 | 295    | 382 | 354    | 459 | 413    | 535 | 590    | 764 |
| FALCON    | 1590. 54/19   | 90  | 117 | 90    | 117 | 181   | 235 | 302    | 391 | 362    | 469 | 422    | 548 | 603    | 782 |
| CHUKAR    | 1780. 84/19   | 96  | 125 | 96    | 125 | 192   | 249 | 320    | 415 | 384    | 498 | 448    | 581 | 640    | 831 |
| BLUEBIRD  | 2156 84/19    | 108   | 140 | 108   | 140 | 215   | 280 | 359    | 466 | 431    | 559 | 503    | 653 | 718    | 932 |



SIERRA NEVADA REGION

# Sacramento Area Voltage Support

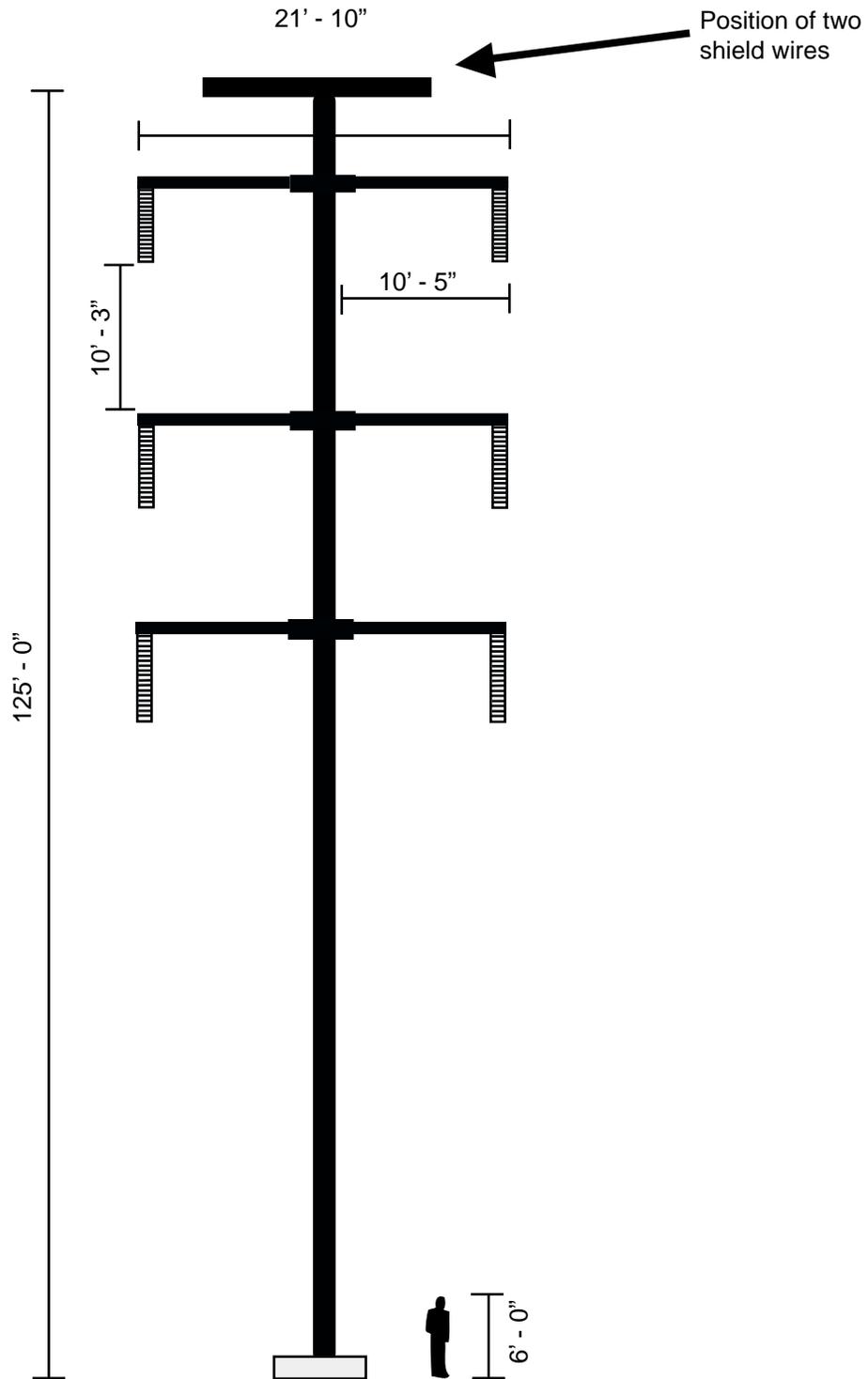
DRAFT  
SUPPLEMENTAL  
ENVIRONMENTAL  
IMPACT STATEMENT  
AND  
ENVIRONMENTAL  
IMPACT REPORT

Supplying Energy



Preserving Reliability

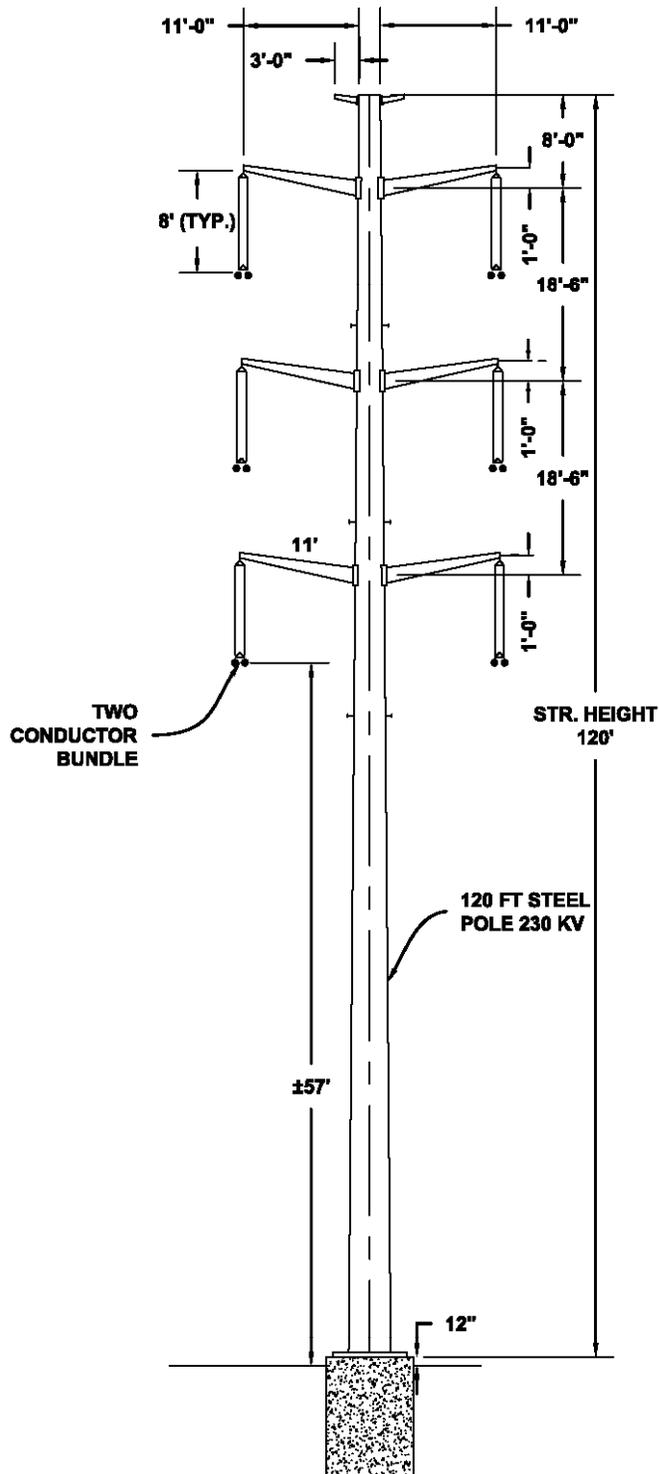
# 230-kV Steel Monopole



(Dimensions are typical)

**SACRAMENTO AREA  
VOLTAGE SUPPORT  
Supplemental EIS and EIR**

Figure 3.1-13  
230-kV Steel Pole  
Transmission Structure



**Figure 2.1-4**  
**230-kV Steel Monopole**



1600 SW Western Blvd, Suite 100  
Corvallis, OR 97333  
(541) 766-4634

July 29, 2013

Brison R. Ellinghaus  
Project Development Manager  
Soitec Solar, Inc.  
4250 Executive Square, Ste. 770  
La Jolla, CA 92037

Brison.Ellinghaus@Soitec.com

**Subject: Transmission Line Cost Estimates for the Soitec Facility at  
Tierra Del Sol**

Mr. Ellinghaus,

This letter lists the results for several transmission line cost estimates that we performed pursuant to our July 9 proposed scope of work and your July 24 authorization.

**Understanding of the Project and the Use of these Estimates:** Soitec requires engineering cost estimates for the Tierra del Sol project's transmission line located near Boulevard, CA. The project is intended to utilize a 138-kV transmission line, but it is yet to be determined whether the 138-kV line will be overhead, underground, or a combination thereof.

The following estimates are completed without the benefit of design of any type and thus must be considered to be Order-of-Magnitude cost/mile estimates based only on TriAxis experience and judgment. In order to develop per-mile costs, TriAxis has assumed a basic 5-mile-length and divided the cost by 5.

**Order-of-Magnitude Cost Estimates:**

- a. Per-Mile construction cost estimate of a Single-Circuit 138-kV Overhead transmission line using guyed steel poles and designed for a 60-MW solar project: **\$559,000/mile**
- b. Per-Mile construction cost estimate of a 138-kV Underground transmission circuit for a 60-MW solar project: **\$2,000,000/mile**
- c. Discussion of the implications/ concerns with direct-bury method of installing an underground transmission line as compared with installing cables within duct-banks:

Underground transmission cable systems of 69 kV and higher operate with insulation voltage stresses of about two times the voltage stress of cables rated 35-kV and lower. This is done to allow practical cable weights, diameters, cost, and packaging. This cable design standard requires a higher level of insulation purity and special attention to limiting

exposure to water vapor both during manufacture and in operation. Water vapor causes long-term degradation of the insulation.

Because the transmission cable cost is so high, conduit systems are seen throughout the industry as a means to protect the investment. Compared to the direct-bury method, duct banks create a cable environment that is drier and more mechanically protected from accidental dig-ins or vandalism. Conduits also allow the removal and replacement of a faulted cable.

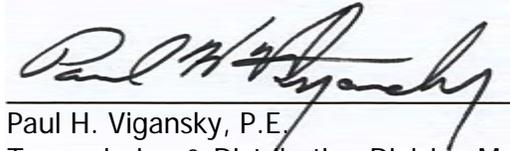
Transmission splices are not as water-vapor-tight as the cables, and are consequently never directly buried. If a direct-buried transmission cable fails for any reason, a new splice vault must be installed at the fault location to repair it.

Where transmission cable must be directly buried, utilities protect the cable with removable sidewalk-size concrete slabs placed 12 inches, or so, below grade and 12 inches above the cables.

If acceptable, I believe that this submittal completes our mutually agreed scope of work. If you require our backup estimate spreadsheets for review, or if you need further discussion, please contact Gordon Ormsby at [gormsby@triaxiseng.com](mailto:gormsby@triaxiseng.com). Gordon is retired, but generally available to assist on this type of project. Also, call me if you have any questions.

Sincerely,

TriAxis Engineering, Inc.

A handwritten signature in black ink, appearing to read "Paul H. Vigansky", is written over a light blue rectangular background. The signature is cursive and somewhat stylized.

Paul H. Vigansky, P.E.  
Transmission & Distribution Division Manager

---

**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Tuesday, November 04, 2014 11:56 PM  
**To:** Will Metz; jaheys@fs.fed.us; Joan Friedlander; Bjorn Fredrickson; CNFMSUP  
**Cc:** Nick Ervin; Debbie H; Molly Bigger  
**Subject:** RE: SDG&E Master Permit -- DEIF/DEIS  
**Attachments:** msupDEIScmt.docx

Dear CNF , CPUC, SDG&E And DUDEK,  
Please note attached comments for the SDG&E Master Permit -- DEIF/DEIS

Thank you!  
Sincerely  
Cindy Buxton  
Chair Forest Committee, San Diego Sierra Club

*1964 Civil Rights 50 ~ Wilderness 50 ~ Beatles 50 Yea yea yea!*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

.....  
.....

Dear USFS, CPUC, SDG&E, DUDEK, and colleagues:

The Forest Committee of Sierra Club San Diego has followed the path of this project intently if not passionately at times, as it has progressed over the last four years. We were one of the first handful of commenters on the original version that was released but never finalized several years ago. Since then SDG&E came out with their own version of a plan three years ago that had many changes from the original. Additionally they had laminated copies of their intentions placed in many locations all over the forest and private properties announcing their intentions:



This week the US Forest Supervisor of the Cleveland National Forest released his final record of decision, concluding many years in the making, of the supplemental EIS (environmental impact statement) for the Cleveland Land Management Planning. Of interest is that it finalized the recommended wilderness status for the proposed Eagle Peak Wilderness which includes formerly public defined units we referred to as Eagle Peak, Sill Hill, Cedar Gorge, The San Diego River Gorge, and “NoName”-- which is effectively the lands to the south of Eagle Peak in the El Capitan Mesa and north of the Viejas Reservation. Even though the placement of recommended wilderness status upon these lands does not affect current permits, the permit for SDG&E has expired. This new permit addressed herein would affect what types of activities are allowed in the Recommended Wilderness areas in new projects.

Subsequently SDG&E and the US Forest Service has announced the preferred alternative that removes the TL626 (Transmission Line number 626) from service. The existing 12kV would nevertheless remain in operation and its infrastructure would be replaced per the guidelines in the MSUP proposal.

We support the USFS preferred option in reference to the TL626 and the Eagle Peak Area except where we make additional requests and comments below.

We wish to commend the USFS and SDG&E for coming together with us for our local San Diego Wild Heritage, by entering into a courageous and unprecedented option in favor of preserving outstanding remaining wild lands in the Eagle Peak, San Diego River Gorge, Cedar Gorge, NoName, and Sill Hill (Cuyamaca region) for perpetuity. We hope this will be an indication of stronger collaboration for us all in the future. We wish to thank all for the diligence in coming to terms to preserve San Diego County's rarest and most strategically threaten areas; to be set aside for the enjoyment and preservation of these ecologies for all of time.

Additionally we cannot thank enough the tireless efforts of our public stewards in the US Forest Service, their tenacity, and ability to think "out of the box" in putting this plan together.

Nevertheless there are still some serious issues we wish to address, requests we will make and suggestions we wish to state for the record. We will be using input from our teammates and colleagues in this documents. It is possible you will see some of the same information in other comment letters. I will identify the source where it is permissible to do so. Some people along the way do not want to be publically identified and we will respect that where applicable. We believe this information is truthful and collected with integrity for the purposes stated. Hopefully some of these issues became moot with the introduction of the preferred alternative for the Eagle Peak area but we will put them here in the record in the meantime.

The most overreaching concern and recommendation is that the above ground upgrades are still a fire hazard and still very harmful to the ecologies as well as adding to the blight and industrialization of areas of the county that are much loved for their sweeping natural landscapes and rural cultures. We remain certain that most of this upgraded infrastructure would better serve the community by undergrounding. Where this is not logistically and immediately possible we believe there needs to be a short range plan with schedule for undergrounding ALL lines in our fire-volatile backcountry as soon as possible even if necessitated to be done in segments.

We will elaborate as follows.

Our Forest Committee members have attained from SDG&E, CPUC, and DUDEK several data items and used these to run some hypothetical calculations. We have determined that in a normally structured bond issue with the remaining 100 miles of infrastructure after the removal of the TL626, the cost per SDG&E account would be about 35 cents a month or less than 5 dollars a year to underground the entire project. We believe the residences of San Diego County having experienced the two biggest fires in California in addition to the community love of the backcountry would strongly support such a minimal charge to curtail the threat of fires and other serious impacts from switching out the infrastructure to the more robust version in this DEIS.

Please provide an accounting of your risk assessment costs for the term of this permit.

Please explain if the costs for undergrounding include additional pads for profits. Does SDG&E expect a higher return for staying above ground than by going below ground? Please provide the numbers to substantiate both figures.

Isn't it true that the 12kV lines can run underground for up to 1400 feet without a vault? Assuming this is true why would you not be undergrounding as much of the 12kV lines as possible in these high wind/ high ecologically sensitive areas?

Isn't it true that San Diegans have already been paying for the undergrounding of all lines in their monthly bills for many years? Why is that money not being applied to these?

Please note and reference herein the following document found online:

FEASIBILITY OF UNDERGROUNDING  
A PORTION OF THE  
MIGUEL-MISSION 230kV#2 TRANSMISSION LINE PROJECT  
PROPOSED BY SAN DIEGO GAS & ELECTRIC COMPANY, dated February 26, 2004,

At the following web site:

[http://www.cpuc.ca.gov/Environment/info/aspen/miguel\\_mission/deir/text/Appx%204%20pt1.pdf](http://www.cpuc.ca.gov/Environment/info/aspen/miguel_mission/deir/text/Appx%204%20pt1.pdf)

This document describes the cost of undergrounding a 3.5 mile section of 230kV transmission line near Jamacha Valley in 2004. The cost for a 230 line that would take the place of BOTH a 69kV and a 138kV was \$12,310,000.00

At that rate the cost of a 230kV for 1 mile would be 3,517,142.86 and hence the cost of undergrounding the remaining 100 miles of this project would be about 350 million dollars. SDG&E has suggested that the cost of this project 10 years later is 450 million dollars for a combination of 12k and 69kV ABOVE GROUND. These are two smaller power lines above ground. Granted this is ten years later but this seems to represent a considerable discrepancy of costs. Please provide an accounting of the cost of undergrounding and explain why this is not being considered since the apparent costs per this study by CAI would indicate that the cost of undergrounding is well within the same range as above ground. Could it be that the cost of steel poles could be off set and underground almost as well?

What is the average cost of a 69kV steel pole?

What is the average cost of a 12kV steel pole?

What is the average cost of a 69kV wooden pole?

What is the average cost of a 12kV wooden pole?

What is the price per foot of the new one inch conductor and the cost of the current ½ inch conductor?

Additionally can you guarantee that these above ground are as safe as undergrounding over the course of the live of this permit?

Do you have a standard for juxtaposing safety to the cost of these lines?, and if so please elaborate.

WE cannot imagine nor support that the community will accept any disparity in human safety in favor of costs of this line. What is your margin of error for human safety and how is it calculated?

Please describe fully the financial advantages of going above ground. What incentives have been offered to SDG&E and its vendors as well as the USFS and by whom for choosing infrastructure for an above ground

format? Please list all arrangements that were offered by all vendors that were used to demonstrate a cost savings for going with a particular vendor on this line. Is there anyone in the USFS or in SDG&E, SEMPRA, or The CPUC or any of us commenters or environmental organizations that would be financially or politically advantaged by going above ground over undergrounding?

Was there anyone who was offered incentives for supporting a green energy infrastructure by any vendors, including within the environmental community?

Why is there so much interface with only a few wind and solar companies when there is a myriad of technologies offering promise to stem climate change?

What is the complete interface and obligation of this project as well as SDG&E and the USFS to the national effort to stem global warming?

Given the data presented we are firmly of the opinion that this line needs to be fully underground in the back country except where it can be fully demonstrated that it would be harmful to the ecology or human safety to do so or the terrain is prohibitive to all available technologies. We will likely object in the event that more attention is not placed on this major and pivotal issue of undergrounding most of this project.

The weather stations in the Eagle Peak area, for example the Sill Hill weather station has officially recorded wind speeds of 101 miles per hour. Your documentation does not have this indicated. Please update the documentation to reflect this and all impacts and decisions in the document that would be affected by this speed.

Please note the following screen print of the maximum wind speed at the Sill Hill weather station:



89%

10:15 AM

www.sdgeweather.com/station.php?s:



ImpactWeather

All Stations Radio Satellite Rainfall Station Map Enhanced Site

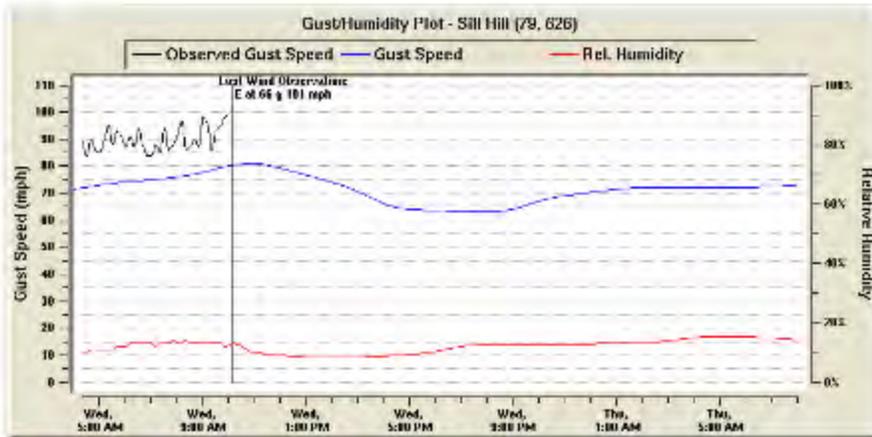
Observations Wind Gusts Identity Temperature

Forecasts Wind Gusts Humidity Temperature

Sill Hill (79, 020) Station Data (Station Map)

Red Flag Warning: No  
Fire Weather Zone: 258  
SDGE Region: Mountain Empire  
Lat/Lon: 32.954/-116.643

Observations



| Time (PDT)   | Wind Spd/Gust | Temp | Rel | Feet Above |
|--------------|---------------|------|-----|------------|
| 4/30 10:10am | E 66 G 101    | 50°  | 12% | -          |
| 4/30 9:50am  | E 67 G 98     | 50°  | 12% | -          |
| 4/30 9:40am  | E 67 G 93     | 50°  | 13% | -          |
| 4/30 9:30am  | E 66 G 93     | 50°  | 12% | -          |
| 4/30 9:20am  | E 61 G 86     | 50°  | 13% | -          |
| 4/30 9:10am  | E 65 G 90     | 50°  | 13% | -          |
| 4/30 9:00am  | E 64 G 90     | 50°  | 12% | -          |
| 4/30 8:50am  | E 65 G 87     | 50°  | 13% | -          |
| 4/30 8:40am  | E 66 G 90     | 50°  | 13% | -          |
| 4/30 8:30am  | E 66 G 87     | 50°  | 13% | -          |
| 4/30 8:20am  | E 63 G 86     | 50°  | 14% | -          |
| 4/30 8:10am  | E 67 G 87     | 50°  | 13% | -          |
| 4/30 8:00am  | E 66 G 91     | 50°  | 13% | -          |
| 4/30 7:50am  | E 65 G 88     | 50°  | 14% | -          |
| 4/30 7:40am  | E 63 G 86     | 50°  | 13% | -          |
| 4/30 7:30am  | E 66 G 94     | 50°  | 13% | -          |
| 4/30 7:20am  | E 66 G 83     | 50°  | 12% | -          |
| 4/30 7:10am  | E 63 G 88     | 60°  | 12% | -          |
| 4/30 7:00am  | E 62 G 84     | 60°  | 13% | -          |
| 4/30 6:50am  | E 67 G 84     | 60°  | 13% | -          |
| 4/30 6:40am  | E 64 G 88     | 50°  | 13% | -          |
| 4/30 6:30am  | E 67 G 84     | 60°  | 13% | -          |
| 4/30 6:20am  | E 64 G 87     | 60°  | 13% | -          |
| 4/30 6:10am  | E 64 G 91     | 60°  | 12% | -          |
| 4/30 6:00am  | E 65 G 87     | 60°  | 12% | -          |
| 4/30 5:50am  | E 67 G 91     | 61°  | 12% | -          |
| 4/30 5:40am  | E 66 G 93     | 61°  | 12% | -          |
| 4/30 5:30am  | E 64 G 88     | 61°  | 13% | -          |
| 4/30 5:20am  | E 66 G 92     | 61°  | 13% | -          |
| 4/30 5:10am  | E 65 G 89     | 61°  | 11% | -          |
| 4/30 5:00am  | E 61 G 85     | 61°  | 13% | -          |
| 4/30 4:50am  | E 62 G 80     | 61°  | 13% | -          |
| 4/30 4:40am  | E 66 G 90     | 62°  | 13% | -          |
| 4/30 4:30am  | E 67 G 84     | 62°  | 10% | -          |
| 4/30 4:20am  | E 61 G 82     | 63°  | 10% | -          |
| 4/30 4:10am  | E 67 G 80     | 63°  | 10% | -          |

How do you know that you have the most robust readings? For example, if the highest drop from Cuyamaca for example were to be accelerated by the funneling in Boulder Creek Gorge isn't it true that the wind speed could actually be even higher than 101 across Boulder Creek Gorge?

This being so why did you remove the weather gage there?

According to your electrical engineering staff, as well as the PDF provided by the vendor of the conductor that you propose to use to rewire for "fire hardening" this conductor optimizes and is scheduled to operate at 270 degrees Fahrenheit. Can you assure at this temperature and the high recorded wind speeds that grasses and other debris contacting the line won't catch fire? Will the temperature of the wire go higher? What is the maximum temperature? Are you still using the make and model wire that was published and described for the scoping and pre-scoping documentation? If not what are you using? If not please provide the documentation or an equitable link to this documentation specification. If the wire reaches the maximum temperature how will you assure it will not go higher? Is this regulated programmatically via computer? Have you tested this logic?

The reason that The Three Mile Island nuclear power plant failed, as the urban legend goes is because someone coded the logic similar to the following:

A:

if temperature is equal to X do alarm warning sequence.

B: go to A

Alarm Warning sequence:

Initiate cooling sequence

Sound alarm.

Initiate radiation detection and containment sequence.

Print/display log

Go to A

Unfortunately the temperature then went higher than X and the alarm warning sequence was no longer executed.

The logic should have read:

A:

If temperature is equal *or greater to X* do alarm sequence

B: go to A

Alarm Warning sequence:

Initiate cooling sequence

Sound alarm.

Initiate radiation detection and containment sequence.

Print/display log

Go to A

Please ensure that all possible logic for this conductor is tested before relying on it. This would include temperature, wind speed, amperage, voltage, wattage, resistance, etc.

SDG&E has claimed that the suggested materials and arrangement for the new line can withstand 85 miles per hour.

Is this true for the 12kV lines as well?

If not what are the 12kV lines rated for?

When the 12kV lines are co-located with 69kV lines and the 12 lines are exposed to winds in excess of their rating and are shut down, do you shut off the 69kV lines as well? Wouldn't the wind speed affect both?

Since the top wind speed is 101 mph and the 69kV lines are rated at 85 mph, how can you assure us that the 12kV lines are capable of not failing in these hurricane force category 2 winds?

The environmental consequences of too frequent fires result in type conversion, soils erosion, and considerable acceleration of natural resources towards dire conditions leading to climate change. Additionally the Sierra Club believes that even the loss of one life would make the cost of undergrounding the obvious alternative. NEPA and CEQA both mandate that where environmental integrity is better served by an alternative even one that costs more, it is the mandated alternative.

Again we cannot thank you enough for making the historic move to protect the future and ecology of Cedar Gorge. The TL626 access road into and across Cedar Creek has been highly problematic to maintain without dumping hundreds of cubic yards of silt into the stream every time it is maintenance as we have observed as much as four times in one year, more commonly 1-2 times a year.

We have sent in photos and video documenting this runoff that can create ruts over a foot deep after one major storm. We have sent in % grade measurements in excess of 40% along this access road. The documentation says that % grade will not exceed 25 % or access roads will be removed. Consequently, removing it from service is the highly responsible thing to do. However the 12kV that was co-located under the first 10 miles of the TL626, so far is still scheduled to run across Boulder Creek to the north side of the McCoy and Green Ranches before terminating.

WE have sent in very comparable data for Boulder Creek, to Cedar Creek, the same sort of information upon which Cedar Gorge is now protected. There are some minor differences between these two streams ecologically, but they are both unique, wild, rugged and capable of sustaining trout populations through breeding. There are ongoing trout studies in Boulder Creek only curtailed by the excessive drought.

We have sent in data collected of considerable % grades on the Boulder Creek canyon in excess of 40% grade. WE have sent in data showing deep ruts in excess of a foot deep after only one rain fall subsequent to grading. Since the 12kV is still operational how will you be maintaining the last mile in a way that will not continue to put silt into Boulder Creek and be safe from fires and accessible to fire fighters?

There are only two properties on the north side of Boulder Creek. Currently there is only one residence there. Under the county plan the maximum possible north of Boulder Creek as it currently stands would be eight 40 acre parcels and possibly 4 if the county changes the subdivision to 80 acres per parcel. Additionally if the owners were to choose to subdivide there has been considerable interest expressed by conservation organizations to broker the preservation of these two properties for perpetuity as much as possible if the option is ever available. Therefore the likelihood of all eight potential units acquiring permitting and electricity is not great. We estimate that that likelihood for residential subdividing is closer to four under the current county arrangement.

Would it not be more prudent to provide for the energy needs of these properties as they are developed with ample roof top solar? Currently that is one residence. The Gibbs property north of Cedar Gorge is being provided with 8kW of solar power, enough to take them comfortably off the grid with matching battery backup.

The property owners at the two parcels at the McCoy and Green Ranches have been very concerned about their future ability to have energy there. Can you clarify and verify for all the remaining current areas serviced by SDG&E on this 12kV, the requirement for SDG&E to see to this need one way or the other?

Given that, can you establish, considering the environmental impact, risk management due to fire, risk management to replace the infrastructure in the event of a fire, the risk to human safety, and impacts to rare ecologies, please establish enough information for an informed decision as to the pros and cons of agreeing to provide roof top solar to the McCoy and Green Ranches as needed; in lieu of maintaining this last mile of 12kv across one of the roughest and most sensitive streams in the San Diego River greater watershed?

While having grid access is often seen as a component of the land value we believe we are fast approaching an era when being off of the grid will take the place in accelerating land values for privacy and scenic integrity values.

Additionally the 12kV broke under the duress of a fire in October of 2006 at mile 8 on Boulder Creek Road. Due to prompt reporting and quick response from the Descanso Fire team the fire was curtailed to less than five acres. However this was only three years after the Cedar Fire. If there had not been a Cedar Fire, given the prior 50 year chaparral there, this fire would have burned the entire area. This stretch of line is still in one of the windiest areas of the county. Since 12kV do not require vaulting but every 1400 feet, this line should be high priority for undergrounding on both sides of the Sill Hill weather station and along much of Boulder Creek Road.

The wonderful removal of TL626 cannot be understated. We are indeed grateful to SDG&E and the USFS for coordinating this miraculous preferred option. San Diegans as well as all who love the US Forest System will benefit in this measure in preservation for perpetuity. We do not take the gravity of this exceptional and progressive step forward lightly. However in doing so there were last minute mitigations that were not well disclosed in time for scoping by the parties they impact.

We have visited the three sites where this mitigation for the removal of TL626 could occur and photographed these areas. The update from wood to steel and 4x conductor, six miles of 69kV line from the Golden Acorn Casino, more precisely a small substation just immediately behind it on highway 80 to a substation in Boulevard was listed as the preferred alternative. This land was visited and photographed. It is sweepingly naturally raw and beautiful. It may not be the exceptional rare and primordial character such as the areas of Cedar Gorge being recommended for wilderness status; but preservation of the character of this region as well as the locals who have chosen this area as home, should be given considerable attention and respect.

The transmission line there runs largely in a straight line that parallels a recommended and listed scenic highway about 500 to 800 feet south. The poles are in 3 to 6 feet of chaparral with NO apparent buffering of vegetation. This is a tinderbox waiting for a place to happen. Please consider not only undergrounding but consolidating with the 12kV next to historic and scenic eligible highway 80 –ALL underground. There are rural homes not too far away. In a Santa Ana wind these homes would be easily consumed by a fire from downed lines or ryegrass blown into the wires.

Since the access road is straight and accessible this should afford an ideal circumstances for getting the line underground. Please put this line underground. It will save money and a myriad of expensive political and community, health, safety, and environmental issues if you do. Even at a broad level mere financial perspective, if this line were to be in the path of a fire it would not only burn its own infrastructure but potentially some of the most expensive concentration of energy infrastructure now under development in the county. This is not unheard of, in fact, over the course of 30-50 years it is practically a guarantee. The wind and solar farms stand an excellent chance of burning to the ground out there in the high chaparral, scraping the ground clean for the entire region would violate all of the federal environmental laws as well as the state mandated climate change laws. This can all be attenuated simply by undergrounding. WE cannot fathom that an insurer of these projects would not be requiring it. The additional construction projects in the area will further induce the presence of nonnative grasses that will be blown into the conductors adding to the concern that the lines can start a fire.

At the other end of the county, state highways 76, S6, and S7 stand as the consummate bread and butter visitor destination of the county. The world class Palomar Space Observatory stands at the top of Palomar Mountain. This loop was photographed recently as one of the most obvious traditional scenic highway loops in the county.

To illustrate the world class popularity of Palomar Mountain, when I was a teenager on the eastern seaboard 3000 miles from here, I knew of only a couple of things in San Diego: I knew the San Diego Zoo, followed closely by Joan Embury, Sea World, and then I knew about the telescope on Palomar Mountain.

### THIS IS PALOMAR MOUNTAIN!

This is a world class, world renowned destination. To punctuate the national visibility of this mountain I can only reiterate, I, a “pip-squeak” pre-teenager like myself as far from California as possible, even knew where this was even at a young age. There should not be any hesitation about undergrounding power lines in this region. Clearly the Native Americans in the La Jolla Reservation have acquired this entitlement for the potential future casino there. Why can this not be extended through the USFS and few inholdings there? I drove this just yesterday and a few times recently to review. I could not tell where US Forest, local inholding, or reservation, or country club began or ended. The contiguous scenic unspoiled character of the land is maintained throughout.

Our committee requested that the USFS consider this highway for scenic highway status several months ago. It was admittedly short notice as the Caltrans coordinator was out of town for several weeks. We have revisited this issue and restudied it. We know that the USFS has had their budgets and employees cut by what seems like two thirds since I first moved here 25 years ago. I sympathize and I hold you out as the wonderful stewards that have endured a tough journey with us the last several years. We are proud to have had you there as this process has matured and look forward to times when we can partner on more “Forest Centric” volunteering over the political projects that have consumed seven years of our preferred relationship there.

Nevertheless in revisiting this issue we will have to beg to differ, on a few points that we had thought prior would be at issue. As I drove this loop again two days ago, I remind you that the entire character of this loop was as indicative of scenic highway as could reasonably be expected anywhere in our entire country. I mention many times in the video I took that the character of that ride was easily reminiscent of the Blue Ridge Parkway back home, one of the most visible and world renowned scenic integrity models for the Forest Service manual. Our forest stewards have maintained the beauty of the Palomar landscape exceptionally. We have not seen the size and caliber of a coniferous forest on Middle and Cuyamaca since the cedar fire. Hence for many miles that ecosystem exists solely on Palomar. It is the traditional conifer sought after punctuation tourist, ecologist “bread and butter” “forest” country wide. We should not risk nor marginalize the first square centimeter of it. It is truly the “bread and butter” tourist “deep-forest” drive of the county. I have no doubt that the USFS feels basically the same as I and little doubt that this love for the Palomar treasure is shared universally across San Diego County.

We LOVE Palomar. The qualifications for Scenic Status of this Mountain could serve as the perfect prototype. To complete scenic highway status, -- from having seen the papers for preparation and in talking to the Caltrans representative who is enamored with a passion for his work, and in driving the course again two days ago, what remains proverbially, is the form filled out, and the blue California poppy signs deployed, --and an authoritative request from the US Forest Supervisor to do so.

Please make the undergrounding from the Forest Boundary at least through the Indian Reservation and the S6 turnout a priority.

Additionally, please send formal request to Cal Trans initiating the final Scenic Highway process for Highway 76, S6 and S7. We stand ready to help anyway possible.

After giving this some thought and more research, realizing it was not likely that the USFS thought much differently; they like us are overwhelmed with the energy projects and stresses therein from the last seven years of them. Therefore we chose to research more, requesting opinion from an attorney about the peculiarly specific wording of the scenic highway law. For the USFS in the 1963 law it states very specifically in the US Forest lands, the state listed roads for scenic status identified in the original law, “these roads *SHALL* be managed as scenic highway status”. The wording apparently was not optional. The pressures we can only presume up the proverbial energy food chain can only be formidable; however, they are not indicative of the law.

The prior notion that this master permit is predecisional to the Scenic Highway directive is therefore false. To the contrary. The MSUP is predecisional to the Scenic Highway status by 51 years.

This highway whether by name or not, is identified as an eligible highway and continues to be in mint scenic managed condition since before 1963 as the national treasure it is. All three roads, in fact Highway 76 all the way to the ocean have been identified as eligible for decades. However from Lake Henshaw to S6 and S7 inclusive they are also bounded by the USFS “shall” clause. Additionally the CPUC incorporated the use of the Scenic Highway status in their own section of the law that says that any upgrades to transmission and distribution lines within 1000 feet of state highways in the USFS will go underground. Therefore we stand firm that these highways NOT be marginalized by a new permit now or ever, but they MUST mandate that SDG&E place all new work going through the forest underground, and done so, moreover, with considerable care. We would be sorely remiss in allowing anything to become of our national heritage on Palomar Mountain. The law clearly supports the US Forest management in doing so and prohibits unlawful pressure to the contrary.

Therefore, please review the options for the transmission and distribution lines on Palomar Mountain in accordance with these scenic highway standards and place them ALL underground.

There are plenty of other reasons for doing so. AT&T has already undergrounded their line along highway 76. The ecology rare and outstanding necessitates preservations by all other environmental laws of the land as well. Additionally the back of Palomar comprises the Agua Tibia Wilderness which necessitates all manner of protection as part of the Federal Wilderness System.

I noted at one point in my recent trip to Palomar, San Diego County is a beautiful incredibly diverse natural phenomenon. While this should be a fact of perpetual celebration, in the last seven years this fact has been tarnished oddly, as if this was “a problem”.

***Consider this: We have made the fact that our county is drop dead gorgeous a “problem” by trying to locate enough energy wind and solar here for the proverbial entire south west?***

This “problem” will be replaced by a much worse one if we continue, and do not embrace what it is we have to celebrate: that could become that it is NOT an incredibly diverse and gorgeous natural phenomenon. How many parts of the country would bend over backwards to have this “problem”-or challenge? We need to realign our goals with the natural resources we have and our ethical obligation to ensure for all of time before it is too late. That squeeze is already all around us. In seven years we have allowed energy interests to look merely at a map from way out of town solely for the most wide open spaces on paper, and prey on them with energy projects long before the public has enough time to react. This is bitterly unfair to our community and at times way too questionably legal under NEPA and CEQA. The issue of scenic integrity is alive and very real and we must insist it is respected with equivalent authority to other NEPA/CEQA criteria.

Even now the Desert Renewable Energy Conservation Plan (DRECP) is threatening more encroachment on our Forests and beautiful unspoiled areas. It has been a never ending parade of projects and public commenting periods since 2006 and for some well before that.

*A child born at the time of the energy Act of 2005, the original USFS LMP, of parents who began following these issues in our backcountry from their beginning, is now entering the third grade, while their parents have had to keep one stressful eye on these projects their entire lives!*

. This is creating another serious issue for our communities' children. I did make comments on this issue and established standing on this issue for the Sunrise Powerlink. For this reason I think it is imperative that all connected actions, all cumulative actions as required by law need to be on the table; and furthermore, any subsequent expansions or new energy projects should be disallowed within the forest and footprint of this collective project. Subsequent to this project please disallow ANY new expansions in the forest for the duration of this permit. The impact to our local health and culture has reached its limit!

The law additionally prohibits piece-mealing or chopping into multiple sections one big project to make it appear smaller. If there is anything else that will connect with this plan please ensure it is rereleased with an addendum EIS in the immediate future, for comment- or as they say , forever hold your peace-and ours. The Desert energy act should be kept at bay from all influences impacting this permitting. Please disallow its further interface upon this permit once this public commenting is complete.

Donna Tisdale, spoke thoroughly of the progression of projects and cumulative impacts to our east county in the last seven years. She notes multiple concerns of inadequate disclosure. I would like to reference her letter about this project here. We would agree with all parts of it where we do not make statements directly to the contrary. The only issue that I could point out off hand that is somewhat tangent to their concerns, is as we have stated above, the undergrounding of TL626 is a small miracle for wilderness lands. WE agree fully that the subsequent updates to the line behind the Golden Acorn Casino into Boulevard is high priority to be undergrounded and the scenic integrity and rural culture of the Boulevard area should be respected and preserved. The focus on this region is at a maximum. It is time to call upon the integration of a multitude of technologies to stem climate change most especially in town roof top solar on a wide scale along with robust promise and acceleration of the recently announced and most promising fusion development and generation in the near future. This path should be given the first priority and no expansions in the forest should be allowed again until this option is thoroughly exhausted.

The time has come to take a stand upon what has become a flood upon one community juxtapose a county, and our community as a whole juxtapose the state as a whole where this massive energy development was proposed without the input of local planning groups by RETI, and the nation as a whole. The fact that many of our community leaders, decision makers and dignitaries do not have significant time off of the pavement to know just how vast our natural community is, into the rugged remote bottoms of Cedar or Boulder or the San Diego River gorges, or face to face crawling out of a thicket of manzanita and ceanothus, is not an excuse to ignore San Diego's "beauty problem" that wraps around a community of three million people. Indeed, however it is a challenge and a responsibility to see that the truth of beauty is communicated before it is further "resolved."

The sections of this project that impact the Barrett Lake, Lyons Valley to Carveacre have been most heartbreaking for this author. All of our insistence on undergrounding applies to this section as well. We would encourage as these are updated to review a new route under highway 94 and out of the McAlmond Canyon / Deerhorn Valley area. This should have significant priority. I see this as one of the most unfortunate consequences of the Sunrise Powerlink Alignment. Indeed, the current location of Sunrise, does not need to be permanent. Technology WILL prevail. This canyon is most unusual and contains incredible scenic and environmentally significant lands. It is one of the most serene, most unusual, unknown, and spectacular cubbies in our huge wardrobe of scenic "problems" in the county.

It is no secret that the Backcountry Land Trust and other Land brokers viewed this canyon as significant and were buying lands to preserve for perpetuity. The author visited the Deerhorn Valley, Barber Mountain Road/ Pats Canyon/ Dry Canyon areas a day before this writing. We weathered the Sunrise construction but there

should not be allowed further cumulative impacts to this valley. This line wraps around the full length of the Hauser Canyon Wilderness and the Pine Creek Wilderness.

The impacts to the Hauser Wilderness from the Sunrise construction is heart breaking. Please put a stop to the motorized traffic in Hauser Canyon IMMEDIATELY. SDG&E is accountable and responsible for ensuring their presence does not impact a Federally Protected Wilderness. Motorized and mechanized vehicles are prohibited by federal law and these are being encroached regularly since the Sunrise Proposal began.

Please explain the sudden disappearance of the Hauser Inventoried Roadless area. The Land Management Plan of 2005 was even pulled back and reissued to correct and correctly substantiate its existence, in that document. This was required by the order of 9<sup>th</sup> district law judge Patel to be reviewed in the land settlement. Instead it mysteriously disappeared without public notice or comment from all of the maps. I was given a sideways back-to-the-future like answer by a retired land planner for its demise. If this was actually a valid reason, for the same reason it could possibly be valid it is now negated by the terms that were provided in the 9<sup>th</sup> district court ruling on Inventoried Roadless Ares.

Are we to believe that Sunrise Powerlink had the authority to remove from existence an IRA? Clearly this was inappropriate and we would assert illegal and by all observations totally unnecessary. Please provide all documentation as to the removal of this designation. This is relevant because it is tied at the hip with Forest planning and permitting of energy and transmission permits in the Cleveland National Forest. The author has since reviewed this area from the perspective of the now built Sunrise Powerlink. Presuming that this was removed in response to the pressure for this behemoth transmission line I would argue that the persons that did this: ‘

A, had not been there or they would have known that the interface with the Hauser IRA was minimal, indeed for the most part over a half a mile away.

B. Did not read and understand the terms of the Inventoried Roadless Order. There is so much misunderstanding of the IRA status it is shocking. Neither Sunrise nor the needs of the US Border Patrol would have necessitated the removal of this status if one had reviewed the law. Return the IRA status to the South Hauser Rim per the description in the Land Management Plan. This description should be intact as the current record of decision from the 2006 LMP. It was not adjusted in the recent SEIS. This removal was not done inside of NEPA or FLMA. The IRA status should be returned to preclude further impacts to Hauser Canyon. This does NOT impact Border Patrol current usage nor the existence of the Sunrise Powerlink fully over a half a mile away throughout most of it.

Please notate and keep current: Inventoried Roadless *areas do not imply a path to wilderness* nor do they require one, nor does Wilderness necessitate IRA prior status. Wilderness is evaluated according to the Forest Land Management Act. The two are important but not at all the same.

There is nothing to indicate that designated IRA's have to have been by the Inventoried Roadless order of former president Bill Clinton. However there is much in both NEPA law and the final judgment of ninth district court handed down in 2010 on the lengthy (and most fascinating) IRA question to indicate that removing the IRA without public NEPA process and notification violated law and should be returned. Therefore the Hauser IRA that was removed for energy projects outside of the confines of the USFS permit, should be returned and it should not affect any existing operations in the area of the south Hauser rim or McAlmond Canyon with possibly some very small interface with Sunrise Powerlink at the east end of the canyon. Surely this did not preclude removing the entire designation?

I was able to determine these issues in a few hours while people who had not reviewed them, evaded data input and deliberated for weeks, making erroneous and sweeping decisions. We just demonstrated that we are capable of collaborating in unprecedented ways. This takes at minimum the ability to communicate with ground knowledge and look at life on life's terms. This determination was a minimal effort in the face of heart breaking loss. Fortunately for Hauser much of this error can still be recouped for the public domain with little more than the sweep of a pen.

One of the options for mitigating the TL626 is to run an additional 69kV circuit across Middle Mountain north of Japatul Valley Road beside the Sunrise Powerlink. WE examined this and discovered a far less impacting alternative:

As reviewed above, SDG&E has proposed two options to make up for the proposed removal of TL626. In regards to Option A, which involves new larger wires and metal poles on TL6931 from the Crestwood substation (behind the Golden Acorn Casino) to the Boulevard substation, this plan has been proposed and permits applied for in past years and is logical since the master plan fire hardening/upgrade only goes as far east along TL629 as the Crestwood substation. I feel certain TL6931 between Crestwood and Boulevard substations will eventually receive the metal poles and larger wires regardless of the future status of TL626.

In regards to Option B, SDG&E proposes construction of a 3 mile 69kVline from the Suncrest substation to Japatul Road to tie into TL625b, the Barrett-Loveland 69kVline. The SDG&E proposal is entirely on CNF lands across several huge mostly unspoiled canyons.

However, the same result can be accomplished much easier than a new 69kVline across rugged CNF lands. Bell Bluff Road, which links Japatul Valley Road to the Suncrest substation is almost entirely controlled and maintained by SDG&E. SDG&E secured easement and access along this road as part of the Sunrise Powerlink construction. A 69kV line (TL625) and a 12kVline is located at the entrance to Bell Bluff Road at Japatul Valley Road. (See image). When SDG&E build the Suncrest substation, they ran a 12kv line from the existing poles along Bell Bluff Road and Japatul Valley Road all the way to the Suncrest substation. SDG&E built the 12kv line under Bell Bluff Road. I have enclosed images of the vault access points along Bell Bluff Road. I also enclosed Google Earth images showing 12kV vaults along Bell Bluff Road. SDG&E can use the existing 12kv conduits and vaults under Bell Bluff Road for a 69kVtie in to TL625. If SDG&E cannot use the existing infrastructure under Bell Bluff Road, SDG&E can construct a new 69kv above or below ground along Bell Bluff Road to Japatul Valley Road that is shorter then Data Request no 6 (DR6) proposes and accomplishes the mission without new construction on CNF lands. I would also like to point out that since Bell Bluff Road is not a county road and SDG&E has access and easements to everything along this road, construction of a power line along this road does not have any of the issues construction elsewhere in San Diego County would have. Using Bell Bluff Road, SDG&E can tie the Suncrest substation to TL625 almost entirely on lands they already control.

As part of this comment, please perform an official data request procedure on construction of an underground 69kv power line to link Suncrest substation to TL625 along Bell Bluff Road.



TL625 and Sunrise intersection looking north towards Suncrest Substation. Proposed location of new power line in alternatives.

Current state 12kv underground on Bell Bluff Road





Bell Bluff road and Japatul. Image shows TL625.



Bell Bluff Road showing underground 12kV(white squares) headed towards Suncrest Substation.

In general we would add contrary to this exception just above, where the Cleveland is near highways and otherwise applicable, as long as the full infrastructure is being replaced, all right of ways (ROW) should be moved off of private lands as much as possible. The USFS is in far better position to manage these projects, interpret lengthy and unwieldy documentation, than to be putting this burden on private land owners. Additionally the USFS is equipped to identify environmental issues and mandated to do so with far stronger leverage that what can reasonably be expected of a private inholding. The narrow switching back and forth acre by acre from NEPA requirements to CEQA requirements is unwieldy and ultimately very expensive, inefficient, and at times not safe or environmentally prudent. Please consider small adjustments especially where the line can more closely follow public roads for access to keep contiguous management under one agency, in this case the USFS. These takes an enormous burden off of the local public, speeds up project management, and drastically reduces conflict. This would additionally support the accelerated urgency expressed in the state mandated considerations for addressing climate change.

What specifically are you doing to allow for future technological advances in energy and transmission that will improve scenic integrity, environmental integrity, and safety? In other words how is this plan planning for enough leverage in the future to be able to accommodate improved environmental interfaces when they arrive? This needs to be addressed in some detail and finessed. Otherwise we find ourselves committed to huge cages of 500kV lines for 50 years while fusion technology that fits in a pickup truck could remove these from our landscape well before the termination of a contract or permit. Granted the investors of utilities would like that continuity but given that these are public utilities are you not obligated to have some leverage and agility to adapt to public improvement?

The DEIS necessitated by NEPA, the National Environmental Policy Act, describes several other alternatives. This project falls right on the heels of a lengthy endeavor to establish the Cleveland US Forest Land Management Plan. The original plan challenged in court before the current management came to this forest had several portions that were defaulted or estimated and their criteria were never field checked. AS of this week this LMP has been finalized. The options for this permit were partially based upon bad or incomplete, or estimated data from the first LMP published in 2005 and 2006. The DEIS states that “so many” options were researched. In as much as the current preferred one is little short of a miracle and paves the way to an

incredibly improved chapter for all of us in these projects, while keeping this in mind, we must point out that there are serious issues with the other options. One option put a Right of way over the top of the oldest ranch in San Diego and ran a ridge with what has the appearance of a vernal pool, springs, seeps, and inside the recommended wilderness. We produced an hour long video of this to demonstrate that this option was not nearly appropriately identified and should be removed from consideration. We hope that this is now moot with the preferred alternative.

In response to this objection the next suggested alternative was even worse. The author, to put it mildly was upset and taken back. This option goes straight up the face of Cuyamaca Peak, the most visible object in the county from town, directly through the recommended Sill Hill Wilderness, and former wilderness study area and Inventoried Roadless area and right up beside an 800 foot cascading waterfall, one of the most spectacular as well as sensitive and unspoiled, remote and rugged sights in all of southern California. How it could find its way onto a utility right of way is beyond me. The contrast between an option that is about the most , inappropriate I've seen to date with one that is the most unprecedented and responsible and courageous to date is a stark contrast and still reminder of the tough battle to this point.

Please do not further any discussions of transmission lines or energy projects across the Sill Hill Unit of the Eagle Peak Recommended Wilderness.

The DEIS has photos of the "typical" scenic qualities of these areas. The one on Boulder Creek Road is erroneous and out of line. This pictures a rather close-up photo of the back yard of an elderly couple, one who is handicapped. Their yard is strewn with debris from the McCoy fire, a fire we believe began with the arching of the 69kV line and 12kV that did not have lightning arrestors installed to prevent this in a 100 mile per hour wind, which shorted and burned the homes of five residences and sent about 15 people running for their lives. This couple does not have immediate agility to leverage more response to the second of two fires ravaged upon them in 10 years.

Why was this photo used to show the "typical" scene of Boulder Creek Road? If you even so much as take the same photo on wide angle which I demonstrated, instead of the couple's yard as the focus what you see is the towering and sweeping Cuyamaca, 2<sup>nd</sup> highest peak in the county and the sweeping Boulder Creek and Sill Hill watershed, much, much more indicative of the "typical" scenery. This close-up only shows cases the misfortune of fire and wind upon an elderly couple living in a remote part of the county. It details nothing of the sweeping beauty for which they have endured these issues to be there and be able welcome every morning surrounded by the peaceful landscape, remaining together in retirement.



I took the above picture while trying to repeat and understand what the original photographer of the one shown in the DEIS was trying to accomplish. The two photos are very similar. Then below I show how just even taking the photo on wide angle presents a much different concept.



Please disclose how this narrow photo came to be in this document and why. We believe you can find a more appropriate photo to address your purpose. Please replace it for the permanent record of this documentation with a photo that is better indicative of the scenic landscape on Boulder Creek Road that we have come together after 15 years to preserve.

Since SDG&E has the heavy equipment to do so and because SDG&E is responsible for the behavior of their vendors who composed this photos, we might suggest that SDG&E can offer to assist this couple in the clean-up of their yard, the funds to compensate for the value of scrap metal removed.

Please provide a procedural amendment including some review and oversight prior to the release of publication that will prevent this type of misleading information from being released in the future.

We call on SDG&E to reflect upon the stresses their vendors place upon locals when coming onto their lands. This has generated a situation that deserves improvement. Please provide for the immediate repair and compensation for damage to local property when it happens-it does happen as much as three times a year per 10 acres of private easement. The damage to gates by vendors is a common, ongoing problem. Most commonly truck drivers break gates by problematically using their vehicles to push and swing them open. Please train them to take the extra step to get out and open them manually. This alone would spare both a number of headaches. SDG&E is responsible for the actions and training of these vendors just the same as if they were employees.

Please provide your plan and terms, to educate and prevent violations of export control laws.

AT the open house for the DEIS a member of the SDG&E team told the daughter acting on behalf of her mother the elderly trustee to the McCoy Estate that if they removed the TL626 that they would have to buy solar and all of the Boulevard loop would be without a backup. In is my understanding that the modifications to the 69kV line leading from the substation directly behind the Golden Acorn Casino on old Highway 80 to Boulevard is fixing this problem and that SDG&E has definitively put as much in writing to the USFS. I presume that this land owner was mistaken but nevertheless NEPA says that you must provide enough information so that the public as well as decision makers can make an informed decision. The McCoy Ranch is the oldest ranch in San Diego dating back to 1848 before we were even a state. It deserves preservation and its owner deserve considerable respect. Wittingly or not, they live in a remote condition and it is incumbent on you to ensure that they receive clear information about this project. NEPA does not specify the means of communication, but it is reasonable in face to face conversation with three representatives from SDG&E that this individual thought she had the best information available. . I did try to clarify for this representative of the McCoy Ranch but was unable considering that they believed that they had the official information coming from face to face and directly from SDG&E. It has created confusion for that land trust and indeed, because they are formidable speakers to the Cuyamaca planning group, to all members of that group. Additionally it has created marginalization of the rest of us trying to ensure that they understood why this is an outstanding and unprecedented collaboration long, long, long, hard fought and acquired by the USFS, the major utility, SDG&E, and environmental group representatives. It can only be obvious the advantage of demonstrating to one and all that this has been accomplished for one of the most exceptional remaining unspoiled areas of the Forest. Knowing this now you need to take responsible action. It has in incorrect and pervasive impact to this process in a key area. Please contact the trustee of the McCoy Ranch and her daughter and ensure that they understand that this is not the case.

Donna Tisdale and attorneys for the Boulevard Planning Group have presented some serious concerns for the handling of water transportation to the projects running through the Boulevard area. These concerns do not preclude the construction of these projects to date but they do raise serious questions. There are critical instructions, albeit even legal ones backed by law for how water is handled, conserved, and acquired for these huge projects. WE support and commend Ms Tisdale and the courageous efforts by the Planning Group that has had to be the lone renegade voices in defending the land and the standard deviation of the environmental bell curve. Please research in kind the water issues in the Forest. She has raised concerns that water was acquired from unapproved ground resources in our back country. This is a MOST critical issue. We have the most serious water issues this state has faced before us this year. Obviously the most pervasive source of water is the ocean but it MUST be desal'ed for any uses in a natural setting in the backcountry. We have experts that review these questions. Establish a "cradle to coffin" paper trail of all water receipts for these projects. It will project both YOU and the ecology of our backcountry. Please support these efforts to discover where these sources were acquired and remedy this problem immediately. We have seen water sources –and I have notified the Cleveland District Ranger on several occasions –such as Smith Pond that has been bone dry for three years after being completely full for several years prior, while on the other side of the most immediate ridge lines the ponds were at least partially full for part of the year in the three prior. I recognize that this is a severe drought but this seems uncommonly odd considering the close approximation. Ensure that in the case of water resources that purchases on reservation lands are not allowed without the same certification and approval as any other resource because the water table below is shared by our public resource in the National Forest as well as the local residences. Please make public this research when complete.

Include in a monthly bill flyer education about this critical issue as well as specific mailing to all parties that may not understand the gravity of the issue and are trying to sell water. Please ensure where this is uncovered that poverty issues are researched and redirected with appropriate funding. It has been my experience several times that the remote locals are not aware of the resources available to them and often even when they are they do not know how to acquire them. This is often seen as an insurmountable obstacle further frustrating their financial issue rather than mending them if they do not have trustable assistance. Our public agencies need to coordinate so that they are not further motivated to exploit critical level natural resources.

Here is a list of other issues we have acquired from our members and colleagues that we support and place into the record, they may be sent in more than once independent of this group. :

Pesticides and herbicides are prohibited along the cottonwood creek drainage. Pesticides herbicides are allowed everywhere else. This should be addressed for all significant streams or maybe the whole CNF.

We have documented runoff at 20% grades. It is still significant. Please consider that 25% grade is above best practices and should be lowered.

A standard does not "make" it good enough. Review all remaining dirt roads for functional compliance and erosion abatement.

The access line near Boulder Creek Road between mile four and seven contains several areas that are above 25% grade. This access road should be decommissioned with allowing it to re-vegetate and covered with erosion control. The line should undergrounded from mile 4 just past Sherilton Valley to the Boulder Creek Road high spot at mile 6. It should again be undergrounded from 6 to 7, and the most critical undergrounding for the remaining 12kV should be the mile prior to the Sill Hill Weather station across the sweeping Conejos Valley escarpment in the vicinity of Mile 8 and the Wild Cat tributary and fire box at that location. The access roads can be converted to undergrounding routes. Any areas that cannot be undergrounded should be altered into the USFS property and as close to Boulder Creek Road as possible.

In regards to all access and easement roads associated with and maintained by SDG&E for power lines on CNF lands as covered in the proposed master permit. Please survey and measure all road slopes in terms of percent grade as would be needed to implement road erosion control plans in the master permit document. It is my understanding, that no formal measurement or survey exists and that for the purpose of the master permit process, slope estimates were made by using topo map contour features. If necessary, please use the Data Request process to accomplish the slope measurement of all roads covered by the master permit. Please measure the slope of all roads at a reasonable minimum distance (20 foot) and at the highest level of slope for each downhill section.

Cease the storage of Dirt on Boulder Creek Road. This is not appropriate for the scenic integrity. Please coordinate with the county on erosion and back country road maintenance. They do not have this training. Alternatively take over the management of Boulder Creek Road from the county pave it and place in speed bumps. The placement of speed bumps is absolutely essential if the road is paved. This would do a lot for the consistent management of this area for the established Federal treasure that it is. There is apparent armature or training level competition to bulldoze this road. This needs Forest interface with the county as it is fully impacting the Forest. It makes little sense for the county presence where the management in all directions is Federal Forest. If the county cannot agree to Forest standards than this management needs to be transferred to the Forest for environmental clean water act reasons.

The DEIS contains language for "qualified professionals" to evaluate the roads for slope, erosion, corrective actions. Please provide and make public this information. Who are these qualified professionals? Who pays them? How long and often they will be inspecting? This should be any time before workers are allowed to grade.

All inspections need to be done on foot rather than from the seat of a wheeled vehicle or helicopter.

SDGE needs to contact the USFS planning and project teams before entering the forest to conduct projects and management and in a timely manner to address emergencies occurring on the forest.

All gates should be painted Forest Green or Forest brown natural colors!!!! Not white. The use of bright yellow and black warning colors should only be used where this is an issue. Some of these gates are rarely used and do not need to look like cartoons of bumble bees.

Additionally there is considerable if not universal agreement that the yellow bands on the new poles are inappropriate markings on the poles. Repaint all of these to match the poles. These yellow bands call out the poles and draw more attention than ever to them. These cannot be for air craft as they are much to low to be a consideration.

What impact does the yellow band have on bees? Will these attract bees in mass into a detrimental issue? Please consult an entomologist concerning the use of these bands. Additionally consult a mammologist in their interface to bats, and an ornithologist for bird impacts.

Consider pole color options when locating these poles where they are not removed or undergrounded. Prior to the Cedar Fire some of these poles were nearly invisible. Now they stand out everywhere. WE have photos of this.

Where is SDG&E using droids and cameras? These should NOT be used in the Forest.

Please provide a definitive plan for removing roads with unacceptable slope. Include the revegetation plans for these. Please include legible maps of these.

Provide a plan to monitor and correct road maintenance. Keep records where re-maintenance is required. If it continues to fail the road should be removed.

Language is included that says roads are to be built to withstand a 10 year peak rain. I dare say that none of the access roads along Boulder Creek Road can withstand a 10 year Peak rain. This would be corrected by undergrounding.

A push should be made to set a minimum time frame in which roads can be graded. For example, limiting them to once every 5 years unless a road falls to meet evaluation standards set forth by these qualified experts and the forest service. Also a system should be added that addresses roads that fail to meet the time standards more than a certain amount of time. WE are concerned that some are exploiting the bulldozing of access roads to create work. Please ensure this is not happening at rate payer and environmental expense.

After roads are serviced, the qualified professionals should inspect the work to assure all criteria is met.

Add language to require SDG&E to contribute to maintain Boulder Creek road for use issues during and after construction.

Add language regarding construction staging areas on private land. Site will be maintained to limit erosion and damage to surrounding forest lands. Site and surrounding forest land will be inspected at a future date to verify no damage and correct damage if found.

Update the wind data for Sill Hill weather station to 101.

Master plan should make public all new gates and barriers for public review and comment before the Master Plan moves forward. SDG&E is responsible for the assured training and actions of its vendors. SDG&E is responsible if there is damage done due to gates being damaged or left open. Ensure that reports of open gates have response within 24 hours.

Please require contractors to carry work orders and identification before entering private property. If they cannot document their presence on private property they are trespassing.

Please include language in the master permit to prohibit SDG&E and its contractors from installing cameras in the CNF. Please ensure this prohibition applies to both standard image/movie cameras and thermal/infrared cameras.

The master permit has a section in the document regarding C78, the 12kV power line that roughly parallels Viejas Grade road. The current plan moves the power line close to the road to minimize its impact on CNF lands. As currently proposed, I do support moving this power line. However, I request the master permit go one step further and remove the line in the CNF section that spans the two areas of private land. To clarify, this power line runs roughly east/west from the Descanso substation to the Viejas casino. The power line is connected on either end to the rest of the grid. The power line travels through private land on either side of the CNF land. All of the customers are on either side of the CNF land. I request the master plan remove this power line from the CNF land between the private properties on Viejas grade. Removing that middle section would increase public safety, increase the scenic integrity of the forest, and save SDG&E money. In fact, the only reason to keep this section appears to be future expansion plans along this route from the Descanso substation. Removal of this forest section would result in no loss of electrical service because the power line is supported and fed by both sides. Image/map shows C78 section in blue/green color on CNF forest land that should be removed.





Figure 2: Facilities to be Reconstructed

CNF Rev



As a condition of master permit approval, please require SDG&E to open up Bell Bluff Road for public access to National Forest lands along Bell Bluff. Public access includes either or both foot and/or vehicle usage. Please also require SDG&E to allow public access to mitigation property around the Suncrest Substation. Additionally negotiate with the county to reopen the former trail access on Japatul Valley Road to the Bell Bluff Summit.

Finally, please embark on a plan of cross training within SDG&E for Wilderness Awareness. WE would welcome the opportunity to show the wilderness we have come together to create!

In summary, the single biggest issue we have, one that we believe we share almost universally is that this Master Permit needs to call for the universal undergrounding of nearly all of these transmission and distribution lines. While this may not be possible overnight, so to speak, we believe that a definitive plan needs to be on the table, perhaps accompanied by a reasonable bond, to present a definitive schedule for accomplishing this goal.

We believe there is much in the near future that will revolutionize our interface to energy. We need to work together to ensure the best community agility possible to meet the opportunities when they arrive. This plan needs some flexibility to be readily available to adapt and accommodate the sure presentation of exciting new green energy resources that will not compromise large quantities of beautiful land or threaten the safety of the public.

And lastly once again we appreciate the efforts on all sides for the last 15 years or so that have ultimately shaped and defined this plan. We are grateful for the recent provision of a preferred alternative that is uniquely directed toward a collaborative step forward for the preservation of our most wild remaining and now recommended wilderness areas. Thank you for this monumental step forward in the Eagle Peak/ Boulder Creek areas. And most importantly, thank you for this universal opportunity to participate in democracy!

Sincerely,  
Cindy Buxton  
Chair, Forest Committee, Sierra Club, San Diego

November 4, 2014





Before

Hypothetical "after" in Cedar Gorge



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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Wednesday, November 05, 2014 12:00 AM  
**To:** CNFMSUP  
**Subject:** SDB&E Master Permit -- DEIR/DeIS  
**Attachments:** DSCN7007 (3).jpg; DSCN7007.JPG; DSCN7027 (2).jpg; DSCN7027 (1280x960).jpg;  
DSCN9613 (2).jpg; DSCN9712 (3).jpg

see attached hypothetical before and after photos when removing the TL626

Cindy Buxton  
Chair Forest committee, Sierra Club San Diego

*1964 Civil Rights 50 ~ Wilderness 50 ~ Beatles 50 Yea yea yea!*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

.....  
.....













**E – APPLICANT**





November 3, 2014

Lisa Orsaba, California Public Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest c/o Dudek  
605 Third Avenue  
Encinitas, CA 92024

**Subject: San Diego Gas and Electric Company's Comments on the Draft Environmental Impact Report/Environmental Impact Statement for the Master Special Use Permit and Permit to Construct Powerline Replacement Projects**

Dear Ms. Orsaba and Mr. Metz:

San Diego Gas & Electric Company (SDG&E) appreciates this opportunity to submit comments on the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for SDG&E's proposed Master Special Use Permit and Permit to Construct Power Line Replacement Projects (Proposed Project).

If approved, SDG&E's proposal to fire harden multiple existing electric lines located in and around the Cleveland National Forest will greatly benefit the public by enhancing fire safety in high fire risk areas, improving electric system safety and performance during extreme weather conditions, and reducing the cost and environmental impacts of future maintenance activities. The release of the Draft EIR/EIS prepared by the California Public Utilities Commission (CPUC) and the United States Forest Service (USFS) is a significant step towards realizing these public safety and reliability benefits.

SDG&E appreciates the efforts by you and your staff to work with SDG&E over the last decade to develop and refine proposed activities that balance our mutual interests, including public safety, electric service reliability and environmental resource protection. SDG&E's basic application in the mid-1990s to renew land rights through the Cleveland National Forest has evolved into SDG&E's comprehensive proposal submitted in 2012 to "fire harden" five existing 69-kilovolt (kV) power lines and six existing 12kV distribution lines, including replacement of approximately 1,800 wood poles with fire-resistant steel poles and for the USFS to adopt a Master Special Use Permit that establishes consistent terms and conditions for SDG&E to operate and maintain these facilities within the Cleveland National Forest. SDG&E's 2012 proposal was developed in consultation with USFS staff to include undergrounding approximately 13 miles of existing overhead lines with the closure of associated access roads and a robust program for avoiding, minimizing, and mitigating environmental impacts. The proposal

analyzed in the Draft EIR/EIS reflects much of this consultation between SDG&E and USFS, as well as significant coordination with the CPUC, other agencies and stakeholders.

We note that the Draft EIR/EIS analyzes *even more* measures to promote fire safety and/or assure resource protection than SDG&E proposed in its 2012 application. These additional measures include an alternative that would remove Tie Line 626 and associated access roads from service, which would restore aquatic, visual, cultural and natural resources along this 19 - mile alignment. Although SDG&E's original proposal was to reconstruct TL 626 within the existing alignment, SDG&E has determined that removing the line from service, with SDG&E's alternative for TL 6931, is technologically feasible and will reduce the costs associated with the project. For these reasons, SDG&E will construct the TL 6931 alternative and remove TL 626 from service if the CPUC and USFS conclude that it is feasible and appropriate to do so.

SDG&E's technical team has prepared the enclosed detailed comments on the Draft EIR/EIS for your review and consideration. SDG&E's primary goals in preparing these comments are to assure an accurate and complete record and to identify and resolve issues that could delay implementation of the Proposed Project if not addressed at this stage. SDG&E would be happy to provide additional information upon request. SDG&E remains eager for the Proposed Project and its associated public safety work to proceed.

Thank you again for the opportunity to comment on the Draft EIR/EIS and for all your efforts to reach this significant milestone. We look forward to continuing to work with you to implement this important safety and reliability project.

Sincerely,



David L. Geier

Vice President, Electric Transmission & System Engineering

Enclosures;

SDG&E Draft EIR/EIS Comments

**MASTER SPECIAL USE PERMIT AND  
PERMIT TO CONSTRUCT POWERLINE REPLACEMENT PROJECTS**

**SAN DIEGO GAS & ELECTRIC COMPANY'S COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT/  
ENVIRONMENTAL IMPACT STATEMENT**

San Diego Gas and Electric Company (SDG&E) appreciates the opportunity to provide comments to the California Public Utilities Commission (CPUC) and the U.S. Forest Service (USFS) on the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Master Special Use Permit and Permit to Construct Powerline Replacement Projects in the Cleveland National Forest (CNF).

Several of SDG&E's comments raise important legal issues, including the infeasibility of alternatives and excessive mitigation measures. SDG&E requests that the CPUC and USFS incorporate the following information into the Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS).

SDG&E's Proposed Project would consolidate over 70 existing special use permits and easements for SDG&E facilities within the CNF, and would permit the replacement of five existing 69 kilovolt (kV) power lines and portions of six 12 kV distribution circuits located within and outside of the CNF. (Draft EIR/EIS at p. B-1.) SDG&E proposes to replace the identified lines with fire-hardened equipment, along with relocation, removal, undergrounding, and single-circuit to double-circuit conversion along certain facilities and segments. (*Id.*)

As set forth in the attached alternatives analysis, SDG&E continues to believe that SDG&E's Proposed Project is the environmentally superior option for meeting SDG&E's and the CPUC's objectives. (*See* Draft EIR/EIS at p. A-8.) SDG&E's Proposed Project would: (1) permit SDG&E to continue to operate and maintain existing SDG&E facilities within the National Forest System lands; (2) increase fire safety and service reliability; (3) be consistent with the CPUC's General Orders, the North American Electric Reliability Corporation and Federal Energy Regulatory Commission's requirements, and SDG&E's standards; and (4) minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible, all in furtherance of SDG&E's and the CPUC's objectives.

SDG&E has prepared the attached alternatives consistency analysis, which identifies whether each proposed alternative analyzed in the Draft EIR/EIS meets the Proposed Project's objectives. As set forth in greater detail below, SDG&E is particularly concerned by elements of the Federal Proposed Action that would result in greater environmental impacts than SDG&E's Proposed Project. SDG&E is also concerned that certain elements of the Federal Proposed Action have not yet been demonstrated to be technically feasible. In contrast, SDG&E's Proposed Project is feasible, implementable, and would result in fewer environmental impacts.

Separately, SDG&E requests revisions to certain biological mitigation measures to ensure proportionality and consistency with SDG&E's existing biological protection requirements. SDG&E also requests that certain technical inaccuracies in the Draft EIR/EIS be corrected in the Final EIR/EIS, as set forth in the attached charts of proposed line revisions.

The comments and attached materials more fully describe SDG&E's concerns and include proposed modifications to the mitigation measures and Draft EIR/EIS to address these concerns. SDG&E believes that none of the information in these comments would trigger recirculation of the Draft EIR/EIS under applicable state or federal law.

SDG&E appreciates the CPUC's and USFS's review and consideration of these comments. SDG&E looks forward to working with the agencies in furtherance of this important public safety project.

**I. THE FEDERAL PROPOSED ACTION IS NOT FEASIBLE AND HAS GREATER ENVIRONMENTAL IMPACTS THAN SDG&E'S PROPOSED PROJECT**

The Federal Proposed Action modifies SDG&E's Proposed Project along four project alignments: TL626, C157, C440, and TL682. (Draft EIR/EIS at p. ES-5.)

Under the California Environmental Quality Act (CEQA), any decision to move forward with the Federal Proposed Action must be supported by substantial evidence. (Cal. Pub. Res. Code § 21168; CEQA Guidelines [Cal. Code Regs. tit. 14] § 15384(a).) Similarly, under the National Environmental Policy Act (NEPA), federal agencies must take a "hard look" at environmental consequences before deciding on a proposed action.<sup>1</sup> (*Kleppe v. Sierra Club*, 427 U.S. 390 (1976).)

SDG&E is concerned that the portions of the Federal Proposed Action that deviate from SDG&E's Proposed Project are not feasible, and that the Draft EIR/EIS does not justify adequately the selection of certain components of the Federal Proposed Action and does not fully analyze their potential environment impacts, as set forth in greater detail below.

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<sup>1</sup> The Federal Preferred Action differs from the Federal Proposed Action in two ways. First, the TL626 relocation option has been replaced by the TL626 removal from service option. Second, the Federal Preferred Action incorporates the portions of the partial removal of overland access road alternative applicable to TL625, C442, and TL629. All other components of the Federal Proposed Action are unchanged in the Federal Preferred Action. (Draft EIR/EIS at p. ES-18.)

**A. The Draft EIR/EIS Does Not Support Realigning TL626**

**1. SDG&E's Proposed Project for TL626 Meets All Project Objectives and Reduces Environmental Impacts**

SDG&E has proposed to fire-harden the existing 18.8-mile, 69 kV power line named TL626 from Santa Ysabel Substation to Descanso Substation. SDG&E would replace existing wood poles with 279 weathered steel poles, 10.1 miles of existing access roads would be maintained, the Boulder Creek crossing would be eliminated, and turnarounds would be installed at either side of Boulder Creek to permit safe vehicle maneuvering. (Draft EIR/EIS at pp. B-5, B-11 to B-12.)

Fire-hardening the existing length of TL626 would meet all of SDG&E's and the CPUC's project objectives, and would be consistent with the USFS's statement of purpose and need for the project. (Draft EIR/EIS at pp. A-8 to A-9.) In addition, because TL626 would be fire-hardened in place, most activity would be limited to already-disturbed areas, in furtherance of SDG&E's project objectives. (Draft EIR/EIS at p. A-9.)

**2. Removing TL626 from Service Would Also Meet Project Objectives and Limit Environmental Impacts**

The Draft EIR/EIS concludes that removing TL626 from service would, under CEQA, be environmentally superior to SDG&E's Proposed Project for TL626, and to various rerouting options considered as part of the Federal Proposed Action and described in greater detail below. (Draft EIR/EIS at pp. ES-15, ES-18.) SDG&E agrees that removing TL626 from service would be superior to all of the analyzed rerouting options.

SDG&E has determined that removing TL626 from service is technologically feasible and would reduce the costs associated with the Proposed Project. Therefore, in the event that SDG&E's Proposed Project for TL626 is not selected, SDG&E would support the removal of TL626 from service.<sup>2</sup>

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<sup>2</sup> The Forest Service's statement of purpose and need for the Proposed Project provides that the Proposed Project should be consistent with the CNF Land Management Plan (LMP). SDG&E notes that the Forest Service is evaluating the Cedar Creek undeveloped area around TL626 for recommended wilderness zoning in the pending CNF LMP Amendment. If the Cedar Creek undeveloped area is designated recommended wilderness, SDG&E may not have the ability to remove the existing line and poles using mechanized equipment. Therefore, SDG&E may need to obtain a LMP amendment or an in-lieu exception to permit TL626 decommissioning with mechanized equipment. SDG&E asks that, if the Cedar Creek undeveloped area is ultimately designated recommended wilderness and the TL626 removal from service option is selected, the Forest Service Preferred Action be revised to include an amendment or exception to allow for

Under this alternative, TL626 would be removed from service. SDG&E would implement various system upgrades and changes in order to provide service lost due to the removal of TL626, as described in the Draft EIR/EIS. (Draft EIR/EIS at p. ES-9.) SDG&E notes that the Draft EIR/EIS provides two options for SDG&E to continue to provide reliable electricity to existing customers at Boulder Creek substation. First, SDG&E could convert a 6.5 mile section of TL626 from 69 kV to 12 kV distribution. Alternatively, SDG&E could serve the load with a local off-grid photovoltaic system. (*Id.*) SDG&E would prefer to implement the off-grid solution if an agreement can be reached with the existing customer.

### **3. The Federal Proposed Action's Rerouting Alternatives for TL626 Are Not Environmentally Superior or Feasible and Would Not Meet Project Objectives**

The Federal Proposed Action with respect to TL626 is to relocate a section of TL626 out of the Cedar Creek undeveloped area. The USFS is therefore evaluating five options to relocate TL626. SDG&E is deeply concerned about the feasibility and impacts of these options, as set forth in greater detail below. The Draft EIR/EIS concludes that Options 1 through 4 would not be environmentally superior to SDG&E's proposed reconstruction of TL626 in place. (Draft EIR/EIS at p. ES-12.) Further, the Federal Preferred Action would not select *any* of the proposed rerouting options, and would instead remove TL626 from service. (Draft EIR/EIS at p. ES-18.)

While SDG&E agrees that the rerouting options would not be environmentally superior and should not be included in the Federal Preferred Action, SDG&E is concerned that the Draft EIR/EIS does not analyze adequately the potential environmental impacts associated with rerouting TL626. In particular, the Draft EIR/EIS fails to disclose a number of potential environmental impacts that could result if any of the TL626 alternative routes described in the Federal Proposed Action were to be selected.

Specifically, Option 1, Overhead Alignment through Inaja and Cosmit Indian Reservation Lands, and Option 2, Overhead Alignment around Inaja and Cosmit Reservation Lands, would both fail to meet SDG&E's objective to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible and would also fail to meet the USFS's stated need for resource protection. (Draft EIR/EIS at pp. A-7 to A-8.) These options would require additional construction, as well as new operation and maintenance impacts to previously undisturbed areas and previously unencumbered landowners, effectively shifting the burden of TL626 from the USFS to private landowners and the Inaja and Cosmit Indian Reservation. In addition, SDG&E cannot condemn Tribal trust lands because these lands are owned by the United States. Any easement across these lands must have the consent of the Tribe for whom

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removal of TL626 using mechanized equipment, and further requests that such amendment or exception be processed concurrently with the Final EIR/EIS.

such land is held in trust. Therefore, locating TL 626 on Tribal lands raises considerable uncertainty about the feasibility of this route.

Option 3, Partial Underground Relocation in Boulder Creek Road, would also fail to meet SDG&E's objective to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible and would fail to meet the USFS's stated need for resource protection. (Draft EIR/EIS at pp. A-7 to A-8.) SDG&E has previously noted that the terrain along Boulder Creek Road is not conducive to constructing an underground power line, potentially rendering any underground relocation of TL626 along Boulder Creek Road technically infeasible. SDG&E has determined that it would be physically impossible to construct the necessary underground conduit in portions of Boulder Creek Road with sharp hairpin turns. The sharp radius of these turns prohibit the ability to install the cable package entirely underneath the road. In addition, the presence of slopes in excess of 12% greatly increases the likelihood of damage to the underground cable.

Option 3 would also require additional temporary and permanent disturbance to previously undisturbed areas along and adjacent to Boulder Creek Road and would have the potential to result in additional air quality impacts beyond those that would occur with SDG&E's Proposed Project. The additional underground construction that would be required as part of Option 3 would result in additional construction emissions, including PM<sub>10</sub> emissions. These emissions would be greater than those that would occur if SDG&E fire hardened the existing overhead lines.

Option 4, Overhead Relocation along Boulder Creek Road, would also present challenges that are not analyzed adequately in the Draft EIR/EIS. Under this alternative, a portion of TL626 would be relocated within the vicinity of the USFS's TL626 study corridor along Boulder Creek Road. (Draft EIR/EIS at p. B-31.) In order to implement Option 4, however, SDG&E may be required to acquire or construct new access roads along Boulder Creek Road. Boulder Creek Road is not sufficiently wide in all areas to support construction activities from the roadway shoulder or edge of road without creating unnecessary safety hazards and potential line of site issues for motorists; thus, some off-road access areas would be required. Therefore, Option 4 does not meet SDG&E's objective to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible, nor does it meet the USFS's stated need for resource protection. (Draft EIR/EIS at pp. A-7 to A-8.) The Final EIR/EIS's analysis of Option 4 should consider the impacts associated with the construction of these new access roads.

Option 5, Reroute and Undergrounding around Inaja Picnic Area, would also fail to meet SDG&E's objective to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible—and the USFS's stated need for resource protection (Draft EIR/EIS at pp. A-7 to A-8)—because this option would require temporary and permanent

impacts to previously undisturbed areas during construction, as well as additional temporary impacts to nearby parking areas and other facilities during operation and maintenance activities. Due to engineering design and safety requirements, the riser poles for Option 5 must be at least 83 feet tall, and new poles constructed as part of the relocation around the Inaja Picnic Area would likely be constructed and maintained using helicopters due to a lack of existing access and steep terrain. Maintenance of the riser poles and the underground system in this area would impact access to parking for the Inaja Picnic Area during construction, operation and maintenance, and inspection activities. Additionally, aerial marker balls may still be required on the new alignment at the San Diego River crossing. The Final EIR/EIS should disclose these potential increased environmental impacts.

**B. The Mount Laguna (C440) Underground Alternative Is Infeasible and Has Greater Environmental Impacts than SDG&E's Proposed Project**

SDG&E proposes to fire-harden the existing length of C440 in the Mount Laguna Recreation Area. As described on page B-33 of the Draft EIR/EIS, however, the Federal Proposed Action would place the segments of C440 located within the Mount Laguna Recreation Area underground along existing roads.

The Mount Laguna Underground Alternative would require the undergrounding of 14.3 miles of existing overhead 12 kV line, with 1.5 miles of line on private land and 12.8 miles of line on National Forest system lands. (Draft EIR/EIS at p. B-33.) This alternative would require the removal of 348 existing power poles and any existing access roads not used for underground locations. (*Id.* at p. B-34.) In contrast, SDG&E's Proposed Project would fire-harden the existing overhead line in place, and would not result in any of the increased environmental impacts associated with underground trenching and construction.

SDG&E is surprised by the USFS's proposal to more than double the amount of undergrounding in the Federal Proposed Action, considering the lengthy process that SDG&E and the USFS undertook to identify and prioritize the 13 miles of distribution lines to be undergrounded as part of SDG&E's Proposed Project. The Draft EIR/EIS does not provide any justification for the USFS's proposal to underground an additional 14.3 miles of distribution lines at the top of Mount Laguna, nor does the Draft EIR/EIS identify the methodology used to decide which segments should be selected for additional undergrounding. The proposal is also not technically feasible, does not meet the Project's Objectives, and appears to have greater environmental impacts than SDG&E's Proposed Project.

**1. The Mount Laguna (C440) Underground Alternative Is Not Technically Feasible and Would Not Meet SDG&E’s Project Objectives**

SDG&E has concerns about the technical feasibility of the Mount Laguna Underground Alternative. The Draft EIR/EIS contemplates that all undergrounding conducted as part of this alternative would be within existing roads. (Draft EIR/EIS at p. B-33.) Confining the undergrounding to existing roads may not be feasible in all locations due to the need to transition between the overhead and underground line and connect to adjacent customers. (See Cal. Pub. Res. Code § 21061.1 [defining “feasible” as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.”].) Because this alternative may not be technically feasible, it should not be carried through as an alternative considered in the Final EIR/EIS. Under CEQA and NEPA, only “feasible” or “reasonable” alternatives need be considered. (See CEQA Guidelines § 15126.6(a) [alternatives presented in an EIR must be potentially feasible]; *Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal. 3d 553, 565 (1990) [agencies “shall be guided by the doctrine of ‘feasibility’” when selecting alternatives for study in an EIR]; 40 C.F.R. § 1502.14(a) [only “reasonable alternatives” must be explored].)

The Mount Laguna Underground Alternative fails to meet SDG&E’s objective to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible. (See Draft EIR/EIS at p. A-8.) Because confining all undergrounding to existing roads may not be feasible, this alternative would require additional ground disturbance from trenching and grading activities, which may not be feasibly contained to previously disturbed areas. In light of these additional environmental impacts, the Mount Laguna Underground Alternative would also fail to meet the USFS’s purpose and need for the Proposed Project, which takes into account “resource protection” and emphasizes the importance of implementing the Proposed Project “in a manner that is consistent with the CNF Land Management Plan.” (Draft EIR/EIS at p. A-7.) Further, in light of the requirement to transition C440 from overhead to underground and the inherent reliability risks associated with such transitions, the Mount Laguna Underground Alternative would also be less likely to meet the CPUC’s objective to “[i]mprove the reliability of power delivery to surrounding communities.” (Draft EIR/EIS at p. A-8.)

**2. Environmental Impacts of the Mount Laguna (C440) Underground Alternative**

The Mount Laguna Underground Alternative has the potential to result in greater adverse environmental impacts as compared to SDG&E’s Proposed Project, including greater impacts to air quality, biological resources, and cultural resources. These impacts are direct impacts from

undergrounding that the environmental analysis should address. (See CEQA Guidelines § 15358(a)(1); 40 C.F.R. §§ 1502.16, 1508.8(a).)<sup>3</sup>

SDG&E appreciates the Draft EIR/EIS's recognition that further undergrounding, as proposed by the USFS, would not be environmentally superior under CEQA as compared to SDG&E's Proposed Project for C440. (Draft EIR/EIS at pp. ES-14, ES-17.) Thus, should the CPUC select the Mount Laguna Underground Alternative, the CPUC would be required under CEQA to find that the environmentally superior alternatives identified in the Draft EIR/EIS, which include SDG&E's Proposed Project, are "infeasible" before approving the project. (Cal. Pub. Res. Code § 21081(a)(3).) There does not appear to be a basis for such a finding with respect to SDG&E's Proposed Project.

SDG&E requests that the Final EIR/EIS include more discussion of the potential environmental impacts in the following impact areas that could occur from the USFS's additional proposed undergrounding of C440.

**Air Quality.** Adding 14.3 miles of new underground construction would result in additional construction emissions, including PM<sub>10</sub> emissions. Although the Proposed Project is within the acceptable threshold for PM<sub>10</sub>, this additional undergrounding could result in additional PM<sub>10</sub> emissions. These emissions would be greater than those that would occur if SDG&E fire hardened the existing overhead lines. Therefore, the Final EIR/EIS should model and analyze the increased emissions associated with undergrounding the Mount Laguna Underground Alternative.

**Biological Resources.** Host plants and habitat for several invertebrate species, including the Mormon metalmark and the Laguna Mountains skipper, are known or suspected to occur within the vicinity of C440 and the Mount Laguna Recreation Area. (See Draft EIR/EIS at

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<sup>3</sup> Providing any of the information requested in SDG&E's comments would not trigger recirculation of the Draft EIR/EIS. Under CEQA, recirculation is not required unless "significant new information" is added to an EIR after public notice of the availability of the draft EIR. (CEQA Guidelines § 15088.5(a).) The CEQA Guidelines provide that "[n]ew information added to an EIR is not 'significant' unless the EIR is changed in such a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." (*Id.*) "Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." (CEQA Guidelines § 15088.5(b).) None of the limited additional information contained in these comments constitutes "significant new information" requiring recirculation because the new information does not identify new significant impacts, an increase in impact severity, or a new feasible alternative or mitigation measure that SDG&E declines to implement. (CEQA Guidelines § 15088.5(a).)

Appendix BIO-4.) SDG&E has conducted extensive surveys within this area and has designed its Proposed Project to minimize the number of poles to be constructed within critical habitat. (Draft EIR/EIS at Appendix BIO-5, p. BIO-5-5.) If undergrounding C440 in this area is required, however, portions of this vegetation would need to be cleared. Therefore, the Mount Laguna Underground Alternative has the potential to result in greater impacts to biological resources than SDG&E's proposal to fire harden the existing overhead lines with the fewest possible replacement poles.

**Cultural Resources.** The Mount Laguna Recreational Area is known to be rich with cultural resources. (See Draft EIR/EIS at pp. D.5-18 to D.5-21.) Trenching for underground facilities, even within existing roadways, has the potential to negatively impact existing cultural resources to a greater degree than fire hardening the existing overhead lines. While the USFS's proposed underground route for C440 has been assessed for potential impacts to cultural resources, actual impacts would depend on final design, including the design for secondary lines, takeoffs, and riser poles needed to connect the new undergrounded facilities to the main underground line. Thus, all cultural resources listed in the Cultural Resources Technical Report for C440 and determined to be within the Project Area of Direct Impact could be impacted if the undergrounding is required, including several sites that have been determined eligible for listing in the National Register of Historic Places and California Register of Historic Resources.

For these reasons, SDG&E asks that the USFS reconsider including the Mount Laguna Undergrounding Alternative as part of the Federal Proposed Action and fully evaluate the potential impacts and trade-offs associated with additional undergrounding.

**C. The Partial Removal of Overland Access Roads Alternative Would Fail to Meet Project Objectives and Could Result in Greater Environmental Impacts than SDG&E's Proposed Project**

SDG&E is also concerned about the Draft EIR/EIS's consideration of the partial removal of the overland access roads alternative, which would remove up to 10.5 miles of existing access roads along TL626, TL625, TL629, and C442. (Draft EIR/EIS at pp. ES-9, ES-14 to ES-15.)

Removing existing access roads would not meet SDG&E's objectives to increase fire safety and service reliability, or to minimize potential environmental impacts by locating facilities within previously disturbed areas where feasible. Nor would removing existing access roads meet the USFS's stated need for resource protection. (Draft EIR/EIS at pp. A-7 to A-8.) Removing existing access roads would require operation and maintenance activities to be conducted by helicopter. While helicopters are useful for reaching remote and otherwise inaccessible areas, requiring operation and maintenance activities to be conducted by helicopter rather than by existing access roads would increase the response times required for maintenance or emergency conditions.

This alternative would also not meet the CPUC's objectives to reduce fire risk by fire hardening electric facilities in and around the CNF and to improve the reliability of power delivery to surrounding communities, as it would decrease the effectiveness of fire hardening activities, and increase response times during service calls and outages. (*See* Draft EIR/EIS at p. A-8.) Additionally, access roads to SDG&E facilities are commonly used by fire agencies and emergency responders during wild land fires, natural disasters, medical aid for forest users, or others events. Elimination of these access roads would negatively impact the response time and effectiveness during these incidents.

SDG&E is also concerned that the Draft EIR/EIS does not evaluate all environmental impacts associated with the partial removal of existing overland access roads. If overland access roads are removed, SDG&E would need to conduct maintenance activities using helicopters. As a result, permanent landing zones, temporary staging areas, and footpaths would be required, creating new impacts in previously undisturbed areas, including potential impacts on air quality, biological resources, and cultural resources. These impacts would be reasonably foreseeable indirect impacts of the partial removal of overland access roads. CEQA Guidelines § 15358(a)(2) [defining "indirect effects" as those effects which are caused by the project "and are later in time or farther removed in distance, but are still reasonably foreseeable"]; 40 C.F.R. § 1508.8(b) [same].) Both CEQA and NEPA require that indirect effects be analyzed in an EIR or EIS. (*See City of Davis v. Coleman*, 521 F.2d 661 (9th Cir. 1974) [EIS must evaluate reasonably foreseeable effects of a proposed action]; 42 U.S.C. § 4332(C); 40 C.F.R. § 1508.8.) Therefore, these reasonably foreseeable impacts of the partial removal of existing overland access roads should be addressed and analyzed in the Final EIR/EIS to inform the decisionmakers better as to the full impacts of this alternative.

## **II. THE FINAL EIR/EIS SHOULD REVISE OR ELIMINATE PROPOSED MITIGATION MEASURES THAT ARE NOT "ROUGHLY PROPORTIONAL" TO PROJECT IMPACTS OR CONFLICT WITH SDG&E'S SUBREGIONAL NATURAL COMMUNITY CONSERVATION PLAN**

Under CEQA and NEPA, mitigation measures should be feasible and roughly proportional to the impacts of a proposed project. (*See* CEQA Guidelines § 151.26.4; 40 C.F.R. § 1508.20; Council on Environmental Quality (CEQ), *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations*, 46 Fed. Reg. 18026 (March 23, 1981) (as amended) (Forty Questions) Nos. 19a, 19b.) Specifically, under CEQA, "[m]itigation measures must be consistent with all applicable constitutional requirements[.]" (CEQA Guidelines § 15126.4(a)(4).) Thus, "[t]here must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)." (CEQA Guidelines § 15126.4(a)(4)(A).) Furthermore, "[t]he mitigation measure must be 'roughly proportional' to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994)." (CEQA Guidelines § 15126.4(a)(4)(B).) In fashioning

mitigation measures, agencies should ensure that the mitigation actually relates to the impacts caused by the project in question, and do not create unwarranted or unduly burdensome mitigation requirements.

Following these standards, several proposed mitigation measures should be either eliminated or modified to be roughly proportionate to the potential resource impact, as set forth below. These points are supplemented by the accompanying table of mitigation-specific comments.

**A. SDG&E’s Subregional Natural Community Conservation Plan Establishes Maximum Mitigation Ratios that Cannot Be Increased by the CPUC and USFS**

**1. SDG&E’s Subregional Natural Community Conservation Plan Satisfies SDG&E’s Species Obligations Pursuant to State and Federal Law**

SDG&E has successfully implemented its Subregional Natural Community Conservation Plan (NCCP), which also serves as a Habitat Conservation Plan under the federal Endangered Species Act (ESA), since 1995. (*See* NCCP at p. 7; Cal. Fish & Game Code § 2800, *et seq.*)

The NCCP is a comprehensive program of measures to protect and enhance the recovery of species under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). The NCCP covers the installation, use, maintenance, and repair of SDG&E’s existing gas and electric system and typical expansion to that system and estimates and defines the mitigation that may be required for the biological impacts resulting from such covered activities. The NCCP authorizes the incidental take of listed and other covered species related to such activities and satisfies SDG&E’s requirements for the mitigation of impacts to covered species under the ESA and California Endangered Species Act (CESA). (*See* NCCP at p. 7; Cal. Fish & Game Code § 2830.) Specifically, SDG&E’s NCCP includes an ESA Section 10(A) permit and a CESA Section 2081 permit for incidental take and an Implementation Agreement with USFWS and CDFW for the management and conservation of multiple species and their associated habitats consistent with the ESA, CESA, and California Natural Community Conservation Planning Act.

The NCCP’s Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Implementing Agreement and the NCCP meet all applicable standards and requirements of the ESA, CESA, Natural Community Conservation Planning Act, and Native Plant Protection Act with regard to SDG&E’s activities in the NCCP’s defined area. (Implementing Agreement at ¶¶ 4.1-4.5, 6.2.)

By the terms of the NCCP's Implementing Agreement, no additional protective or mitigation measures, compensation, or preservation measures can be required for impacts to covered species within the NCCP's defined area. (Implementing Agreement at ¶¶ 4.1-4.5, 6.2.) Indeed, the Draft EIR/EIS recognizes and relies on the NCCP to address certain impacts to biological resources. For example, the Draft EIR/EIS notes that the NCCP will be incorporated into the Operating Plan. (Draft EIR/EIS at pp. D.4-88.) MM BIO-4 requires revegetation of native species in accordance with a Habitat Restoration Plan, as described in the NCCP, and MM BIO-5 notes that habitat compensation and restoration shall be in accordance with NCCP credits. (Draft EIR/EIS at p. D.4-101.)

Again by the terms of the NCCP's Implementing Agreement, the Draft EIR/EIS cannot eschew the NCCP's agreed-upon measures for other, select impacts. Because any potential impacts to covered species have already been fully analyzed and addressed by the NCCP, the CPUC and USFS cannot impose additional mitigation measures that are not required by USFWS and CDFW through the NCCP and Implementing Agreement.

**1. SDG&E Is Not Required to Obtain a Separate Section 2081 Permit or Engage in Section 7 Consultation**

MM BIO-20 suggests that SDG&E may need to acquire a Section 2081 permit or engage in Section 7 consultation with USFWS for impacts to state or federally listed species. SDG&E's NCCP, however, already provides incidental take coverage for most federally listed wildlife species potentially impacted by the Proposed Project, and also serves as a Section 2081 permit for covered state-listed species. (*See* NCCP at p. 8 [noting that the NCCP "satisfies all legal requirements necessary for [CDFW] to issue a Management Authorization for Covered Species under Fish & Game Code Sections 2081 and 2835, and NCCP Section 2825."].) As a result, SDG&E is not required to obtain a Section 2081 permit from CDFW or consult with USFWS for impacts to listed species covered by the NCCP. Therefore, SDG&E requests that MM BIO-20 be revised to clarify that SDG&E will only be required to obtain a Section 2081 permit or engage in Section 7 consultation with USFWS if the impacted species is not already covered by SDG&E's NCCP.

**2. The Draft EIR/EIS's Biological Mitigation Measures Should Be Revised for Consistency with NCCP Requirements**

SDG&E proposes to use the established, approved enhancement program described in and implemented by the NCCP, which includes approved compensation ratios, approaches, and success criteria. The Draft EIR/EIS, however, includes several mitigation measures that would appear to require mitigation beyond that contemplated in the NCCP.

For example, MM BIO-4, which requires SDG&E to restore all temporary construction areas pursuant to a Habitat Restoration Plan (as described in NCCP Section 7.2, Habitat

Enhancement Measures), seems to require compensation beyond that set forth in the NCCP if the restoration of temporary impact areas does not meet the success criteria in the proposed Habitat Restoration Plan. Because the NCCP provides the agreed-upon protection for impacts to native vegetation communities, MM BIO-4 should be revised to clarify that only the mitigation ratios required in the NCCP would be imposed.

Similarly, MM BIO-5 appears to require mitigation ratios for permanent impacts to native vegetation communities that are higher than the ratios that were previously approved by USFWS and CDFW in the NCCP. Not only would these higher ratios conflict with the approved NCCP, but the Draft EIR/EIS fails to justify the selection of the higher ratios. Because the NCCP satisfies SDG&E's requirements to protect covered species under the ESA and CESA (NCCP at p. 7), the Draft EIR/EIS should not attempt to impose additional mitigation for impacts to the same species.

Further, MM BIO-5 should be revised to clarify that it applies only to construction activities, not operation and maintenance activities. Because the Proposed Project consists of upgrades to existing power lines, operation and maintenance activities already occur on those lines. SDG&E has determined that future operation and maintenance activities are anticipated to be substantially the same in nature and in scope. Because operation and maintenance activities are currently conducted, these activities must be considered part of the existing environmental setting. Under CEQA, this environmental setting constitutes the baseline physical conditions by which a lead agency determines whether an impact is significant. (CEQA Guidelines § 5125(a); *Citizens for East Shore Parks v. Cal. State Lands Comm'n*, 202 Cal. App. 4th 549 (2011) [proper baseline for analysis of environmental impacts is "what [is] actually happening"].) Thus, the Draft EIR/EIS should not require mitigation for existing impacts unrelated to the Proposed Project's impacts. (*See, e.g.*, CEQA Guidelines § 15126.4(a)(4)(B).)

Section D.4.3.3, "Preserve Areas,"<sup>4</sup> is also unclear as to SDG&E's mitigation requirements. Section D.4.3.3 suggests that SDG&E would be required to mitigate pursuant to its NCCP requirements and also obtain additional mitigation for impacts within Preserves at either a 2:1 or 3:1 ratio.<sup>5</sup> As a result, this section could be interpreted to require total mitigation

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<sup>4</sup> The Draft EIR/EIS defines "Preserve" as "the area encompassed by the MSCP's Multi-Habitat Planning Area maps (as currently defined or ultimately adopted), the equivalent maps for the MSCP programs in San Diego County, the South Orange County NCCP Subregional Plan reserve area, and the Riverside County Conservation Agency Core reserve areas. If no preserve areas are formally delineated, those areas which are designated moderate, high, and very high-quality habitat are considered a 'Preserve.'" (Draft EIR/EIS at p. D.4-108.)

<sup>5</sup> SDG&E also requests that the Final EIR/EIS include an explicit reference explaining that should any elevated mitigation ratios be imposed by the USFS for impacts to USFS sensitive

ratios that are much higher than the ratios called for under the approved NCCP. In addition, compensation for impacts to sensitive vegetation located within Preserves is redundant since MM BIO-4 and MM BIO-5 already address compensation for impacts to sensitive vegetation.

Further, Section D.4.3.3 states that SDG&E must mitigate for a total of 447 acres, which appears to be more than double what SDG&E identified in its Plan of Development (POD). As described therein, the POD utilized a worst-case estimate of habitat to calculate the maximum mitigation requirement that could potentially result from implementation of the Proposed Project. Due to SDG&E's conservative approach, in practice, SDG&E's habitat impacts are typically less than those estimated in a POD. Therefore, the Draft EIR/EIS should not pre-judge SDG&E's mitigation requirements. Rather, all compensatory mitigation requirements should be based off of actual, as-built impacts; should exclude work areas in existing access roads, disturbed areas, paved areas, agricultural fields, and other habitat types that do not require mitigation per the NCCP; and should allow SDG&E adequate time to measure as-built impacts. In addition, the Final EIR/EIS should make clear that mitigation is not required for work areas in existing access roads, disturbed areas, paved areas, and agricultural fields, as such mitigation would lack the required correlation to project impacts. (CEQA Guidelines § 15126.4(a)(4)(A).)

### **3. SDG&E's NCCP Supersedes San Diego County's Multi-Species Conservation Plan**

Section D.4.3.3 also implies that SDG&E may be required to comply with San Diego County's Multi-Species Conservation Plan (MSCP). The requirements of SDG&E's NCCP, however, supersede San Diego County's MSCP. (*See* NCCP at p. 3 ["This Subregional Plan will cover all of SDG&E's Activities conducted within the [Subregional Plan Area], and will function independently of the Habitat Conservation Plans of local governments, which may also cover any part of the Subregional Plan Area."]; Implementing Agreement at ¶ 2.5.) As a result, any potential impacts within the MSCP area will be avoided or mitigated pursuant to the practices, procedures, and measures defined in the NCCP. SDG&E therefore requests that Table D.4-7 be revised accordingly to clarify mitigation requirements within the MSCP area.

#### **B. Nesting Bird Measures Should Focus on Bird Populations and Not Individual Birds**

SDG&E is also concerned that, as written, the Draft EIR/EIS implies that impacts to individual birds or nests, as opposed to bird populations, could be considered potentially significant under CEQA and adverse under NEPA. (*See* Draft EIR/EIS at p. D.4-149.) SDG&E

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resources, that such ratios will not be required for impacts outside the CNF boundary, as the USFS's jurisdiction does not extend beyond CNF boundaries. (*See* CEQ, Forty Questions, No. 19b.)

requests that the Draft EIR/EIS be revised to clarify that, under CEQA and NEPA, impacts to bird populations—not individuals—should be considered in determining whether there is a significant or adverse impact.

Pursuant to Appendix G of the CEQA Guidelines,<sup>6</sup> biological resource impacts are considered significant under CEQA if a project would have a substantial adverse effect on any *species* identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (CEQA Guidelines, Appendix G, § IV(a) [emphasis added].) As set forth below, impacts to “species,” as set forth in Appendix G, should be interpreted to mean impacts to a particular population.

The CEQA Guidelines are clear that a significant impact to biological resources may occur where a project has “the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; *cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community;*” or “*substantially reduce the number or restrict the range of an endangered, rare or threatened species.*” (CEQA Guidelines § 15065(a)(1) [emphasis added]; *see also* CEQA Guidelines § 15065(b)(2)(C) [endorsing mitigation that would “preserve, restore, or enhance sufficient habitat to mitigate the reduction in habitat and number of the affected species to below a level of significance.”].) This CEQA Guidelines section is an extension of the policy articulated in California Public Resources Code section 21001(c) to prevent “elimination of fish or wildlife species due to man’s activities, insure that fish and wildlife *populations* do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal *communities.*” (Cal. Pub. Res. Code § 21001(c) [emphasis added].)

To clarify further that impacts to bird species should be considered on a population, rather than individual, level, CDFW is in the process of proposing new regulations to implement Sections 3503 and 3503.5 of the California Fish and Game Code.<sup>7</sup> Section 681.4 of the draft regulations proposes the following language to clarify that impacts to bird species should only be considered significant if the impacts affect a bird *population*:

Where acting as a State Lead or Responsible agency, the Department will conform with § 21166 of the Public Resources Code, CEQA Guidelines (14 CCR) § 15096, and rely on the following thresholds of significance for impacts related to take, possession, needless destruction or destruction of native bird nests,

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<sup>6</sup> The Draft EIR/EIS uses CEQA criteria and guidelines as indicators of adverse effects under NEPA. (Draft EIR/EIS at p. D.4-89.)

<sup>7</sup> CDFW’s most recent draft of these proposed regulations is dated July 17, 2014, and is attached. SDG&E understands that CDFW plans to initiate the rulemaking process to adopt these new sections in the near term.

eggs or raptors. A significant impact on avian biological resources will occur if:

- (a) The project has a substantially adverse effect, either directly or through habitat modifications, on any population of a bird species identified as a candidate, threatened or endangered species by the Fish and Game Commission or a species of special concern by the Department of Fish and Wildlife.
- (b) The project has the potential to substantially reduce the habitat, restrict the range or cause a population of a bird species to drop below self-sustaining levels.
- (c) The project is likely to have long-term adverse consequences for one or more populations of native bird species, or
- (d) The project has direct or indirect environmental effects on bird species that are individually limited but cumulatively considerable.

For these reasons, SDG&E requests that the Final EIR/EIS be revised to clarify that only impacts to sensitive bird species or substantial impacts to bird populations would be considered significant under CEQA or adverse under NEPA.

SDG&E also requests that MM BIO-28 be revised to reflect CDFW's and USFWS's definition of a "nest." As written, MM BIO-28 would require nest monitoring if an "active nest" is identified adjacent to grading or site disturbance within the requisite nest buffer. "Active nest," however, is not a defined term in the California Fish and Game Code or the Migratory Bird Treaty Act. CDFW's proposed new regulations, described above, would define a nest as a "site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird." (*See* CDFW's Draft Regulations, § 681.2(e).) To ensure consistency with CDFW's interpretation of a "nest," SDG&E asks that MM BIO-28 be revised to remove references to "active nests" and incorporate CDFW's proposed nest definition.

### **C. Permanent Impacts by Definition Cannot Be Restored and Therefore Do Not Require Restoration**

Under NEPA and CEQA, the terms "effects" and "impacts" are used synonymously. Impacts can be either temporary or permanent. Permanent impacts typically result in irreversible effects or the removal of resources. By contrast, temporary impacts typically result in reversible effects on resources.

By definition, restoration is not possible for a permanent impact. Thus, under CEQA, mitigation measures that call for restoration of permanent impacts are infeasible and should not be imposed in an EIR. (See CEQA Guidelines § 15126.4(a)(1) [“An EIR shall describe *feasible* measures which could minimize significant adverse impacts . . .”] [emphasis added]; *id.*, § 15364.) The Draft EIR/EIS, however, appears to require SDG&E to attempt to restore areas subject to permanent impacts. Specifically, MM BIO-5 would require SDG&E to provide “habitat compensation or restoration for permanent impacts to native vegetation communities.” As written, it is unclear whether MM BIO-5 is intended to require habitat restoration at the specific area with permanent impacts or a location other than the location of the permanent impact. Because restoration is not possible for permanent impacts, SDG&E requests that the Final EIR/EIS revise MM BIO-5 to delete the words “or restoration” to make clear that SDG&E is not required to “restore” specific areas with permanent impacts.

### **III. THE FINAL EIR/EIS SHOULD INCORPORATE A SINGLE OPERATION AND MAINTENANCE PLAN TO IMPROVE EFFICIENCY AND INCREASE OPERATIONAL EFFECTIVENESS**

As part of SDG&E’s Plan of Development, as discussed over several years with the CPUC and USFS, SDG&E provided a Draft Operation and Maintenance Plan that would apply to SDG&E’s operation and maintenance activities throughout the life of the Master Special Use Permit. The Draft EIR/EIS includes myriad separate operation and maintenance plans across multiple resource areas. SDG&E requests that these separate plans be consolidated into a single Operation and Maintenance Plan to improve efficiency and increase operational effectiveness.

### **IV. CONCLUSION**

SDG&E appreciates the CPUC and USFS’s review of SDG&E’s Proposed Project and SDG&E’s comments on the Draft EIR/EIS. SDG&E respectfully requests that the CPUC and USFS consider SDG&E’s comments set forth herein and in the attached proposed line revisions when preparing the Final EIR/EIS.

**ALTERNATIVES CONSISTENCY ANALYSIS FOR THE SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E) CLEVELAND NATIONAL FOREST (CNF) POWER LINE REPLACEMENT PROJECTS MASTER SPECIAL USE PERMIT (MSUP) AND PERMIT TO CONSTRUCT (PTC)**

| Alternative   | SDG&E Objective 1:<br>Secure Forest Service Authorization to Continue to Operate and Maintain Existing SDG&E Facilities within the National Forest System Lands | SDG&E Objective 2:<br>Increase Fire Safety and Service Reliability of These Facilities by Replacing Five Existing 69 Kilovolt (kV) Power Line Facilities and Six Existing 12 kV Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions Consistent with California Public Utilities Commission (CPUC) General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission Requirements, and SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential Environmental Impacts by Locating Facilities Within Previously-Disturbed Areas Where Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire Hardening Electric Facilities in and Around the CNF | CPUC Objective 2:<br>Improve the Reliability of Power Delivery to Surrounding Communities | Explanation  |
|---|---|---|--|--|---|---|--|
| <b>Alternatives Considered under the Federal Proposed Action</b>                      |   |   |  |  |   |   |  |
| 69 kV Power Line (TL) 626 Alternatives  |   |   |  |  |   |   |  |
| <i>Option 1: Overhead Alignment through Inaja and Cosmit Indian Reservation Lands</i> | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 1 would not meet SDG&E Objective 4. This option would result in new construction as well as operation and maintenance (O&M) impacts to previously undisturbed areas and previously unencumbered landowners, effectively shifting the majority of the burden of TL626 from the USFS to private landowners and the Inaja and Cosmit Indian Reservation. |
| <i>Option 2: Overhead Alignment around Inaja and Cosmit Reservation Lands</i>         | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 2 would not meet SDG&E Objective 4. This option would result in new construction as well as O&M impacts to previously undisturbed areas and previously unencumbered landowners, effectively shifting the majority of the burden of TL626 from the USFS to private landowners.   |
| <i>Option 3: Partial Underground Relocation</i>                                       | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 3 would not meet SDG&E Objective 4. This  |

| Alternative  | SDG&E Objective 1:<br>Secure Forest Service Authorization to Continue to Operate and Maintain Existing SDG&E Facilities within the National Forest System Lands | SDG&E Objective 2:<br>Increase Fire Safety and Service Reliability of These Facilities by Replacing Five Existing 69 Kilovolt (kV) Power Line Facilities and Six Existing 12 kV Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions Consistent with California Public Utilities Commission (CPUC) General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission Requirements, and SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential Environmental Impacts by Locating Facilities Within Previously-Disturbed Areas Where Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire Hardening Electric Facilities in and Around the CNF | CPUC Objective 2:<br>Improve the Reliability of Power Delivery to Surrounding Communities | Explanation  |
|--|---|---|--|--|---|---|--|
| <i>in Boulder Creek Road</i>   |   |   |  |  |   |   | alternative would require additional temporary and permanent disturbance to previously undisturbed areas along and adjacent to Boulder Creek Road.   |
| <i>Option 4: Overhead Relocation along Boulder Creek Road</i>        | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 4 would not meet SDG&E Objective 4. This alternative would likely require additional temporary and permanent disturbance to previously undisturbed areas along and in the vicinity of Boulder Creek Road, as portions of this roadway are not sufficiently wide to support construction or permanent placement of 69 kV facilities within the current roadway area without creating unnecessary safety hazards and potential line of sight issues to motorists. |
| <i>Option 5: Reroute and Undergrounding around Inaja Picnic Area</i> | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 5 would not meet SDG&E Objective 4. This option would require temporary and permanent impacts to previously undisturbed areas during construction, as well as create additional temporary impacts to nearby parking areas and other facilities during O&M activities.   |

| Alternative   | SDG&E Objective 1:<br>Secure Forest Service Authorization to Continue to Operate and Maintain Existing SDG&E Facilities within the National Forest System Lands | SDG&E Objective 2:<br>Increase Fire Safety and Service Reliability of These Facilities by Replacing Five Existing 69 Kilovolt (kV) Power Line Facilities and Six Existing 12 kV Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions Consistent with California Public Utilities Commission (CPUC) General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission Requirements, and SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential Environmental Impacts by Locating Facilities Within Previously-Disturbed Areas Where Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire Hardening Electric Facilities in and Around the CNF | CPUC Objective 2:<br>Improve the Reliability of Power Delivery to Surrounding Communities | Explanation  |
|---|---|---|--|--|---|---|--|
| Distribution Line (C) 157 Partial Relocation to Avoid Designated Wilderness |   |   |  |  |   |   |  |
| <i>Option 1: SDG&amp;E Proposed Alignment between Two Wilderness Areas</i>  | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 1 would not meet SDG&E Objective 4. It would require new temporary and permanent impacts to previously undisturbed areas along Skye Valley Road.  |
| <i>Option 2: City of San Diego Modified Alignment</i>                       | ✓   | ✓   | ✓  |  | ✓   | ✓   | Option 2 would not meet SDG&E Objective 4. It would require new temporary and permanent impacts to previously undisturbed areas along Skye Valley Road.  |
| C440 Mount Laguna Underground Alternative                                   | ✓   | ✓   | ✓  |  | ✓   | ✓   | This alternative would not meet SDG&E Objective 4. It would result in substantial impacts to air quality as well as biological, cultural, and recreation resources within the Mount Laguna Recreation Area during construction, and would create additional impacts as a result of O&M requirements. |
| Bureau of Indian Affairs Proposed Action                                    | ✓   | ✓   |  |  | ✓   | ✓   | This alternative would not meet SDG&E Objectives 3 and 4. It would result in additional impacts to previously undisturbed areas as a result of undergrounding and line   |

| Alternative                               | SDG&E Objective 1:<br>Secure Forest Service Authorization to Continue to Operate and Maintain Existing SDG&E Facilities within the National Forest System Lands | SDG&E Objective 2:<br>Increase Fire Safety and Service Reliability of These Facilities by Replacing Five Existing 69 Kilovolt (kV) Power Line Facilities and Six Existing 12 kV Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions Consistent with California Public Utilities Commission (CPUC) General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission Requirements, and SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential Environmental Impacts by Locating Facilities Within Previously-Disturbed Areas Where Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire Hardening Electric Facilities in and Around the CNF | CPUC Objective 2:<br>Improve the Reliability of Power Delivery to Surrounding Communities | Explanation  |
|---|---|---|--|--|---|---|--|
|   |   |   |  |  |   |   | relocation activities. This alternative would also burden the ratepayers with project activities that benefit a private party, which is inconsistent with SDG&E Electric Tariff Book rules 2, 15, and 16.  |
| No Action Alternative                     |   |   |  |  |   |   | The No Action Alternative would not meet any of SDG&E's or the CPUC's objectives.  |
| <b>Additional Alternatives Considered</b> |   |   |  |  |   |   |  |
| Partial Removal of Overland Access Roads  | ✓   |   | ✓  |  |   |   | This alternative would not meet SDG&E Objectives 2 or 4. Removing existing access roads would require O&M to be conducted via helicopter, which increases the response times required for maintenance or in the event of an emergency. Removing existing access roads would also result in new landing areas and footpaths to provide access via helicopter, thereby creating new impacts in previously undisturbed areas. This alternative would also not meet the CPUC's objectives, as it would decrease the effectiveness of fire hardening activities and |

| Alternative   | SDG&E Objective 1:<br>Secure Forest Service<br>Authorization to<br>Continue to Operate and<br>Maintain Existing<br>SDG&E Facilities within<br>the National Forest<br>System Lands | SDG&E Objective 2:<br>Increase Fire Safety and<br>Service Reliability of<br>These Facilities by<br>Replacing Five Existing<br>69 Kilovolt (kV) Power<br>Line Facilities and Six<br>Existing 12 kV<br>Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions<br>Consistent with<br>California Public Utilities<br>Commission (CPUC)<br>General Orders, North<br>American Electric<br>Reliability<br>Corporation/Federal<br>Energy Regulatory<br>Commission<br>Requirements, and<br>SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential<br>Environmental Impacts<br>by Locating Facilities<br>Within Previously-<br>Disturbed Areas Where<br>Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire<br>Hardening Electric<br>Facilities in and Around<br>the CNF | CPUC Objective 2:<br>Improve the Reliability of<br>Power Delivery to<br>Surrounding<br>Communities | Explanation  |
|---|---|--|---|--|--|--|--|
|   |   |  |   |  |  |  | increase response times during service calls and outages due to extended access requirements and timelines.  |
| Removal of TL626 from Service                         |   |  |   |  |  |  |  |
| <i>Reconstruction of TL6931</i>                       | ✓   | ✓  | ✓   | ✓  | ✓  | ✓  | This alternative would meet all SDG&E objectives. Reconstruction and fire hardening of TL6931 would occur within existing ROWs, would utilize existing access roads, and require a minimum of helicopter access for construction and O&M activities. |
| <i>Development of the New 3-Mile Loop-in of TL625</i> | ✓   | ✓  | ✓   |  | ✓  | ✓  | This alternative would not meet SDG&E Objective 4. it would require new impacts to previously undisturbed areas for both pole locations as well as helicopter landing areas, staging areas, and footpaths.   |
| <i>Convert Portions of TL626 from 69 kV to 12 kV</i>  | ✓   | ✓  | ✓   | ✓  | ✓  | ✓  | This alternative would meet all SDG&E objectives.  |
| No Project Alternative                                |   |  |   | ✓  |  |  | The No Project Alternative would meet only SDG&E Objective 4, as the existing facilities would remain in place and no construction   |

| Alternative | SDG&E Objective 1:<br>Secure Forest Service Authorization to Continue to Operate and Maintain Existing SDG&E Facilities within the National Forest System Lands | SDG&E Objective 2:<br>Increase Fire Safety and Service Reliability of These Facilities by Replacing Five Existing 69 Kilovolt (kV) Power Line Facilities and Six Existing 12 kV Distribution Facilities | SDG&E Objective 3:<br>Undertake These Actions Consistent with California Public Utilities Commission (CPUC) General Orders, North American Electric Reliability Corporation/Federal Energy Regulatory Commission Requirements, and SDG&E Standards | SDG&E Objective 4:<br>Minimize Potential Environmental Impacts by Locating Facilities Within Previously-Disturbed Areas Where Feasible | CPUC Objective 1:<br>Reduce Fire Risk by Fire Hardening Electric Facilities in and Around the CNF | CPUC Objective 2:<br>Improve the Reliability of Power Delivery to Surrounding Communities | Explanation  |
|-------------|---|---|--|--|---|---|--|
|             |   |   |  |  |   |   | <p>or O&amp;M impacts would occur. This alternative would not provide USFS authorization, would not increase fire safety and service reliability of the electric lines, would not achieve CPUC or other regulatory standards, would not reduce existing or potential future fire risks, and would not improve service reliability.</p> |

**Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments**



| Comment #  | Section Name                              | Page # | Paragraph or Table # | General Comment  | Specific Comment   |   |
|--|---|--------|----------------------|--|--|---|
|  |   |        |                      |  | Existing Language  | Revised Language  |
| <b>Overarching Comments</b>  |   |        |                      |  |  |   |
| Numerous tables throughout the Draft EIR/EIS do not provide citations or references for included data. Please provide citations and/or references for all data tables included in the Final EIR/EIS.   |   |        |                      |  |  |   |
| Throughout the document, the terms “lead agencies” and “responsible lead agencies” are used, but are never defined. Please clarify in the document precisely which agencies are being referenced when these terms are used, or specifically list each agency being referenced at each instance and remove these ambiguous terms.   |   |        |                      |  |  |   |
| As part of SDG&E’s Plan of Development and as discussed extensively over several years with the California Public Utilities Commission (CPUC) and the United States Forest Service (USFS), SDG&E provided a Draft Operation and Maintenance Plan that would apply to these activities throughout the life of the Master Special Use Permit. The Draft EIR/EIS includes myriad separate operation and maintenance plans across multiple resource areas. SDG&E recommends that these separate plans all be consolidated into one final Operation and Maintenance Plan to improve efficiency and to increase operational effectiveness. |   |        |                      |  |  |   |
| The existing headings for Options 1 and 2 of the Forest Service Proposed Action include the phrase “SDG&E Proposed” for each option. SDG&E did not propose these options; rather, they were requested for consideration by the USFS and CPUC. The phrase “SDG&E Proposed” should be removed for all references to these options throughout the document.   |   |        |                      |  |  |   |
| The correct acronym for the United States Army Corps of Engineers (USACE) is USACE, not ACOE. SDG&E has included this change in the comments provided, but recommends this change be included consistently across the entire document for clarity.   |   |        |                      |  |  |   |
| Comments pertaining to mitigation measures have been included according to where in the text the specific comment occurs. All revisions should be carried forward to the respective mitigation measure tables in each section, as well as the final Mitigation Monitoring, Compliance, and Reporting Program for consistency.  |   |        |                      |  |  |   |
| <b>ES – Executive Summary</b>  |   |        |                      |  |  |   |
| 1.   | ES.4.2.2<br>Removal of TL626 from Service | ES-9   | Last paragraph       | SDG&E has yet to determine whether an off-grid solution for continued service in the vicinity of Boulder Creek Substation is the optimal solution in this area, and the decision to implement such a solution must be made in the best interests of the customer. SDG&E recommends that this alternative include provisions for both the off-grid solution as well as overhead distribution originating from Santa Ysabel C222 to the north.   | In order to serve existing customers at Boulder Creek substation, this alternative would either convert a 6.5-mile section of TL626 from 69 kV to 12 kV distribution, or serve the load with a local off-grid photovoltaic system. A 6.8-mile section of TL626 that is co-located with C79 would also be converted to a 12 kV fire hardened distribution line. | In order to serve existing customers at Boulder Creek Substation, this alternative would either <del>convert a 6.5 mile section of TL626 from 69 kV to 12 kV distribution, or serve the load with a local off-grid photovoltaic system.</del> <u>allow the segment of TL626 between Boulder Creek and Santa Ysabel substations to operate “as-is” for 1 year at 12 kV while the long-term viability of an off-grid solution is evaluated. If the off-grid solution is evaluated as satisfactory after 1 year, TL626 and Boulder Creek Substation would be removed. If the off-grid solution is evaluated to be unsatisfactory, SDG&amp;E would fire-harden that segment of TL626 for continued service as 12 kV as part of existing distribution line C222. The off-grid solution would potentially employ the use of photovoltaic panels, as well as energy storage and small local generation resources, to ensure reliability and power quality to the customers in this area. A 6.8-mile section of TL626 that is co-located with C79 would also be converted to a 12 kV fire-hardened distribution line.</u> |
| 2.   | ES.5.3<br>Additional Alternatives         | ES-14  | Last paragraph       | The Draft EIR/EIS includes the following sentence: “This alternative would therefore reduce HYD-4 impacts that were determined to be adverse and unavoidable under NEPA and significant and unavoidable (Class I) under CEQA to mitigated under NEPA and less than significant with mitigation under CEQA (Class II), without creating additional impacts.” This statement is incorrect – if existing access roads are removed, new permanent helicopter landing areas and footpaths will be required to access pole locations |  |   |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment #                        | Section Name   | Page # | Paragraph or Table #                       | General Comment  | Specific Comment   |  |
|----------------------------------|--|--------|--|--|--|--|
|                                  |  |        |  |  | Existing Language  | Revised Language   |
|                                  |  |        |  | for construction as well as operation and maintenance. As a result, additional impacts will be created if existing access roads are removed, and these impacts should be considered when evaluating the Partial Removal of Overland Access Roads alternative.  |  |  |
| 3.                               | ES.5.5 No Project Alternative                        | ES-16  | Third paragraph                            | The description of the No Project Alternative fails to consider the benefits to avian protection that result from the Proposed Project that would otherwise not progress as quickly under the No Project Alternative. Under this alternative, the existing lines would not be replaced with lines incorporating SDG&E's "avian-safe" design features or placed underground; any avian safety measures would be incorporated during ongoing operation and maintenance at a much slower rate and in a piecemeal fashion. |  |  |
| 4.                               | ES.6 Environmentally Superior Alternative Under CEQA | ES-17  | Environmentally Superior Alternative Table | The table included in this section states that 13 miles of TL626 would be converted to 12 kV. SDG&E requests that this table be revised to clarify that the existing portion of TL626 between Santa Ysabel and Boulder Creek substations that would be converted from 69 kV to 12 kV is approximately 8 miles in length, and that an additional approximately 5 miles extending north from Descanso Substation would be converted as well.   |  |  |
| <b>A – Introduction/Overview</b> |  |        |  |  |  |  |
| 5.                               | A.1 Introduction                                     | A-1    | Fourth paragraph                           | The third sentence of this paragraph incorrectly states that SDG&E's Proposed Project would traverse lands on the Inaja and Cosmit Indian Reservation. SDG&E's Proposed Project does not include any crossing of these lands.  | SDG&E's proposed power line replacement projects not only traverse National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverse lands managed by the Bureau of Land Management (BLM); tribal lands of the La Jolla, Campo, Inaja/Cosmit, and Viejas Indian Reservations managed by the respective tribes and held in trust by the Bureau of Indian Affairs (BIA); Cuyamaca Rancho State Park lands managed by California State Parks (CSP); lands under the jurisdiction of the City of San Diego, and private holdings within unincorporated San Diego County. | SDG&E's proposed power line replacement projects not only traverse National Forest System lands, but due to the patchwork of land ownership in the project study area, also traverse lands managed by the Bureau of Land Management (BLM); tribal lands of the La Jolla, Campo, <del>Inaja/Cosmit</del> , and Viejas Indian Reservations managed by the respective tribes and held in trust by the Bureau of Indian Affairs (BIA); Cuyamaca Rancho State Park lands managed by California State Parks (CSP); lands under the jurisdiction of the City of San Diego; and private holdings within unincorporated San Diego County. |
| 6.                               | A.3.2 Federal Proposed Action                        | A-7    | First paragraph                            | This section should clarify for the reader that the term "electrical control devices" includes utility communications components (e.g., SCADA, AMI, and similar components).   | In addition, the Forest Service proposes to authorize electrical control devices and weather stations not otherwise specified in the permit, subject to Forest Service review and approval of final design and location.   | In addition, the Forest Service proposes to authorize electrical control/ <u>communications</u> devices and weather stations not otherwise specified in the permit, subject to Forest Service review and approval of final design and location.  |
| 7.                               | A.6.5 SDG&E Permit Requirements                      | A-11   | Last paragraph                             | Permit requirements for the Proposed Project will be based on, among other things, final Proposed Project approval and design requirements. The permits listed in Table A-4 may or may not be required for the Proposed Project based on these   | SDG&E is responsible for obtaining any permits necessary for their activities. Table A-4 lists the federal, state, and local permits and authorizations required by SDG&E for the proposed project prior to  | SDG&E is responsible for obtaining any permits necessary for their activities. Table A-4 lists the federal, state, and local permits and authorizations <u>that may be required</u> by SDG&E for the proposed project  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



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|--------------------------------|---|--------|--|--|---|---|
|                                |   |        |  |  | Existing Language   | Revised Language  |
|                                |   |        |  | factors.   | construction.   | prior to construction.  |
| 8.                             | A.6.5 SDG&E Permit Requirements                   | A-12   | Table A-4 Permits or Other Actions Required by SDG&E Prior to Construction | SDG&E currently has incidental take coverage for species listed under SDG&E's NCCP and low-effect HCP for Quino checkerspot butterfly. No additional take permits are required for these species.  |   |   |
| 9.                             | A.6.5 SDG&E Permit Requirements                   | A-12   | Table A-4 Permits or Other Actions Required by SDG&E Prior to Construction | The Proposed Project will likely obtain a 1602, not 1601, Agreement from the CDFW. Additionally, the appropriate section of the California Fish and Game Code is section 1600, not 1601.   | <input type="checkbox"/> Streambed Alteration 1601 Permit   | <input type="checkbox"/> 1602 Streambed Alteration Agreement <del>1601 Permit</del>   |
| 10.                            | A.6.5 SDG&E Permit Requirements                   | A-12   | Table A-4 Permits or Other Actions Required by SDG&E Prior to Construction | The Proposed Project does not include the handling, storage, or disposal of hazardous materials in a manner that would require compliance with the regulatory requirements listed in this table for the California Department of Toxic Substances Control. SDG&E recommends removing this agency's entry from the table in its entirety. |   |   |
| 11.                            | A.6.5 SDG&E Permit Requirements                   | A-12   | Table A-4 Permits or Other Actions Required by SDG&E Prior to Construction | The California Office of Historic Preservation does not regulate paleontological resources.  | Potential to affect cultural or paleontological resources   | Potential to affect cultural or <del>paleontological</del> resources  |
| 12.                            | A.6.5 SDG&E Permit Requirements                   | A-13   | Table A-4 Permits or Other Actions Required by SDG&E Prior to Construction | The Proposed Project will not require either approvals listed for the San Diego Air Pollution Control District. SDG&E recommends removing this agency's entry from the table in its entirety.  |   |   |
| <b>B – Project Description</b> |   |        |  |  |   |   |
| 13.                            | B.3 Project Components                            | B-3    | First sentence   | The USFS has jurisdiction over only those portions of the Proposed Project that are located within the CNF.  | The electric facilities would be authorized by Forest Service standard permit 2700-4, and operations would be managed according to an Operation and Maintenance (O&M) Plan developed by SDG&E and approved by the Forest Service. | The electric facilities <u>within the CNF</u> would be authorized by Forest Service standard permit 2700-4, and operations <u>for these facilities</u> would be managed according to an Operation and Maintenance (O&M) Plan developed by SDG&E and approved by the Forest Service. |
| 14.                            | B.3.1 Applicant's Proposed Power Line Replacement | B-4    | First paragraph  | SDG&E recommends using the data provided in the POD when describing numbers of poles to be replaced, removed, or relocated, and that approximations be included due to the uncertainty regarding final design. SDG&E's Proposed Project will replace approximately 2,102 poles, not 2,104  |   |   |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                           | Page #      | Paragraph or Table #  | General Comment   | Specific Comment  |   |
|-----------|--|-------------|---|---|---|---|
|           |  |             |   |   | Existing Language   | Revised Language  |
|           | Projects                               |             |   | (718 poles on 12 kV distribution lines – the Draft EIR/EIS states 720.)   |   |   |
| 15.       | B.3.1.1 69 kV Power Line TL682         | B-5         | Table B-2 Summary of Applicant’s Proposed Power Line Replacement Projects | The CNF entry for TL626 incorrectly states that 78.0 miles of this power line is located within the CNF. This amount should be 8.0 miles.   |   |   |
| 16.       | B.3.1.1 69 kV Power Line TL682         | B-7 and B-8 | Table B-2 Summary of Applicant’s Proposed Power Line Replacement Projects | Table B-2 incorrectly states the lengths of two distribution lines to be removed (C79 should be 1.8 miles, and C449 should be 5.0 miles.) Also, the total length of distribution lines planned to be removed along C440 is 7.2 miles. |   |   |
| 17.       | B.3.1.1 69 kV Power Line TL682         | B-8         | Table B-2 Summary of Applicant’s Proposed Power Line Replacement Projects | Table B-2 incorrectly states that 441 poles will be replaced for C440; the correct number is 440.   |   |   |
| 18.       | B.3.1.1 69 kV Power Line TL682         | B-9         | Table B-2 Summary of Applicant’s Proposed Power Line Replacement Projects | Table B-2 incorrectly states that 720 poles will be replaced across all 12 kV distribution lines included in the Proposed Project. The correct number is 718.   |   |   |
| 19.       | B.3.1.4 69 kV Power Line TL629         | B-14        | Sixth paragraph   | This sentence incorrectly describes the direction which TL629 travels. Please revise as provided.   | TL629 is approximately 29.8 miles in length and runs from the Descanso Substation east to the Glencliff Substation, and then south to the Cameron Tap where the line runs both south to the Cameron Substation and west to the Crestwood Substation.  | TL629 is approximately 29.8 miles in length and runs from the Descanso Substation east to the Glencliff Substation, and then south to the Cameron Tap where the line runs both south to the Cameron Substation and <del>west</del> east to the Crestwood Substation.  |
| 20.       | B.3.1.6 12 kV Distribution Circuit C79 | B-18        | Second bullet   | Please revise as provided.  | The existing overhead C79 proposed for removal would be replaced with a new approximately 2.8-mile underground 12 kV circuit through Cuyamaca Rancho State Park from the Cuyamaca Peak communication site west in Lookout Road where it would connect to an existing overhead 12 kV distribution circuit via a new 45-foot-tall riser pole on the eastern side of SR-79 (see Figure B-13, Proposed Distribution Riser | The existing overhead C79 proposed for removal would be replaced with a new approximately 2.8-mile underground 12 kV circuit through Cuyamaca Rancho State Park from the Cuyamaca Peak communication site <del>west-east along in</del> Lookout Road where it would connect to an existing overhead 12 kV distribution circuit via a new 45-foot-tall riser pole on the eastern side of SR-79 (see Figure B-13, Proposed Distribution |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                     | Page #        | Paragraph or Table #                          | General Comment  | Specific Comment   |   |
|-----------|----------------------------------|---------------|---|--|--|---|
|           |                                  |               |   |  | Existing Language  | Revised Language  |
|           |                                  |               |   |  | Pole).   | Riser Pole).  |
| 21.       | B.3.2.1 TL626 Alternative Routes | B-24 and B-26 | Option 1 and Option 2 headings                | The existing headings for Options 1 and 2 of the Forest Service Proposed Action include the phrase “SDG&E Proposed” for each option. SDG&E did not propose these options; rather, they were requested for consideration by the USFS and CPUC. The phrase “SDG&E Proposed” should be removed for all references to these options throughout the document.   | Option 1: SDG&E Proposed Overhead Alignment through Inaja and Cosmit Reservation Lands<br>Option 2: SDG&E Proposed Overhead Alignment around Inaja and Cosmit Reservation Lands  | Option 1: <del>SDG&amp;E Proposed</del> Overhead Alignment through Inaja and Cosmit Reservation Lands<br>Option 2: <del>SDG&amp;E Proposed</del> Overhead Alignment around Inaja and Cosmit Reservation Lands   |
| 22.       | B.3.2.1 TL626 Alternative Routes | B-29          | Third paragraph (under Construction Methods)  | As SDG&E has previously noted, localized terrain along Boulder Creek Road is not conducive to the constructability of an underground electric system. The physical properties of the cable will not allow installation of conduit with radii smaller than 25 feet. It is physically impossible to obtain these minimums in areas of hairpin turns as proposed. The combination of minimum radii and slopes in excess of 12% greatly increases the likelihood of damage to the cable. |  |   |
| 23.       | B.3.2.1 TL626 Alternative Routes | B-30          | Second paragraph (under Construction Methods) | Based on other considerations provided in the Draft EIR/EIS, SDG&E’s estimate of 10- to 12-foot-deep splice vaults may not be sufficiently deep to encompass all vault locations depending on terrain, slope, or other local conditions. SDG&E recommends revising this text as provided.  | The underground concrete splice vaults would be approximately 21 feet long by 9 feet wide by 10 to 12 feet deep to facilitate the pulling and splicing of the cables, and would be installed in-line with the underground duct banks approximately every 1,000 to 1,500 feet depending on terrain, or at shorter intervals where horizontal road bends or slopes in excess of 12% grade are encountered. | The underground concrete splice vaults would be approximately 21 feet long by 9 feet wide by 10 to 12 feet deep <u>(or deeper, depending on local site conditions)</u> to facilitate the pulling and splicing of the cables, and would be installed in-line with the underground duct banks approximately every 1,000 to 1,500 feet depending on terrain, or at shorter intervals where horizontal road bends or slopes in excess of 12% grade are encountered. <u>For all underground options, ongoing maintenance would be required, which would result in necessary traffic control plans and traffic lane closures on Boulder Creek Road when accessing these vaults.</u> |
| 24.       | B.3.2.1 TL626 Alternative Routes | B-31          | Third paragraph (under Option 4)              | Option 4 may potentially require new access roads to be constructed along Boulder Creek Road, as this road is not sufficiently wide in all areas to support construction activities from the roadway shoulder or edge of road without requiring some off-road access.  |  |   |
| 25.       | B.3.2.1 TL626 Alternative Routes | B-32          | First paragraph (under Option 4)              | Pole locations for 12 kV-only replacement appear to be incorrect in this paragraph, as this proposed route extends beyond where C79 currently ends in this location. The segment of poles between Z372120 and Z372138 should be accounted for in this 12 kV-only segment for continuity because C79 currently exists along this length of the existing alignment.  |  |   |
| 26.       | B.3.2.1 TL626 Alternative        | B-32          | Paragraphs 3 and 4 (under                     | Additional fieldwork would be required to determine the engineering feasibility of Option 5. Due to engineering design and safety requirements, riser poles associated with  |  |   |

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|-----------|---|--------|----------------------|---|-------------------|------------------|
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|           | Routes  |        | Option 5)            | this option would be a minimum of 83 feet in height above ground level, and new poles constructed as part of the relocation around the Inaja Picnic Area would likely be constructed and maintained using helicopters due to a lack of existing access to this area and the steep terrain. Maintenance of riser poles and the underground system in this area would impact access to the parking area at this location during construction as well as during operation and maintenance and inspection activities. Additionally, aerial marker balls may still be required on the new alignment due to the San Diego River crossing. These impacts should be fully considered in the analysis of this alternative elsewhere throughout the document.   |                   |                  |
| 27.       | B.3.2.3 C440 Mount Laguna Underground Alternative | B-33   | Fourth paragraph     | <p>SDG&amp;E is concerned about the USFS' proposal to more than double the amount of undergrounding in the federal Proposed Action, despite the lengthy process that SDG&amp;E and the USFS undertook to identify and prioritize the 13 miles of distribution lines to be undergrounded as part of the Proposed Project. The Draft EIR/EIS does not provide a reason for the additional 14.3 miles of undergrounding at the top of Mount Laguna or identify the methodology used to determine the segments proposed for additional undergrounding.</p> <p>The Draft EIR/EIS includes substantial discussion and mitigation for potential impacts to host plants and habitat for three invertebrate species known or suspected to occur within the vicinity of C440 and the Mount Laguna Recreation Area. Because of the potential prevalence of host plants and habitat for these species in this area and the requirement to clear this vegetation if undergrounding is required, SDG&amp;E believes this alternative would not be preferable with respect to biological resources. The analysis provided in the Draft EIR/EIS regarding this alternative does not accurately reflect the potential loss of host plants and habitat for these species and should be updated accordingly.</p> <p>In addition, the area identified by the USFS for this undergrounding—the Mount Laguna Recreational Area—is known to be rich with cultural resources, including within existing roadways. SDG&amp;E has developed very stringent protocols with the USFS on ground-disturbing activities to avoid impacting cultural resources. It is anticipated that trenching for underground facilities, even within existing roadways, will negatively impact existing cultural resources. Additionally, this alternative states that all undergrounding would be within existing roads without analysis of whether this is possible due to the nature of transition between the</p> |                   |                  |

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 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



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|           |                             |        |                      | <p>underground line and customer homes/buildings. Fire hardening the existing overhead facilities will have significantly fewer impacts on these resources.</p> <p>Please provide the rationale for including this alternative in light of the potential impacts that may result. SDG&amp;E asks that the USFS reconsider and fully evaluate the potential impacts and trade-offs for this additional undergrounding.</p>   |  |   |
| 28.       | B.3.2.4 BIA Proposed Action | B-34   |                      | <p>The BIA's Proposed Action includes undergrounding and realignment to avoid certain properties within the La Jolla Indian Reservation. SDG&amp;E has been in continued discussion with the La Jolla Indian Reservation for several years on these changes outside of the Proposed Project, and this relocation is considered a mutually beneficial solution for both parties. These changes should continue through the existing and separate discussions taking place and not be incorporated into the federal Proposed Action, which would unduly transfer the costs of these changes from the La Jolla Indian Reservation to SDG&amp;E ratepayers. SDG&amp;E recommends removing the BIA Proposed Action for this reason.</p>  |  |   |
| 29.       | B.4.2 Right-of-Ways         | B-35   | First paragraph      | <p>The Draft EIR/EIS includes the statement "Outside the CNF, existing ROWs have varying widths based on individual property owner agreements." As stated in SDG&amp;E's response to CPUC Data Request 04, SDG&amp;E cannot confirm that all constructed facilities will remain in SDG&amp;E's existing right-of-way (ROW) easements. Although the intent of the Proposed Project is to rebuild the existing facilities within established ROW easements to the greatest extent possible, SDG&amp;E may incorporate design changes to improve public safety, system reliability, and environmental resource protection. Examples of this include spanning or relocating poles to avoid culturally or environmentally sensitive areas, consolidating 12 kV and 69 kV facilities to single pole construction where feasible, reducing vegetation management, and improving access. Following environmental review and during project implementation, SDG&amp;E would continue to exercise efficient design strategies within existing ROW easements in conjunction with its Land Services department who, in a cooperative effort with landowners, may acquire or revise easement rights on a case-by case-basis as well as quitclaim ROW easements of non-use when possible.</p> | <p>Outside the CNF, existing ROWs have varying widths based on individual property owner agreements.</p> | <p>Outside the CNF, existing ROWs have varying widths based on individual property owner agreements. <u>Where feasible, SDG&amp;E will construct and operate Proposed Project facilities within these existing ROWs, although revised easement rights or additional easements may be required based on the final Proposed Project design and construction. If, based on engineering requirements, existing ROWs are insufficient or unsupportable, then additional ROWs may be required. If so, SDG&amp;E would initiate negotiations for additional easement rights from the affected landowners, based upon a fair-market value appraisal. If an agreement cannot be reached, compensation would have to be determined in eminent domain proceedings.</u></p> |
| 30.       | B.4.3 Access Roads          | B-35   | Second paragraph     | <p>SDG&amp;E understands that environmental reasons (potential off movement of sediment, visual impacts, etc.) motivate eliminating access roads, but there are important employee</p>  |  |   |

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 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
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|           |  |        |  |  | Existing Language  | Revised Language   |
|           |  |        |  | safety and electric system reliability impacts that must also be considered. If existing access roads are eliminated, employees will be unable to use current practices of working on these facilities using trucks with boom and bucket access. Rather, employees would be required to hike in and climb these facilities, using hand lines for tools and equipment. In addition to introducing new crew safety hazards (such as twisted ankles, increased fall potential, shade source eliminated for heat illness situations, etc.) associated with eliminating truck access and, therefore, access to trucks, electric system reliability potentially decreases due to longer outages and more time required to complete repair work. Elimination of access roads to electric facilities would also require increased use of helicopters for ongoing operations and maintenance (O&M). It is important to consider that staging areas and intermittent landing areas will be required to perform ongoing O&M in areas where no access roads are available. Finally, not all of these roads are SDG&E-exclusive use roads, and removing them would have additional impacts on other authorized users. |  |  |
| 31.       | B.5.2.1 Temporary Work Area Requirements | B-37   | Second paragraph                       | In the event TL626 is removed from service and an off-grid solution is deemed appropriate to serve existing customers within the vicinity of Boulder Creek Substation, additional work areas will be required to accommodate construction of the off-grid solution. This additional work space has not been included in the Proposed Project but should be considered when evaluating this alternative.  |  |  |
| 32.       | B.5.2.1 Temporary Work Area Requirements | B-38   | Table B-7 Temporary Work Area Summary  | Acreage values for stringing sites associated with TL626 appear to be missing from the table.  |  |  |
| 33.       | B.5.2.1 Temporary Work Area Requirements | B-41   | Table B-7 Temporary Work Area Summary  | Acreage information for C440 Underground Duct Bank appears to include a typographical error. The correct value for acres in the Outside CNF column should be 1.3, not 13.  |  |  |
| 34.       | B.5.2.1 Temporary Work Area Requirements | B-43   | First paragraph                        | Helicopters will not follow the existing right-of-way when traveling to and from their respective airports each day and may not necessarily do so when flying to staging/fly yards for material pick-up and delivery. Please revise as provided.   | Helicopters would typically be used between 6:30 a.m. and 4:00 p.m., and their flight path would follow the ROW to the extent practicable. | Helicopters would typically be used between 6:30 a.m. and 4:00 p.m.; <u>During daily construction activities, helicopter flights would generally follow and their flight path would follow the ROW area to the extent practicable.</u> |
| 35.       | B.5.2.1 Temporary Work Area Requirements | B-43   | Second paragraph (under Staging Areas) | Please revise this sentence as provided.   | Staging areas would be accessed using public roadways and existing access roads.   | Staging areas would be accessed using public roadways and existing access roads, <u>and would be located in disturbed areas to the extent possible.</u>  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
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|---|--|--------|---|---|--|--|
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| 36.   | B.5.2.1 Temporary Work Area Requirements     | B-43   | Fourth paragraph (under Stringing Sites)                          | SDG&E has designed the Proposed Project to utilize existing public or access roads, or other disturbed areas, where possible for stringing sites to minimize potential environmental resource impacts. Please include the provided revisions to this section to clarify this point.   | Approximately 388 stringing sites would be required for installing new conductors.   | Approximately 388 stringing sites would be required for installing new conductors. <u>Where possible, SDG&amp;E has designed the Proposed Project to locate stringing sites within public roadways, existing access roads, or other previously disturbed areas to minimize potential impacts to environmental resources.</u>                                       |
| 37.   | B.5.2.2 Construction Methods                 | B-47   | Fifth paragraph (under Underground Duct Package and Installation) | Please revise this section as provided for consistency with the rest of the section.  | The underground distribution lines would be installed in a duct bank containing two to three 4-to 5-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete or placed in sand or native fill.                        | The underground distribution <del>lines</del> <u>cables</u> would be installed in a duct bank containing two to three 4-to 5-inch-diameter polyvinyl chloride (PVC) conduits encased in concrete or placed in sand or native fill.   |
| 38.   | B.5.2.2 Construction Methods                 | B-48   | First paragraph   | Splice vaults will not be completely buried, as access will need to be maintained from the surface through hand holes or other access points. This sentence should be clarified as provided.  | The splice vaults would then be connected to the underground duct banks before being covered with at least 3 feet of compacted fill.   | The splice vaults would then be connected to the underground duct banks before <del>being covered with at least 3 feet of compacted fill.</del> <u>they are surrounded with compacted or other fill, likely at the same time the rest of the trench is backfilled.</u>   |
| 39.   | B.5.2.2 Construction Methods                 | B-48   | First paragraph   | Please revise this sentence as provided.  | The remainder of the excavated material would be spread across the ROW or access roads, if possible, or disposed of at an approved facility, such as the Mountain Empire Construction and Operations (MECO) yard in Pine Valley. | The remainder of the excavated material would be spread across the ROW or access roads, if possible, or disposed of at an approved facility, <del>such as the Mountain Empire Construction and Operations (MECO) yard in Pine Valley.</del>  |
| 40.   | B.5.2.2 Construction Methods                 | B-48   | Second paragraph  | Please revise this section as provided.   | After trenching activities for the underground duct banks have been completed, the PVC cable conduits would be installed (and separated by spacers), and concrete would be poured around the conduits to form the duct banks.    | After trenching activities for the underground duct banks have been completed, the PVC cable conduits would be installed (and separated by spacers), and concrete would be poured around the conduits to form the duct banks. <u>Conduits for participating joint-trench utilities, if any, are installed at the same time using separate splicing structures.</u> |
| 41.   | B.5.2.2 Construction Methods                 | B-48   | Second paragraph  | Please revise this section as provided.   | Each cable segment would be pulled into the duct bank and terminated at the riser pole where the line converts to an overhead configuration.   | <del>Each</del> <u>Cable</u> segments would be pulled into the duct bank, <u>spliced with neighbor segments,</u> and eventually terminated at the riser pole where the line converts to an overhead configuration.   |
| <b>C – Alternatives Development and Screening</b> |  |        |   |   |  |  |
| 42.   | C.1.3 No Action Alternative – No MSUP Issued | C-2    | Second paragraph  | SDG&E believes the No Action Alternative as described in this section and evaluated in the Draft EIR/EIS is incorrectly defined. Because the “Proposed Action” is issuance of the MSUP, the No Action Alternative is no issuance of an MSUP. If no MSUP is issued, then the more than 70 individual permits for continued operation and maintenance of the existing power lines and distribution lines within the CNF boundary would be reviewed, evaluated, and renewed or terminated individually as is currently the case. Not |  |  |

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 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



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|---|--|--------|----------------------|---|---|--|
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|   |  |        |                      | issuing an MSUP would not automatically terminate the existing permits and require removal of all electric lines and facilities; these lines and facilities would simply be permitted under the existing process.   |   |  |
| 43.   | C.4.2 Removal of TL626 from Service            | C-4    |                      | This section incorrectly states that SDG&E would add a second circuit to TL6931 as part of the TL626 RS Alternative. SDG&E would fire harden the line and rebuild as a single circuit between Crestwood and Boulevard substations—no additional circuit would be added.   |   |  |
| 44.   | C.4.1 Partial Removal of Overland Access Roads | C-5    | Last paragraph       | Please provide the methodology used to calculate the 10 miles referenced for the Partial Removal of Overland Access Roads Alternative. The description states that a “terrain analysis” was conducted, but no details regarding this analysis were further provided. Additionally, the description states that “grades of 25% for appreciable distances in proximity to creeks” was used, but does not define what “appreciable distances” or “proximity to creeks” mean in this context. Please clarify.   |   |  |
| 45.   | C.4.1 Partial Removal of Overland Access Roads | C-6    | Sixth paragraph      | The statement that SDG&E would carry out maintenance activities using helicopters also necessitates the need for landing areas, pads, and foot paths if existing access roads are removed. The alternative should include impacts for the landing zones, staging areas, and foot paths.   |   |  |
| <b>D.1 – Introduction to Environmental Analysis</b> |  |        |                      |   |   |  |
| 46.   | SDG&E has no comments on this section.         |        |                      |   |   |  |
| <b>D.2 – Visual Resources</b>                       |  |        |                      |   |   |  |
| 47.   | D.2.3.3 Direct and Indirect Effects            | D.2-69 | MM VIS-1             | MM VIS-1 requires that a Scenery Conservation Plan be approved by the USFS and filed with the CPUC within 1 year after permit issuance; on page D.2-114, Table D.2-11 further defines specific locations along four 69 kV power lines and one 12 kV distribution line where individual pole treatments will be required. Because construction for the Proposed Project is anticipated to occur over an approximately 5-year period, SDG&E requests that this measure and the timing of the Scenery Conservation Plan’s completion be revised to correspond with the construction timeline for the Proposed Project. Specifically, SDG&E requests that the Scenery Conservation Plan be divided according to the individual power lines and distribution lines included in the Proposed Project, and that the proposed pole treatments and other information required under the Scenery Conservation Plan be approved by the USFS and filed with the CPUC prior to construction on the poles listed in Table | <b>Prepare and Implement a Scenery Conservation Plan.</b> Within 1 year after permit issuance, or prior to any ground-disturbing activities, SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. | <b>Prepare and Implement a Scenery Conservation Plan.</b> <del>Within 1 year after permit issuance, or prior to any ground-disturbing activities,</del> SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. <u>Each 69 kV power line or 12 kV distribution line segment will be covered under an individual section of the Plan, and each section will be reviewed and approved by the appropriate agencies prior to any ground-disturbing activities for the specific segment, such that review and approval for any segment does not impede or delay construction activities for any other segment.</u> |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



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|           |  |         |  | D.2-11 so that construction on other poles and segments not identified as requiring individual treatment not be unnecessarily delayed.  |  |   |
| 48.       | D.2.3.3 Direct and Indirect Effects                    | D.2-70  | MM VIS-1   | The text description of this measure and the information provided in Table D.2-11 are inconsistent. SDG&E recommends that text and tabular information are revised to be consistent in the Final EIR/EIS.<br><br>Additionally, Table D.2-11 lists specific poles to be addressed under this measure. The text is unclear regarding visual simulations, however, and could be interpreted as requiring visual simulations for each of the poles identified in the table. Providing visual simulations for each pole is unrealistic and unnecessary. SDG&E recommends that this measure be revised as provided. | SDG&E shall also be required to provide photorealistic visual simulations of proposed designs and mitigation measures to demonstrate their effectiveness in reducing visual contrast and prominence as viewed from sensitive viewsheds.  | SDG&E shall also be required to provide photorealistic visual simulations of <u>typical</u> proposed designs <del>and mitigation measures that include design features that may be incorporated to poles identified for visual treatment to demonstrate their</del> <u>the effectiveness of such features</u> in reducing visual contrast and prominence as viewed from sensitive viewsheds.  |
| 49.       | D.2.3.3 Direct and Indirect Effects                    | D.2-92  | MM VIS-2   | Because SDG&E has no control over the timing and implementation of this measure, additional discussion is required that prevents delays to construction as a result of this measure. Please revise as provided.   | In order to allow for existing and proposed facilities, the Forest Service will approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives. | In order to allow for existing and proposed facilities, the Forest Service will approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives. <u>Completion of the plan amendment will not unnecessarily delay issuance of the ROD nor will it impact the start of project construction.</u> |
| 50.       | D.2.9 Mitigation Monitoring, Compliance, and Reporting | D.2-114 | Table D.2-11 Mitigation Monitoring, Compliance, and Reporting – Visual Resources | Although considerations toward potential aesthetic impacts will be made during final design, SDG&E’s primary design goal is incorporating all necessary safety and engineering requirements and practices. Potential aesthetic impacts must be considered secondarily to these factors. Constructing and operating safe, reliable electric lines is the focus.  |  |   |
| 51.       | D.2.9 Mitigation Monitoring, Compliance, and Reporting | D.2-114 | Table D.2-11 Mitigation Monitoring, Compliance, and Reporting – Visual Resources | The timing for MM VIS-1 is inconsistent between the measure description and the timing field. The timing in the measure description is within 1 year after licensing or before any ground-disturbing activities. The Timing section requires MM VIS-1 before final design. SDG&E recommends revising the timing requirement for the Scenery Conservation Plan as described in the previous comments to allow for each individual line segment to be reviewed and approved separately.   |  |   |
| 52.       | D.2.9 Mitigation                                       | D.2-114 | Table D.2-11 Mitigation  | The CPUC/Forest Service Monitor line item included in this table is overly subjective and infeasible. SDG&E   | b. CPUC/Forest Service Monitor: Line item in compliance monitoring report (replacement poles   | b. CPUC/Forest Service Monitor: Line item in compliance monitoring report ( <del>replacement poles</del>  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



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|                                   | Monitoring, Compliance, and Reporting             |        | Monitoring, Compliance, and Reporting – Visual Resources | recommends revising this statement as provided.  | resemble existing poles to the extent feasible and do not dominate existing views) | <del>resemble existing poles to the extent feasible and do not dominate existing views</del> individual treatment for replacement poles identified in Location is consistent with the plan) |
| <b>D.3 – Air Quality</b>          |   |        |  |  |  |   |
| 53.                               | D.3.3.3 Direct and Indirect Effects               | D.3-21 | Impact AIR-5 and Table D.3-8                             | The discussion on this page under Impact AIR-5 states that parks and outdoor recreational facilities are not considered sensitive receptors for the purposes of air quality analyses, yet Table D.3-8 identifies Amago Sports Park as an athletic facility and sensitive land use within 1,000 feet of TL682. Amago Sports Park is an off-road motorcycle racing facility and should be removed from the table and any resulting analyses.   |  |   |
| 54.                               | D.3.4.1 TL626 Alternative Routes                  | D.3-24 | Impact AIR-1   | The analysis of an additional approximately 11.4 miles of undergrounding as part of Option 3 fails to appropriately consider or demonstrate the potential additional PM <sub>10</sub> emissions that would result from undergrounding this segment of TL626. Although the Proposed Project is within the acceptable threshold for this pollutant, undergrounding this additional length of TL626 could result in an exceedance of this threshold, and this potential should be properly modeled and analyzed as part of the discussion under Impact AIR-1.       |  |   |
| 55.                               | D.3.4.3 C440 Mount Laguna Underground Alternative | D.3-27 | Impact AIR-1   | The analysis of an additional approximately 14.3 miles of undergrounding as part of this alternative fails to appropriately consider or demonstrate the potential additional PM <sub>10</sub> emissions that would result from undergrounding this segment of C440. Although the Proposed Project is within the acceptable threshold for this pollutant, undergrounding this additional length of C440 could result in an exceedance of this threshold, and this potential should be properly modeled and analyzed as part of the discussion under Impact AIR-1. |  |   |
| <b>D.4 – Biological Resources</b> |   |        |  |  |  |   |
| 56.                               | D.4.1.4   | D.4-17 |  | The Revised Plan of Development (POD) identified certain wildlife species as having no potential to occur on certain electric lines. By contrast, the Draft EIR/EIS identified these species as having a high potential to occur or as present for those same lines. Specifically, the identification for the following species has changed: <ul style="list-style-type: none"> <li>• Quino checkerspot butterfly (TL626, TL629, C157);</li> <li>• Hermes copper butterfly (C442, C449);</li> </ul>  |  |   |

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|           |              |        |                      |   | Existing Language | Revised Language |
|           |              |        |                      | <ul style="list-style-type: none"> <li>• Arroyo toad (C78);</li> <li>• Northern red-diamond rattlesnake (C440);</li> <li>• Belding’s orange-throated whiptail (TL626, C442, C440: from none to moderate-high);</li> <li>• Southwestern willow flycatcher (TL626, C442, C449);</li> <li>• Pallid bat (C78);</li> <li>• Western red bat (C78); and</li> <li>• California leaf-nosed bat (TL629, C440).</li> </ul> <p>Similarly, the POD identified many wildlife species as having a “low potential to occur” on certain lines. The Draft EIR/EIS now identifies the species as having a moderate to high potential to occur for those same lines. Specifically, the identification for the following species have changed:</p> <ul style="list-style-type: none"> <li>• Large-blotched salamander (C157);</li> <li>• Northern red-diamond rattlesnake (C440);</li> <li>• California legless lizard (C157, C442, C449, C79, TL629, TL682, and TL6923);</li> <li>• Coastal rosy boa (C157, C440, C449, C78, C79, TL629, TL625, TL626, TL682);</li> <li>• Two-striped garter snake (C157, C442);</li> <li>• Pallid bat (C157, C440, C442, C449, C79);</li> <li>• Townsend’s big eared bat (TL682, C79, C78, C157);</li> <li>• Stephens’ kangaroo rat (C157);</li> <li>• Western red bat (TL682, C79, C157); and</li> <li>• American badger (TL682, TL625).</li> </ul> <p>Please provide the criteria for evaluating the occurrences of sensitive species, as well as the rationale and supporting data for why each species’ potential has changed from that identified in the POD.</p> |                   |                  |
| 57.       | D.4.1.4      | D.4-17 |                      | <p>The POD identified many plant species as having no potential or low potential to occur on certain lines. By contrast, the Draft EIR/EIS identified these species as having a high potential to occur or are listed as present for those same lines. Specifically, the identification for the following species has changed:</p> <ul style="list-style-type: none"> <li>• San Diego thornmint;</li> <li>• Dean’s milk vetch;</li> <li>• Jacumba milk vetch;</li> <li>• San Diego milk vetch;</li> </ul>   |                   |                  |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment  | Specific Comment  |   |
|-----------|--------------|--------|----------------------|--|---|---|
|           |              |        |                      |  | Existing Language   | Revised Language  |
|           |              |        |                      | <ul style="list-style-type: none"> <li>• Orcutt’s brodiaea;</li> <li>• Dunn’s mariposa lily;</li> <li>• Long-spined spineflower;</li> <li>• Delicate clarkia;</li> <li>• Tecate tarplant;</li> <li>• Vanishing wild buckwheat;</li> <li>• Tecate cypress;</li> <li>• Cuyamaca cypress;</li> <li>• Ramona horkelia;</li> <li>• Orcutt’s linanthus;</li> <li>• Felt-leaved monardella;</li> <li>• San Felipe monardella;</li> <li>• Gander’s butterweed;</li> <li>• Moreno currant;</li> <li>• Southern skullcap;</li> <li>• Laguna Mountains jewel-flower;</li> <li>• Southern jewelflower;</li> <li>• San Bernardino aster; and</li> <li>• Velvety false-lupine.</li> </ul> <p>Please provide the criteria for evaluating sensitive plant species occurrences, as well as the rationale and supporting data for why each species’ potential has changed from that identified in the POD.</p> |   |   |
| 58.       | D.4.2.1      | D.4-80 | First paragraph      | Please revise this paragraph as provided.  | If a jeopardy or adverse modification opinion is provided, USFWS may suggest “reasonable and prudent alternatives for eliminating the jeopardy or adverse modification of critical habitat in the opinion” or “choose to take other action if it believes, after a review of the biological opinion and the best available scientific information, such action satisfies section 7(a)(2)” (USFWS 1998).                                   | If a jeopardy or adverse modification opinion is provided, USFWS may suggest “reasonable and prudent alternatives for eliminating the jeopardy or adverse modification of critical habitat in the opinion.” <u>The action agency may choose to implement the RPA</u> or “choose to take other action if it believes, after a review of the biological opinion and the best available scientific information, such action satisfies section 7(a)(2)” (USFWS 1998). |
| 59.       | D.4.2.1      | D.4-80 | Third paragraph      | Please revise this paragraph as provided.  | The Fish and Wildlife Coordination Act (16 U.S.C. 661–666) authorizes the secretaries of Agriculture and Commerce to provide assistance to and cooperate with other federal and state agencies to protect, rear, stock, and increase the supply of game and fur-bearing animals, as well as to study the effects of domestic sewage, trade wastes, and other polluting substances on wildlife. The Act also authorizes the preparation of | The Fish and Wildlife Coordination Act (16 U.S.C. 661–666) authorizes the <u>Secretary of the Interior</u> <del>secretaries of Agriculture and Commerce</del> to provide assistance to and cooperate with other federal and state agencies to protect, rear, stock, and increase the supply of game and fur-bearing animals, as well as to study the effects of domestic sewage, trade wastes, and other polluting substances on wildlife. The Act also           |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment  | Specific Comment   |   |
|-----------|--------------|--------|----------------------|--|--|---|
|           |              |        |                      |  | Existing Language  | Revised Language  |
|           |              |        |                      |  | plans to protect wildlife resources, the completion of wildlife surveys on public lands, and the acceptance by federal agencies of funds or lands for related purposes provided that land donations receive the consent of the state in which they are located.  | authorizes the preparation of plans to protect wildlife resources, the completion of wildlife surveys on public lands, and the acceptance by federal agencies of funds or lands for related purposes provided that land donations receive the consent of the state in which they are located.   |
| 60.       | D.4.2.3      | D.4-88 | First two paragraphs | The included language regarding SDG&E's Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP) requires additional clarification. Please revise the section as provided. | <p>The SDG&amp;E NCCP was approved by the wildlife agencies in December 1995. The NCCP was developed to establish and implement a long-term agreement among CDFW, USFWS, and SDG&amp;E. The NCCP authorized take of 110 species (covered species) as a result of SDG&amp;E's development, installation, operation, and maintenance of its facilities, while providing for the conservation and preservation of sensitive species. All SDG&amp;E facilities that will be covered under the MSUP (including the proposed replacement of circuit/TLs) are currently being operated and maintained by SD&amp;E in accordance with their NCCP. After the project components are installed, the facilities will continue to be operated and maintained to be consistent with the SDG&amp;E NCCP.</p> <p>Any effect of habitat loss, habitat alteration, mortality or injury on sensitive species will be reduced through the implementation of mitigation measures incorporated into the MSUP, including use of the SDG&amp;E NCCP, raptor protection measures, and invasive plant control measures. The NCCP and other measures will be incorporated into the Operating Plan as enforceable conditions of the permit, and actions identified in the NCCP will be extended to species on the Regional Forester's Sensitive Species list.</p> | <p>The SDG&amp;E NCCP was <u>developed by SDG&amp;E to meet the requirements of FESA and the NCCPA</u>. The <u>NCCP was approved by the wildlife agencies in December 1995</u>. The NCCP was developed to establish and implement a long-term agreement among CDFW, USFWS, and SDG&amp;E. The NCCP authorizes <del>take</del> take of 110 species (covered species) as a result of SDG&amp;E's development, installation, operation, and maintenance of its facilities, while providing for the conservation and preservation of <u>the covered sensitive species</u>. <u>At the time of NCCP approval, USFWS and CDFW determined that the biological impacts to covered species resulting from covered activities were minimized and mitigated to the maximum extent practicable, and that future agency decisions could rely on the determination that impacts had been fully addressed by the NCCP's conservation measures</u>. All SDG&amp;E facilities that will be covered under the MSUP (including the proposed replacement of circuit/TLs) are currently being operated and maintained by SD&amp;E in accordance with their NCCP. After the project components are installed, the facilities will continue to be operated and maintained to be consistent with the SDG&amp;E NCCP.</p> <p>Any effect of habitat loss, habitat alteration, mortality or injury on sensitive species will be reduced through the implementation of mitigation measures incorporated into the MSUP, including use of the SDG&amp;E NCCP, raptor protection measures, and invasive plant control measures. The NCCP and other measures will be incorporated into the Operating Plan as enforceable conditions of the permit, and actions identified in the NCCP will be extended to <u>non-covered species that are</u> on the Regional Forester's Sensitive Species list.</p> |
| 61.       | D.4.3.3      | D.4-90 |                      | For all references to USFS sensitive resources and accompanying mitigation, the Final EIR/EIS should explicitly state that any elevated mitigation ratios imposed by                     |  |   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name | Page #                       | Paragraph or Table #   | General Comment   | Specific Comment   |  |
|-----------|--------------|------------------------------|------------------------|---|--|--|
|           |              |                              |                        |   | Existing Language  | Revised Language   |
|           |              |                              |                        | the USFS for impacts to USFS sensitive resources will not be required for impacts outside the CNF boundary because the USFS' jurisdiction does not extend beyond this boundary.   |  |  |
| 62.       | D.4.3.3      | D.4-94 and D.4-95 through 98 | Tables D.4-5 and D.4-6 | Tables D.4-5 and D.4-6 are missing the necessary reference information regarding the source data for these tables. Additionally, data totals between the two tables do not match. For example, Table D.4-5 shows 165.14 total acres and Table D.4-6 shows 158.04 total acres, although the two tables are described as displaying the same data of Existing, Temporary, and Permanent Vegetation Impacts.   |  |  |
| 63.       | D.4.3.3      | D.4-94                       | Table D.4-5            | Table D.4-5 includes "Existing" vegetation impacts, but it is unclear what these acreage totals include. The existing 69 kV power lines and 12 kV distribution lines do not currently impact almost 6,400 acres of vegetation communities. The "Existing" column should instead show the acres of existing structures and facilities included under the Proposed Project within each of these vegetation communities.   |  |  |
| 64.       | D.4.3.3      | D.4-94                       | Table D.4-5            | The total amount of permanent impacts provided in the table does not match what is stated in the text on page D.4-98. The number in the table for total permanent impacts for all vegetation communities is 0.48 acre. However, a permanent impact of 0.6 acre for nine sensitive vegetation communities is listed on page D.4-98. The impact to nine vegetation communities should be less than the total provided in the table.   |  |  |
| 65.       | D.4.3.3      | D.4-94                       | Table D.4-5            | The totals provided in all columns as well as in several rows of this table do not equal the sum of all numbers included the respective rows or columns. Revised totals for two of the four columns in this table were provided on the Draft EIR/EIS website, but these totals still do not equal the sum of the data provided in the table. SDG&E recommends revising this table to provide correct data for each included vegetation community, including correct totals for each row and column. |  |  |
| 66.       | D.4.3.3      | D.4-95 through 98            | Table D.4-6            | Table D.4-6's title includes Existing Impacts, but no existing impacts are included in the table.   |  |  |
| 67.       | D.4.3.3      | D.4-95 through 98            | Table D.4-6            | Please clarify how the acres of vegetation community impacts were calculated in Table D.4-6. These data differ substantially from what SDG&E provided in Table 22 of the POD.   |  |  |
| 68.       | D.4.3.3      | D.4-100                      | MM BIO-1               | This mitigation measure incorrectly references Table B-5. SDG&E believes the reference should be to the Temporary Work Area Summary, Table B-7. This mitigation measure   | <b>Confine all construction and construction-related activities to the minimum necessary area. All construction areas, access to construction areas, and</b> | <b>Confine all construction and construction-related activities to the minimum necessary area. All construction areas, access to construction areas, and</b> |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name | Page #          | Paragraph or Table # | General Comment   | Specific Comment  |  |
|-----------|--------------|-----------------|----------------------|---|---|--|
|           |              |                 |                      |   | Existing Language   | Revised Language   |
|           |              |                 |                      | should be clarified to exclude access roads from staking/flagging requirements.   | construction-related activities shall be strictly limited to the areas identified in Section B, Project Description, Table B-5. The limits of approved work spaces shall be delineated with stakes and/or flagging prior to beginning work in any area. In areas where SDG&E will not work within exclusive-use easements, SDG&E will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H). | construction-related activities shall be strictly limited to the areas identified in Section B, Project Description, Table B-5-7. The limits of approved work spaces <u>(not including existing access roads)</u> shall be delineated with stakes and/or flagging prior to beginning work in any area. In areas where SDG&E will not work within exclusive-use easements, SDG&E will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H). |
| 69.       | D.4.3.3      | D.4-100         | MM BIO-3             | Biological monitoring is effective and necessary during initial ground-disturbing and vegetation removal activities. Once a site has been cleared and developed, however, biological monitoring is generally no longer necessary with the exception of specific resource monitoring requirements. Additionally, project personnel (including monitors) may not be allowed access to lands outside of the approved project area; and biological monitoring is only necessary in undeveloped (i.e., natural) areas.   | An authorized biological monitor must be present at the construction sites during all ground-disturbing and vegetation-removal activities. The monitor shall survey the construction sites and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.  | An authorized biological monitor must be present at the construction sites during all <u>initial</u> ground-disturbing and vegetation-removal activities <u>in undeveloped areas</u> . The monitor shall survey the construction <u>project footprint sites and surrounding areas</u> for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.  |
| 70.       | D.4.3.3      | D.4-100 and 101 | MM BIO-4             | All temporary work areas will be returned to near pre-construction conditions in accordance with SDG&E NCCP 7.2 Habitat Enhancement Measures. Similarly, compensation for impacts should be consistent with the approved ratios defined in the NCCP.<br><br>The approval timeline and approving agencies for this measure are unclear due to redundancy with MM BIO-11; language variations in the mitigation measures are open to interpretation and should be clarified for consistency. Additionally, "permitting agencies" should be defined to clearly delineate the reporting requirements for these measures. MM BIO-4 needs to be clearly tied to MM BIO-11, as opposed to MM BIO-5, since there are redundancies with MM BIO-11 and MM BIO-5 that may not be | All temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and Forest Service) who will oversee implementation of the HRP. The HRP will be reviewed and approved by the CPUC and Forest Service prior to implementation. Restoration techniques may include the following: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered  | All <u>previously undisturbed</u> temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be <del>revegetated with native species characteristic of the adjacent native vegetation communities</del> <u>returned to near pre-construction conditions</u> in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures <u>and consistent with current SDG&amp;E practices</u> . <del>The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and Forest Service) who will oversee implementation of the HRP. The HRP will be reviewed and approved by the CPUC and Forest Service prior to implementation. Restoration techniques may include</del>   |

| Comment # | Section Name | Page #           | Paragraph or Table # | General Comment   | Specific Comment  |  |
|-----------|--------------|------------------|----------------------|---|---|--|
|           |              |                  |                      |   | Existing Language   | Revised Language   |
|           |              |                  |                      | <p>applicable.</p> <p>Topsoil salvage may not be feasible or desirable in some areas (e.g., in existing areas of weed infestation).</p> <p>SDG&amp;E has revised this measure to more accurately describe the existing NCCP enhancement program, which includes the practices to be used in creating the Proposed Project's Habitat Restoration Plan. Additionally, redundant or inapplicable information, such as the California Desert Native Plant Act, and incorrect mitigation ratios have been removed.</p>   | <p>desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process for use in the restoration. Wherever possible, vegetation would be left in place to avoid excessive root damage to allow for natural recruitment following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the permitting agencies, the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-5).</p> | <p><del>the following: hydroseeding, hand seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site.</del> Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process <u>to the extent feasible</u> for use in the restoration <u>of sites requiring restoration</u>. Wherever possible, vegetation <del>would</del> <u>will</u> be left in place <u>or mowed</u>, and not grubbed, per the NCCP to avoid excessive root damage and allow for natural <del>recruitment</del> <u>regrowth</u> following construction. Temporary impacts shall be restored sufficient to compensate for the impact <del>to the satisfaction of the permitting agencies (depending on the location of the impact)</del> <u>in accordance with the NCCP Habitat Enhancement Measures</u>. If restoration of temporary impact areas <del>is not possible to the satisfaction of the permitting agencies</del> does not meet success criteria per the HRP, the temporary impact shall be <del>considered a permanent impact and compensated accordingly (see MM BIO-5)</del> <u>mitigated for per the NCCP</u>.</p> |
| 71.       | D.4.3.3      | D.4- 101 and 102 | MM BIO-5             | <p>This measure is unclear and requires additional clarification. If a permanent impact can be restored, then it is a temporary impact and not a permanent impact. Restoration is not possible for permanent impacts. SDG&amp;E recommends revising the title of this measure accordingly.</p> <p>Please specify whether the measure proposes that habitat restoration of existing impacts elsewhere (associated with road closures, for example) can compensate for permanent project impacts. If the measure is referring to off-site habitat restoration as compensatory mitigation then the HRP and MM BIO-4 are not applicable.</p> <p>SDG&amp;E selects and places a preference on work areas in disturbed habitat, bare ground, and pavement as part of the NCCP's USFWS- and CDFW-approved avoidance and minimization measures. For the Proposed Project, SDG&amp;E underwent substantial design review and enhancement in cooperation with the CPUC and USFS to identify potential temporary work areas; locate these areas on existing public roadways or access roads, areas of disturbed vegetation, or</p> | <p><b>Provide habitat compensation or restoration for permanent impacts to native vegetation communities.</b> Permanent impact to all native vegetation communities shall be compensated through a combination habitat compensation and habitat restoration at a minimum of a 1:1 ratio and in accordance with SDG&amp;E NCCP 7.4 Mitigation Credits or as required by the permitting agencies. Where discrepancies occur, the higher of the two ratios will be applied, but these ratios are not additive (i.e., ratios of 1:1 and 2:1 do not equal 3:1. Mitigation would be applied at the 2:1 ratio only). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland. "Disturbed" habitat is to be mitigated per ratio for the surrounding vegetation. Habitat compensation shall be accomplished through</p>                                       | <p><b>Provide habitat compensation or restoration for permanent impacts to native vegetation communities.</b></p> <p><u>5(a) SDG&amp;E has satisfied all mitigation obligations for ESA resources by complying with the NCCP; these obligations will be discussed separately from other mitigation requirements (e.g., USFS sensitive species resources) and are not included under this mitigation measure. Permanent I Impacts to all native vegetation communities resulting from construction of the Proposed Project shall will be compensated for through a combination habitat compensation and habitat restoration at a minimum of a 1:1 ratio and in accordance with SDG&amp;E NCCP 7.4 Mitigation Credits or as required by the permitting agencies. Where discrepancies occur, the higher of the two ratios will be applied, but these ratios are not additive (i.e., ratios of 1:1 and 2:1 do not equal 3:1. Mitigation would be applied at the 2:1 ratio only). Impacts to vegetation</u></p>   |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment   | Specific Comment   |  |
|-----------|--------------|--------|----------------------|---|--|--|
|           |              |        |                      |   | Existing Language  | Revised Language   |
|           |              |        |                      | <p>urban/developed areas (such as gravel or paved off-road areas); and minimize to the fullest extent possible the amount of temporary workspace required within the CNF boundary. Disturbed habitat is not a functional ecological system and provides no value to wildlife. Per the NCCP, SDG&amp;E is not required to mitigate for temporary impacts in these areas and will continue to follow this approved practice as outlined in Table 7.4 of the NCCP.</p> <p>SDG&amp;E proposes to use the established, approved enhancement program described in and implemented by the NCCP, which includes approved mitigation ratios, approaches, and success criteria. The ratios included in this measure are higher than what was previously approved by USFWS and CDFW under the NCCP and therefore should not apply. The ratios in the NCCP supersede the ratios included in this document.</p> <p>This measure and the accompanying text provide a range of mitigation ratios but do not provide the corresponding regulatory driver for each ratio, the difference in ratios between temporary and permanent impacts, or how the ratios correspond to these varying factors. Further, the Draft EIR/EIS does not explain how mitigation called for under the ratios in this measure correlate and are exempted from or considered in the mitigation ratios and acreages provided for temporary and permanent impacts to other environmental resources such as USACE jurisdictional waters and wetlands and Preserve areas. Where SDG&amp;E is required to mitigate for impacts to ESA species under the NCCP, for example, additional mitigation for this species should not be required if the species is also listed as a USFS sensitive species. SDG&amp;E has provided a table as an attachment to these comments that includes a structure for clearly delineating how temporary and permanent impacts and the corresponding mitigation ratios and acreages were derived, and for identifying the regulatory authority for those mitigation ratios and acreages. SDG&amp;E asks that this table be completed with references to any data used, and that the completed table be included in the Final EIR/EIS.</p> <p>Additionally, this measure should apply to construction activities only because operation and maintenance activities have been demonstrated to be the same in nature and scope as those that are currently performed for the existing lines. Because these activities are currently conducted, they are considered part of the baseline condition and should not be considered when mitigating for impacts. This measure should clarify that it applies only to construction activities.</p> | <p>agency-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the proposed power line replacement projects. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on private lands shall include long-term management and legal protection assurances.</p> | <p><del>communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland. Temporary impacts to “Disturbed” habitat, urban/developed areas, and other similar areas with little to no habitat potential as described in the NCCP will not be mitigated for per ratio for the surrounding vegetation NCCP practices. Final mitigation totals will be based on actual impacts determined at post construction per standard NCCP practices. Final numbers will be addressed in the NCCP annual report. Habitat restoration may be appropriate as compensation for temporary impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4.</del></p> <p><u>5(b) Per current practices agreed upon between CNF and SDG&amp;E, SDG&amp;E shall mitigate for all permanent impacts to habitat on CNF land at a 2:1 ratio. Habitat compensation will be accomplished through the payment to the USFS of a mitigation fee for the purpose of purchasing agency approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the proposed power line replacement projects. Land preservation or mitigation fee payment for habitat compensation A surety or other financial guarantee of payment (e.g., letter of credit) must be in place within 1836 months of permit issuance initiation of construction, subject to agency approval. A bond would only be required if SDG&amp;E’s credit rating falls below investment grade. Final mitigation totals will be based on actual impacts determined following construction completion. must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on public lands shall be located in</u></p> |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name | Page #             | Paragraph or Table #           | General Comment   | Specific Comment   |  |
|-----------|--------------|--------------------|--------------------------------|---|--|--|
|           |              |                    |                                |   | Existing Language  | Revised Language   |
|           |              |                    |                                | This measure should be revised to more clearly differentiate between ESA obligations, which have been satisfied per the NCCP with the exception of Laguna Mountains Skipper, and other drivers such as USFS sensitive species. The NCCP satisfies ESA resource issues on federal lands, and additional proposed ESA requirements are not applicable. MM BIO-5 should also be revised to include two separate sections that clearly outline the two resource types and the corresponding mitigation.   |  | areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on private lands shall include long-term management and legal protection assurances.   |
| 72.       | D.4.3.3      | D.4-103            | First paragraph                | This paragraph does not distinguish between temporary and permanent impacts. Additionally, the NCCP provides mitigation requirements that will be followed for permanent impacts to vegetation communities, consistent with MM BIO-5. As a result, these statements should be removed.  | If impacted, redshank chaparral will be mitigated at a ratio of 1:1 and Great Basin sage scrub will be mitigated at a ratio of 2:1 (County of San Diego 2010). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland.   | If impacted, redshank chaparral will be mitigated at a ratio of 1:1 and Great Basin sage scrub will be mitigated at a ratio of 2:1 (County of San Diego 2010). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland.   |
| 73.       | D.4.3.3      | D.4-103            | MM BIO-8(b)                    | This measure requires additional Biological Assessments/Biological Evaluations for certain operation and maintenance work that may occur within the Limited Operating Period for USFS-sensitive species. SDG&E currently provides to the USFS a Pre-activity Survey Report (PSR) for its review and approval. The PSR addresses USFS-sensitive species and references the existing, approved SDG&E Permits Biological Assessment/Biological Evaluation (BA/BE) (February 2006; 2010). SDG&E also schedules and conducts surveys for, and submits evaluations prior to, executing work on the existing lines according to the established and approved procedure. MM BIO-8(b) introduces a duplicative and unnecessary procedure. Operation and maintenance of the Proposed Project will not increase or substantially alter the activities currently required for these existing lines. As a result, existing operation and maintenance activities should be considered part of the Proposed Project baseline and not considered for impacts as part of the Proposed Project. SDG&E therefore recommends using the existing, approved PSR procedure and removing MM BIO-8(b) in its entirety. | <b>Biological evaluation/biological assessment.</b> Operation and maintenance activities involving pole replacement (primary and secondary poles), re-stringing lines, facility replacement or major remodel construction, atypical brush management or tree clearing (i.e., brush and trees that have not been managed before), road maintenance beyond the existing limits, maintenance that may affect wetlands or waters of the U.S., and maintenance that may occur within the Limited Operating Period (LOP) for Forest Service species (e.g., golden eagle, spotted owl, bald eagle, arroyo toad) will require the submittal of a Biological Evaluation/Biological Assessment (BE/BA) to the Forest Service for approval (see Appendix BIO 7 for an example). ... | <b>Biological evaluation/biological assessment.</b> Operation and maintenance activities involving pole replacement (primary and secondary poles), re-stringing lines, facility replacement or major remodel construction, atypical brush management or tree clearing (i.e., brush and trees that have not been managed before), road maintenance beyond the existing limits, maintenance that may affect wetlands or waters of the U.S., and maintenance that may occur within the Limited Operating Period (LOP) for Forest Service species (e.g., golden eagle, spotted owl, bald eagle, arroyo toad) will require the submittal of a Biological Evaluation/Biological Assessment (BE/BA) to the Forest Service for approval (see Appendix BIO 7 for an example). ... |
| 74.       | D.4.3.3      | D.4-105 though 108 | Table D.4-7 and Preserve Areas | SDG&E's NCCP was approved by USFWS and CDFW. Section 5 of the NCCP, titled "Relations to Other Regional Habitat Conservation Plans," and the Implementing Agreement for the NCCP are independent of other regional habitat conservation plans such as San Diego County's Multiple Species Conservation Plan (MSCP). As a result, any potential impacts within the MSCP area will be avoided and   |  |  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name | Page #              | Paragraph or Table # | General Comment  | Specific Comment  |                  |
|-----------|--------------|---------------------|----------------------|--|-------------------|------------------|
|           |              |                     |                      |  | Existing Language | Revised Language |
|           |              |                     |                      | mitigated for under the practices and procedures defined in Section 6 and 7 of the NCCP, which cover SDG&E activities within habitat conservation plan preserves and mitigation, respectively. Table D.4-7 and the Preserve Areas section should be revised accordingly.   |                   |                  |
| 75.       | D.4.3.3      | D.4-105 through 107 | Table D.4-7          | Table D.4-7 does not include any references for the data included in the table. Additionally, the data included in the table do not sum correctly to the subtotals or grand totals included in the table. Please correct the calculations and provide reference information for the data included in this table.   |                   |                  |
| 76.       | D.4.3.3      | D.4-108             | Preserve Areas       | <p>This section is unclear and leads the reader to believe that SDG&amp;E will be required not only to follow the mitigation ratios in NCCP Table 7.4 but also to obtain additional mitigation for CNF lands at either a 2:1 or 3:1 ratio. Although the section specifically states that mitigation ratios are not additive, it does not clarify that additional mitigation for CNF lands is not required for impacts to a Preserve Area that is also a sensitive vegetation community or USACE-jurisdictional area. As a result, this section, when considered in the context of the larger Draft EIR/EIS, could be interpreted to require total mitigation that is much higher than the ratios under the NCCP, or that impacts to the same physical space may have to be mitigated for separately under multiple regulatory authorities. As described in SDG&amp;E's comments on MM BIO-5, SDG&amp;E requests that the Final EIR/EIS include a table showing the acreage, type of impact, and regulatory authority for each required mitigation ratio so that the reader can understand how the total mitigation requirements were determined.</p> <p>Compensation for impacts to sensitive vegetation located within Preserve Areas is redundant since MM BIO-4 and MM BIO-5 already address compensation for impacts to sensitive vegetation. In addition, the NCCP supersedes the MSCP.</p> <p>This section states that SDG&amp;E must mitigate for a total of 447 acres, which appears to be more than double what SDG&amp;E identified in the POD. The POD explained that the impacts identified in that document reflected a worst-case estimate to analyze the maximum impacts that could potentially result from implementation of the Proposed Project. In the POD, SDG&amp;E identified the maximum area needed for work spaces, in light of terrain or other factors, because SDG&amp;E did not want to underestimate impacts for evaluation purposes. In practice, SDG&amp;E's as-built work</p> |                   |                  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #        | Paragraph or Table #          | General Comment  | Specific Comment  |  |
|-----------|-----------------------------|---------------|-------------------------------|--|---|--|
|           |                             |               |                               |  | Existing Language   | Revised Language   |
|           |                             |               |                               | spaces will be typically smaller than the estimates in the POD.<br>As part of the design process, SDG&E identified potential impacts to sensitive resources and will reshape each work area according to individual site constraints and limitations. Consistent with the NCCP, SDG&E avoids and minimizes impacts to the greatest extent feasible during construction.<br>Once work is completed and as a standard practice, SDG&E produces a post-construction report and bases all compensatory mitigation off actual, as-built impacts. As this section is currently written, SDG&E will not be allowed the opportunity to engage these standard, approved practices if SDG&E must obtain mitigation within 18 months of permit issuance. This 18-month requirement should be removed.<br>Finally, it appears in this section that SDG&E is required to mitigate for all impacts, including when work areas are in existing access roads, disturbed areas, paved areas, agricultural fields, and other habitat types that do not require mitigation under the NCCP. These discrepancies should be corrected to account for the NCCP. |   |  |
| 77.       | D.4.3.3                     | D.4-109       | Last paragraph                | If impacts to Preserve Areas are not adverse and Class III under the California Environmental Quality Act, it is not clear why compensation for 448.58 acres from the SDG&E mitigation bank for impacts to sensitive habitat types located within Preserve Areas is necessary. Please clarify.   |   |  |
| 78.       | D.4.3 Environmental Effects | D.4-110       | Second and third paragraphs   | Please revise these paragraphs as provided.  | Table D.4-8 describes the potential temporary and permanent impacts to RCAs. Approximately 89 existing poles have been identified for replacement from RCAs as part of SDG&E's proposed project. As shown in Table D.4-8, SDG&E's proposed project will temporarily impact approximately 8.76 acres and permanently impact 0.05 acre of the 2,962 <sup>20</sup> currently identified acres of RCAs from construction of the replacement steel poles.<br>In addition to RCAs, approximately 200 water crossings are within SDG&E's proposed project study area. <sup>21</sup><br>... | Table D.4-8 describes the potential temporary and permanent impacts to RCAs. Approximately 89 existing poles have been identified for replacement <del>from within</del> RCAs as part of SDG&E's <del>pp</del> Proposed <del>P</del> project. As shown in Table D.4-8, SDG&E's proposed project will temporarily impact approximately 8.76 acres and permanently impact 0.05 acre of the 2,962 <sup>20</sup> currently identified acres of RCAs from construction <del>activities during of the</del> replacement <del>of the</del> steel poles.<br>In addition to RCAs, approximately 200 water crossings are <u>located</u> within SDG&E's proposed project study area. <sup>21</sup><br>... |
| 79.       | D.4.3 Environmental Effects | D.4-110 - 120 | Text and Tables D.4-8,9,10&11 | Throughout the document, it needs to be made clear that values given for impacts to jurisdictional resources are only estimates based on current Proposed Project design and information collected to date.  |   |  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #        | Paragraph or Table #   | General Comment  | Specific Comment  |  |
|-----------|-----------------------------|---------------|--|--|---|--|
|           |                             |               |  |  | Existing Language   | Revised Language   |
| 80.       | D.4.3 Environmental Effects | D.4-111       | Table D.4-8 Power Line Replacement Projects Temporary and Permanent Impacts to Riparian Conservation Areas | Please update the title of this table as provided.   | Table D.4-8 Power Line Replacement Projects Temporary and Permanent Impacts to Riparian Conservation Areas  | Table D.4-8 Power Line Replacement Projects <u>Potential</u> Temporary and Permanent Impacts to Riparian Conservation Areas  |
| 81.       | D.4.3 Environmental Effects | D.4-111       | Table D.4-8 Power Line Replacement Projects Temporary and Permanent Impacts to Riparian Conservation Areas | Please add the footnote provided to this table.  | 1 Temporary construction impacts involve the following: direct bury, fly yard and staging areas, micropile, removal, and stringing sites (for a detailed description see Section B, Project Description).<br>2 Permanent construction impacts involve the following: direct bury and micropile (for a detailed description see Section B, Project Description).         | 1 Temporary construction impacts involve the following: direct bury, fly yard and staging areas, micropile, removal, and stringing sites (for a detailed description see Section B, Project Description).<br>2 Permanent construction impacts involve the following: direct bury and micropile (for a detailed description see Section B, Project Description).<br><u>3 Both temporary and permanent impacts to RCAs may be further reduced during project design revisions.</u>   |
| 82.       | D.4.3 Environmental Effects | D.4-111       | First paragraph  | Please revise this statement as provided.  | Although RCA mapping for SDG&E's proposed project is used to describe potential impacts, MM BIO-10 requires jurisdictional mapping prior to construction and provides measures to mitigate effects to RCAs and water crossings.   | Although RCA mapping for SDG&E's proposed project is used to describe potential impacts, MM BIO-10 requires jurisdictional <u>habitat</u> mapping prior to construction and provides measures to mitigate effects to RCAs and water crossings.   |
| 83.       | D.4.3 Environmental Effects | D.4-114 - 119 | Text and Tables D.4-9,10&11  | At this stage for the Proposed Project, waters and wetlands impact areas are estimates. Acreages should not be reported down to 0.001 or this scale. Estimates this small should be reported as <0.01.   |   |  |
| 84.       | D.4.3 Environmental Effects | D.4-114       | Impact BIO-4   | Please remove all reference to vernal pools, coastal waters, and coastal wetlands, such as in Impact Bio-4 on page D.4-114. These types of resources will not be impacted as part of the Proposed Project.<br>Additionally, "pole replacement activities and maintenance of the existing access road system" better describes the Proposed Project. Please revise this text as provided. | <b>Impact BIO-4</b> Result in effects to jurisdictional waters, including federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through vegetation removal, placement of fill, erosion, sedimentation, hydrological interruption, degradation of water quality, or other means | <b>Impact BIO-4</b> Result in effects to jurisdictional waters, including federally protected wetlands as defined by Section 404 of the Clean Water Act ( <del>including but not limited to marsh, vernal pool, coastal, etc.</del> ) through vegetation removal, placement of fill, erosion, sedimentation, hydrological interruption, degradation of water quality, or other means <u>due to pole replacement activities and maintenance of the existing access road system.</u> |
| 85.       | D.4.3 Environmental Effects | D.4-116       | Table D.4-9  | Please revise the footnote to this table, as provided, for clarity and accuracy.   | 1 Jurisdictional resources further described in SDG&E (2013: Table 27, 28, and 31). Formal jurisdictional delineations were not conducted. Informal surveys for jurisdictional resources were only conducted in some areas due to access issues (SDG&E 2013).   | 1 Jurisdictional resources further described in SDG&E (2013: Table 27, 28, and 31). <del>Formal jurisdictional delineations were not conducted. Informal surveys for jurisdictional resources were only conducted in some areas due to access issues</del> <u>Jurisdictional impact values are estimates based on current project designs and</u>  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #  | Paragraph or Table # | General Comment   | Specific Comment  |   |
|-----------|-----------------------------|---------|----------------------|---|---|---|
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|           |                             |         |                      |   |   | <u>jurisdictional delineations completed as of the issuance of this Draft EIR/EIS. Partial jurisdictional delineation data sets are currently being updated by SDG&amp;E consistent with project design changes.(SDG&amp;E 2013).</u>   |
| 86.       | D.4.3 Environmental Effects | D.4-116 | First paragraph      | Please revise this paragraph as provided; the existing information is not accurate. | As listed in Table D.4-9, power lines proposed to be replaced traverse jurisdictional resources. During biological surveys, assessment of potential jurisdictional wetlands and waters of the United States for all project areas was not conducted. However, assessments for potentially jurisdictional wetlands or waters of the United States (based on the presence of hydrophytic vegetation, ordinary high water mark (OHWM), connectivity to blue-line drainages, and hydrology) was assessed during hydrological studies for some project areas. Assessments were not made for all project areas due to access issues. However, a wetland delineation (in accordance with the 1987 ACOE Wetland Delineation Manual) was not performed during these assessments. A further description of this effort is provided in the SDG&E Revised Plan of Development (SDG&E 2013, see Section 10.4 Hydrology). A formal jurisdictional delineation would be required prior to project implementation by the various regulatory agencies to determine if permitting would be necessary. | As listed in Table D.4-9, power lines proposed to be replaced traverse jurisdictional resources. <del>During biological surveys, assessment of potential jurisdictional wetlands and waters of the United States for all project areas was not conducted. However, assessments for potentially jurisdictional wetlands or waters of the United States (based on the presence of hydrophytic vegetation, ordinary high water mark (OHWM), connectivity to blue-line drainages, and hydrology) was assessed during hydrological studies for some project areas. Assessments were not made for all project areas due to access issues. However, a wetland delineation (in accordance with the 1987 ACOE Wetland Delineation Manual) was not performed during these assessments.</del> <u>Jurisdictional habitat impact values presented in this table are estimates based on current Proposed Project design and information collected as of the issuance of the Draft EIR/EIS. Jurisdictional delineations for federal and State waters and wetlands have been completed for the majority of Proposed Project work areas. The Proposed Projects' preliminary jurisdictional delineation is anticipated to be finalized by the end of 2014, and all required permits pertaining to waters and wetlands will be obtained before construction commences on construction segments requiring such permits. A further description of this effort is provided in the SDG&amp;E Revised Plan of Development (SDG&amp;E 2013, see Section 10.4 Hydrology). A formal jurisdictional delineation would be required prior to project implementation by the various regulatory agencies to determine if permitting would be necessary.</u> |
| 87.       | D.4.3 Environmental Effects | D.4-117 | First paragraph      | Please revise this paragraph as provided.   | ... As further described in Section D.9, Hydrology and Water Quality, of this EIR/EIS, stormwater runoff and non-stormwater discharges (e.g., water for dust control, groundwater dewatering discharges, and/or drilling muds) during construction could result in increased levels of turbidity (i.e., sediment) and other common construction-related contaminants to local rivers, creeks, or other water bodies under federal or state jurisdiction.  | ... As further described in Section D.9, Hydrology and Water Quality, of this EIR/EIS, stormwater runoff and non-stormwater discharges (e.g., water for dust control, groundwater dewatering discharges, and/or drilling muds) during construction could result in increased levels of turbidity (i.e., sediment) <del>and other common construction-related contaminants</del> to local rivers, creeks, or other water bodies under federal <u>and/or state jurisdiction. SDG&amp;E construction practices within and outside the CNF will be consistent with the State</u>  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #  | Paragraph or Table #     | General Comment  | Specific Comment  |   |
|-----------|-----------------------------|---------|--------------------------|--|---|---|
|           |                             |         |                          |  | Existing Language   | Revised Language  |
|           |                             |         |                          |  | ...   | <u>General Stormwater Construction Permit (CGP) and an approved SWPPP. Construction and post-construction BMPs will be installed and maintained within the CNF consistent with the SWPPP and Forest Service requirements.</u><br>...  |
| 88.       | D.4.3 Environmental Effects | D.4-117 | Second paragraph         | Please revise this paragraph as provided.  | Numerous drainages or features, potentially subject to ACOE, CDFW, and RWQCB jurisdiction, are located within SDG&E's proposed project area. Table D.4-10 describes temporary and permanent impacts to ACOE jurisdictional resources, and Table D.4-11 describes temporary and permanent impacts to wetland resources. Data for CDFW and RWQCB was not available. As described in Section D.4.1.3, several proposed work areas were not assessed for jurisdictional resources due to limited access. Approximately 118 poles and 2 stringing sites outside of the CNF were not surveyed for potentially jurisdictional wetlands or waters of the United States (SDG&E 2013, see Tables 19 and 33). However, data for known impacts are described below. | Numerous <del>drainages or features,</del> <u>aquatic resources</u> potentially subject to <del>ACOE</del> <u>USACE</u> , CDFW, and RWQCB jurisdiction, are located within SDG&E's <del>Proposed Project</del> <u>Project</u> area. Table D.4-10 <del>describes</del> <u>provides estimates for</u> temporary and permanent impacts to <del>ACOE USACE</del> -jurisdictional resources, <del>and Table D.4-11 describes temporary and permanent impacts to wetland resources including all waters and wetlands potentially under USACE jurisdiction. Data for CDFW and RWQCB was not available.</del> As described in Section D.4.1.3, <u>these estimates are based on current Proposed Project designs and jurisdictional resources information collected as of the issuance of the Draft EIR/EIS.</u> <del>several proposed work areas were not assessed for jurisdictional resources due to limited access. Approximately 118 poles and 2 stringing sites outside of the CNF were not surveyed for potentially jurisdictional wetlands or waters of the United States (SDG&amp;E 2013, see Tables 19 and 33). However, data for known impacts are described below.</del> |
| 89.       | D.4.3 Environmental Effects | D.4-117 | Table D.4-10             | Please clarify whether the estimated impacts in Table D.4-10 are to all Clean Water Act Section 404 jurisdictional resources (i.e., federal waters and wetlands) or just to non-wetland waters of the United States.   |   |   |
| 90.       | D.4.3 Environmental Effects | D.4-118 | Table D.4-11             | Please clarify whether the estimated impacts in Table D.4-11 are to three-parameter wetlands, or whether "wetland" is used as a generic term including riparian areas, isolated wetlands, waters of the state, etc. The values in this table are higher than the values in Table D.4-10 (ACOE Jurisdictional Resources). "Wetlands" under the USACE definition are a subset of USACE jurisdictional resources. The higher numbers would then not make sense. |   |   |
| 91.       | D.4.3 Environmental Effects | D.4-118 | Tables D.4-10 and D.4-11 | SDG&E recommends combining these two tables to report potential total project impacts to federal waters of the United States, including wetlands. This presents a clearer picture of the Proposed Project's potential total impacts to federally regulated water resources and creates the baseline for a USACE permit application for the Proposed Project. Impacts   |   |   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #              | Paragraph or Table #                        | General Comment   | Specific Comment  |   |
|-----------|-----------------------------|---------------------|---|---|---|---|
|           |                             |                     |   |   | Existing Language   | Revised Language  |
|           |                             |                     |   | <p>under the Regional Water Quality Control Board's and California Department of Fish and Wildlife's jurisdiction are assumed to be slightly higher numbers based on the expanded jurisdiction of these agencies. The combined table is presented as an attachment to this comment table.</p> <p>Also, reporting potential impacts in thousandth of an acre increments is not appropriate as discussed in comments to Table D.4-9. The revised table summarizes potential impacts in hundredth of an acre increments and removes the square footage calculations.</p> |   |   |
| 92.       | D.4.3 Environmental Effects | D.4-118.            | First and second paragraphs                 | <p>The following reference, and other similar references, should be removed: "Additional temporary impacts occurring during construction may include impacting water quality by land disturbances, spills, leaks, releasing pollutants into jurisdictional waters, or stormwater discharges. Temporary impacts may also occur as a result of stormwater runoff or non-stormwater discharges into local rivers, creeks, or other water bodies." SDG&amp;E will implement best management practices (BMPs) to prevent such occurrences.</p>                             | <p>Temporary impacts associated with the pole removal and replacement activities include access to the poles and workspace around the poles. Additional temporary impacts occurring during construction may include impacting water quality by land disturbances, spills, leaks, releasing pollutants into jurisdictional waters, or stormwater discharges. Temporary impacts may also occur as a result of stormwater runoff or non-stormwater discharges into local rivers, creeks, or other water bodies. Additional potential temporary impacts may occur if construction is conducted during the rainy season, within erosion-prone soils, and/or within sediment-sensitive watersheds or 303(d)-listed water bodies which may adversely affect downstream beneficial uses and violate RWQCB water quality objectives. Water for the purposes of dust-control and minimal earthwork activities (e.g., concrete mixing for installation of micro-pile foundations) and potentially impact groundwater supply if long term water demands are only obtained from on-site sources. All water quality concerns are described in more detail in Section D.9, Hydrology and Water Quality.</p> <p>The replacement of poles and removal of pole butts will occur within the same workspace. Steel plates and a temporary bridge are anticipated to be used to span jurisdictional areas to provide temporary access during construction.</p> | <p>Temporary impacts associated with the pole removal and replacement activities include access to the poles and workspace around the poles. <del>Additional temporary impacts occurring during construction may include impacting water quality by land disturbances, spills, leaks, releasing pollutants into jurisdictional waters, or stormwater discharges. Temporary impacts may also occur as a result of stormwater runoff or non-stormwater discharges into local rivers, creeks, or other water bodies.</del> Additional potential temporary impacts may occur if construction is conducted during the rainy season, within erosion-prone soils, and/or within sediment-sensitive watersheds or 303(d)-listed water bodies which may adversely affect downstream beneficial uses and violate RWQCB water quality objectives. Water for the purposes of dust-control and minimal earthwork activities (e.g., concrete mixing for installation of micro-pile foundations) and potentially impact groundwater supply if long term water demands are only obtained from on-site sources. All water quality concerns are described in more detail in Section D.9, Hydrology and Water Quality.</p> <p>The replacement of poles and removal of pole butts will occur within the same workspace. Steel plates and <del>a temporary bridges</del> are anticipated to be used to span jurisdictional areas <u>to minimize impacts to provide while providing</u> temporary access during construction.</p> |
| 93.       | D.4.3 Environmental Effects | D.4-118 and D.4-119 | Third paragraph and continuation on D.4-119 | <p>Please revise this section as provided for clarity and accuracy.</p>   | <p>A total of 0.21 acre of temporary impacts to ACOE jurisdictional resources are anticipated to occur as a result of work in all lines except C79 and C157 (Table D.4-10). Temporary impacts to CDFW and/or RWQCB resources may also occur as a result of construction components described above (Table D.4-11). A total of 1.75 acres of temporary impacts to wetland resources would occur as a result of work in</p>   | <p><del>An estimated total of 0.21 acre of temporary impacts to ACOE USACE-jurisdictional resources waters of the US</del> are anticipated to occur as a result of work <del>in</del> on all lines except C79 and C157 (Table D.4-10). <u>A total of 1.75 acres of temporary impacts to USACE-jurisdictional wetlands are anticipated to occur as a result of the current Proposed Project design for TL625, TL626, TL629, and TL682.</u> Temporary</p>   |

| Comment # | Section Name                | Page #  | Paragraph or Table # | General Comment  | Specific Comment  |   |
|-----------|-----------------------------|---------|----------------------|--|---|---|
|           |                             |         |                      |  | Existing Language   | Revised Language  |
|           |                             |         |                      |  | TL682, TL626, TL625, and TL629 (Table D.4-11). Absent mitigation, temporary impacts to jurisdictional resources are considered potentially significant under CEQA and adverse under NEPA. However, with implementation of APM BIO-03 (including SDG&E NCCP 7.1 Operational Protocols, 7.2 Habitat Enhancement Measures, and 7.4 Mitigation Credits), APM BIO-05, APM BIO-10, APM HYD-01 through APM HYD-11, MM HYD-2a, MM HYD-2b, MM BIO-1 through MM BIO-7, and MM BIO-10 through MM BIO-12, temporary impacts at or near project components would be mitigated under NEPA, and under CEQA, impacts would be less than significant with mitigation (Class II).   | impacts to CDFW and/or RWQCB resources may also occur as a result of construction components described above and will be quantified at a later date. (Table D.4-11). A total of 1.75 acres of temporary impacts to wetland resources would occur as a result of work in TL682, TL626, TL625, and TL629 (Table D.4-11). Absent mitigation, temporary impacts to jurisdictional resources are considered potentially significant under CEQA and adverse under NEPA. However, with implementation of APM BIO-03 (including SDG&E NCCP 7.1 Operational Protocols, 7.2 Habitat Enhancement Measures, and 7.4 Mitigation Credits), APM BIO-05, APM BIO-10, APM HYD-01 through APM HYD-11, MM HYD-2a, MM HYD-2b, MM BIO-1 through MM BIO-7, and MM BIO-10 through MM BIO-12, temporary impacts at or near project components within jurisdictional waters and wetlands would be mitigated under NEPA, and under CEQA, impacts would be less than significant with mitigation (Class II).   |
| 94.       | D.4.3 Environmental Effects | D.4-119 | Third paragraph      | In the Permanent Impacts section on page D.4-119, listing permanent impacts by pole is not appropriate since this level of detail is not available for all components of the Proposed Project, and some of these potential impacts may be avoided by further design modifications to the Proposed Project. Additionally, the Applicant Proposed Measures and mitigation measures will ensure that the Proposed Project does not result in permanent impacts to water quality within waters of the United States. | Replacement of existing poles numbers P40452 (C440), Z371562 (TL626), Z41023 and Z344173 (TL629), Z41023, Z571488, and Z571489 (TL6923) with new steel poles would occur within ACOE jurisdictional resources, including wetland and riparian resources (Table D.4-10 and Table D.4-11). Access to the poles would occur off adjacent dirt roads. A total of approximately 26.8 square feet (< 0.001 acre) of potentially ACOE-jurisdictional waters of the United States would be permanently impacted during construction. Permanent impacts to CDFW and/or RWQCB resources may also occur as a result of construction components described above (Table D.4-11). A total of 0.002 acre of permanent impacts to wetland resources would occur as a result of work in TL682, TL626, TL625, and TL629 (Table D.4-11). Water quality temporary impacts described above also have the potential to result in long-term permanent impacts to jurisdictional waters. Additionally, erosion over time as a result of unused access roads may potentially impact water sources. | <del>Replacement of existing poles numbers P40452 (C440), Z371562 (TL626), Z41023 and Z344173 (TL629), Z41023, Z571488, and Z571489 (TL6923) with new steel poles would occur within ACOE jurisdictional resources, including wetland and riparian resources (Table D.4-10 and Table D.4-11). Access to the poles would occur off adjacent dirt roads. A total of approximately 26.8 square feet (&lt; 0.001 acre) of potentially ACOE-jurisdictional waters of the United States would be permanently impacted during construction. Permanent impacts to CDFW and/or RWQCB resources may also occur as a result of construction components described above (Table D.4-11). A total of 0.002 acre of permanent impacts to wetland resources would occur as a result of work in TL682, TL626, TL625, and TL629 (Table D.4-11). Water quality temporary impacts described above also have the potential to result in long-term permanent impacts to jurisdictional waters. Additionally, erosion over time as a result of unused access roads may potentially impact water sources.</del><br><u>Pole replacements are anticipated to occur within ACOE USACE jurisdictional resources waters and/or wetlands, including wetland and riparian resources (Table D.4-10 and Table D.4-11). Access to these poles would occur off adjacent dirt roads. A total of approximately 26.8 square feet (&lt; 0.001 acre) of potentially ACOEUSACE-jurisdictional waters of the United States would be permanently impacted during construction. In addition, an estimated 0.002 acre of permanent impacts to USACE- jurisdictional wetlands is expected to occur as a result of work on TL625, TL626, TL629, and TL682. Permanent impacts to CDFW and RWQCB jurisdictional waters and wetland will also occur as a result of construction components described above and will be quantified at a later date. Permanent impacts to CDFW and/or RWQCB resources may also occur as a result of construction components described above (Table D.4-11). A total of 0.002 acre of permanent impacts to wetland resources would occur as a result of work in TL682, TL626, TL625, and TL629 (Table D.4-11). Water quality temporary impacts described above also have the</u> |

| Comment # | Section Name                | Page #              | Paragraph or Table #                                  | General Comment   | Specific Comment  |  |
|-----------|-----------------------------|---------------------|---|---|---|--|
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|           |                             |                     |   |   |   | potential to result in long-term permanent impacts to jurisdictional waters. Additionally, erosion over time as a result of unused access roads may potentially impact water sources.  |
| 95.       | D.4.3 Environmental Effects | D.4-119 and D.4-120 | Last paragraph on D.4-119 and continuation on D.4-120 | <p>This section states: “Project activities in drainage and wetland feature areas will be carried out under non-notifying Nationwide Permit No. 12 issued by ACOE...” This is not correct. SDG&amp;E anticipates notifying the USACE and receiving coverage under Nationwide Permit 3 for impacts from crossing existing roads and under Nationwide Permit 12 for all other linear impacts to jurisdictional resources, although the Proposed Project’s final permitting will be based on final design.</p> <p>This section also states: “The San Diego RWQCB determined that SDG&amp;E’s proposed project is categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301(b)” and specifies “Certification 11C-114; Categorical Exemption.” This project is not categorically exempt, and this determination was not made by the San Diego RWQCB. SDG&amp;E has not submitted any Water Quality Certification application for the Proposed Project to the San Diego RWQCB.</p> <p>This paragraph also states “Compensatory mitigation was not required.” This determination has not been made. A need for compensatory mitigation will be determined based on the final impact analysis.</p> | <p>ACOE and RWQCB — Project activities in drainage and wetland feature areas will be carried out under non-notifying Nationwide Permit No. 12 issued by ACOE, and a 401 Certification from RWQCB (Certification 11C-114; Categorical Exemption). Permanent impacts to ACOE wetlands associated with pole removal and replacement are approximately 26.8 square feet (&lt; 0.001 acre).</p> <p>Temporary impacts to ACOE jurisdictional wetlands and streambeds affect 0.21 acre. Compensatory mitigation was not required. The San Diego RWQCB determined that SDG&amp;E’s proposed project is categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301(b). The exemption applies to repair and maintenance of existing utility structures. Specifically the replacement of the existing wood poles constitutes maintenance of existing facilities to provide electric power as identified in Section 15301(b).</p> | <p><del>ACOE USACE and RWQCB —</del><br/> <u>Regulatory permitting for both temporary and permanent impacts resulting from Proposed Project construction is anticipated to be required for the USACE, RWQCB, and CDFW. Based on the final Proposed Project designs and the completed preliminary jurisdictional delineation, final Proposed Project impacts to waters and wetlands under the jurisdiction of each of these agencies will be determined. Temporary and permanent impacts to USACE jurisdictional waters and wetlands are anticipated to be permitted via Nationwide Permits 3 and 12. Temporary and permanent impacts to RWQCB jurisdictional waters and wetlands are anticipated to be permitted via a 401 Water Quality Certification. Temporary and permanent impacts to CDFW jurisdictional waters, wetlands, and riparian habitats will be permitted via a 1602 Streambed Alteration Agreement. Any required compensatory mitigation for temporary and permanent impacts will be outlined within an approved Habitat Mitigation and Monitoring Plan (HMMP). The HMMP will also specify on-site restoration of temporarily impacted waters and wetlands areas.</u></p> <p><del>Project activities in drainage and wetland feature areas will be carried out under non-notifying Nationwide Permit No. 12 issued by ACOE, and a 401 Certification from RWQCB (Certification 11C-114; Categorical Exemption). Permanent impacts to ACOE wetlands associated with pole removal and replacement are approximately 26.8 square feet (&lt; 0.001 acre).</del></p> <p><del>Temporary impacts to ACOE jurisdictional wetlands and streambeds affect 0.21 acre. Compensatory mitigation was not required. The San Diego RWQCB determined that SDG&amp;E’s proposed project is categorically exempt from CEQA pursuant to CEQA Guidelines Section 15301(b). The exemption applies to repair and maintenance of existing utility structures. Specifically the replacement of the existing wood poles constitutes maintenance of existing facilities to provide</del></p> |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                | Page #  | Paragraph or Table # | General Comment  | Specific Comment   |  |
|-----------|-----------------------------|---------|----------------------|--|--|--|
|           |                             |         |                      |  | Existing Language  | Revised Language   |
|           |                             |         |                      |  |  | electric power as identified in Section 15301(b).  |
| 96.       | D.4.3 Environmental Effects | D.4-120 | Second paragraph     | This paragraph states: “The temporary impacts associated with the removal of poles within CDFW jurisdiction will not substantially adversely affect an existing fish or wildlife resource; therefore, an SAA notification was not submitted.” While SDG&E anticipates that a SAA will be required for the Proposed Project, SDG&E has not yet consulted with CDFW. CDFW has not made the determination mentioned in this paragraph. Please revise accordingly. | CDFW – The temporary impacts associated with the removal of poles within CDFW jurisdiction will not substantially adversely affect an existing fish or wildlife resource; therefore, an SAA notification was not submitted.  | <del>CDFW – The temporary impacts associated with the removal of poles within CDFW jurisdiction will not substantially adversely affect an existing fish or wildlife resource; therefore, an SAA notification was not submitted.</del>   |
| 97.       | D.4.3 Environmental Effects | D.4-120 | Fourth paragraph     | Please revise this section as provided.  | Absent mitigation, temporary and permanent impacts to jurisdictional resources are considered potentially significant under CEQA and adverse under NEPA. However, through compliance with avoidance and minimization measures included in the RWQCB 401 certification application, compliance with the SDG&E Subregional NCCP, and implementation of APM BIO-03 (including SDG&E NCCP 7.1 Operational Protocols, 7.2 Habitat Enhancement Measures, and 7.4 Mitigation Credits), APM BIO-05, APM BIO-10, MM BIO-1 through MM BIO-7, and MM BIO-10 through MM BIO-12, temporary and permanent impacts at or near project components would be mitigated under NEPA, and under CEQA, impacts would be less than significant with mitigation (Class II).  | Absent mitigation, temporary and permanent impacts to jurisdictional resources are considered potentially significant under CEQA and adverse under NEPA. However, through compliance with avoidance and minimization measures included in the <u>regulatory agency permits</u> RWQCB 401 certification application, compliance with the SDG&E Subregional NCCP, and implementation of APM BIO-03 (including SDG&E NCCP 7.1 Operational Protocols, 7.2 Habitat Enhancement Measures, and 7.4 Mitigation Credits), APM BIO-05, APM BIO-10, MM BIO-1 through MM BIO-7, and MM BIO-10 through MM BIO-12, temporary and permanent impacts at or near project components would be mitigated under NEPA, and under CEQA, impacts would be less than significant with mitigation (Class II).   |
| 98.       | D.4.3.3                     | D.4-120 | MM BIO-10            | Please clarify that mapping will only be required for areas where impacts will occur. Additionally, please make the revisions provided for clarity.  | Jurisdictional mapping is required prior to construction. Obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit, a Clean Water Act Section 401 water quality certification, and a Section 1602 Streambed Alteration Agreement with the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife for impacts to jurisdictional features prior to project construction. These permits are anticipated to be approved under the MSUP. The terms and | Jurisdictional mapping is required prior to construction <u>for all work areas located within or adjacent to jurisdictional wetlands and waters</u> . Obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit <u>from the USACE</u> , a Clean Water Act Section 401 water quality certification <u>from the RWQCB</u> , and a Section 1602 Streambed Alteration Agreement with the <u>U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife</u> for impacts to jurisdictional features prior to project construction. |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name | Page #          | Paragraph or Table # | General Comment  | Specific Comment  |  |
|-----------|--------------|-----------------|----------------------|--|---|--|
|           |              |                 |                      |  | Existing Language   | Revised Language   |
|           |              |                 |                      |  | conditions of these authorizations shall be implemented.  | These permits are anticipated to be approved under the MSUP. The terms and conditions of these authorizations shall be implemented.  |
| 99.       | D.4.3.3      | D.4-121         | MM BIO-12            | SDG&E has explicitly stated in the POD that no new access roads will be constructed as part of the Proposed Project. As a result, this measure is not required and should be removed in its entirety.  | <b>Where drainage crossings are unavoidable, construct access roads at right angles to drainages.</b> Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.   | <del>Where drainage crossings are unavoidable, construct access roads at right angles to drainages.</del> Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.  |
| 100.      |              | D.4-122         | Third paragraph      | The first statement and other similar references are incorrect given SDG&E's practices and should be removed. Further, the term "great" is both qualitative and speculative. As a result, this statement should be removed.<br><br>As long as the pesticide and herbicide application requirements described in Section D.9 are implemented, water quality objectives will not be violated (MM HYD-5). Cottonwood Creek is on the Clean Water Act Section 303(d) list for the organochlorine pesticide DDT. The use of DDT was banned in 1972 and is no longer commercially available. | Pesticide application along Forest Service RCAs for Cottonwood Creek, currently impaired with pesticides under Section 303(d) of the CWA, would have a great potential to impact jurisdictional resources and violate water quality objectives (described in Section D.9, Hydrology and Water Quality). In addition, water requirements for the operations and maintenance of SDG&E's proposed project would include dust control required during periodic access road maintenance and for insulator washing. SDG&E has estimated long-term water usage to be 130,000 gallons per year to be purchased from local sources.  | <del>Pesticide application along Forest Service RCAs for Cottonwood Creek, currently impaired with pesticides under Section 303(d) of the CWA, would have a great potential to impact jurisdictional resources and violate water quality objectives (described in Section D.9, Hydrology and Water Quality). In addition, w</del> Water requirements for the operations and maintenance of SDG&E's proposed project would include dust control required during periodic access road maintenance and for insulator washing. SDG&E has estimated long-term water usage to be 130,000 gallons per year to be purchased from local sources.  |
| 101.      | D.4.3.3      | D.4-134 and 135 | MM BIO-13            | Consistent with SDG&E's standard practice, SDG&E will attempt to salvage, where possible, and will avoid and minimize impacts to special-status plants.  | Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing.<br><br>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 as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a Covered Species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided. | Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing. <u>SDG&amp;E has satisfied all mitigation obligations for NCCP covered species by complying with the NCCP. Where impacts to non-NCCP covered protected species (i.e., some Forest Service sensitive, federal or state-listed species) cannot be avoided, these impacts will be mitigated per proposed MM BIO-5(b) and MM BIO-20. SDG&amp;E will attempt to salvage, where possible, and will avoid and minimize impacts to these plants to the greatest extent feasible.</u><br><br><del>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 as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a Covered Species within the SDG&amp;E</del> |

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|           |              |         |                      |   | Existing Language   | Revised Language   |
|           |              |         |                      |   |   | NCCP, mitigation consistent with measures established in the NCCP shall be provided.   |
| 102.      | D.4.3.3      | D.4-138 | MM BIO-15            | <p>The term “permit issuance” is unclear in this context; SDG&amp;E assumes this term refers to issuance of the Permit to Construct and MSUP. If this is the case, then completion of land preservation within 18 months of this milestone is infeasible because these activities will take much longer given current legal and regulatory circumstances. Alternatively, the use of a surety or other financial guarantee (e.g., letter of credit should) should suffice if land preservation cannot be completed within the timeframe. A bond would only be required if SDG&amp;E’s credit rating falls below investment grade.</p> <p>No Proposed Project activities will occur within areas where the California Desert Native Plant Act would apply. Additionally, SDG&amp;E will already be required to mitigate for impacts to special-status plant species under other mitigation measures already included in the Draft EIR/EIS. These sentences should be removed from this mitigation measure.</p> <p>Please list which special status plants will require compensation. USFS sensitive species compensation should only apply when impacts are located on lands within the CNF boundary. In accordance with the NCCP, SDG&amp;E will avoid and minimize impacts to plants, but these impacts will not be known within 18 months of permit issuance due to the extended construction schedule of the Proposed Project. If a plant is impacted during construction, compensation will be applied after project completion, consistent with the requirements of the NCCP.</p> | <p><b>Implement special-status plant species compensation.</b> Impacts to special-status plant species shall be maximally avoided. 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. 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 Forest Service. Land preservation must be completed within 18 months of permit issuance. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required.</p> | <p><b>Implement special-status plant species compensation.</b> Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated <u>as outlined in BIO-5(b) through off-site land preservation and/or plant salvage and relocation.</u> 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 Forest Service. Land preservation must be completed, <u>or a surety or other financial guarantee of payment must be in place, within 1836 months of permit issuance initiation of construction.</u> A bond would only be required if SDG&amp;E’s credit rating falls below investment grade. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan (e.g. HRP, BIO-4) that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. <del>Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act.</del> Success criteria and monitoring shall also be included in the plan. <del>If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required.</del></p> |
| 103.      | D.4.3.3      | D.4-141 | MM BIO-17            | <p>MM BIO-17 incorrectly consolidates three species with separate regulatory and permitting requirements under one measure. SDG&amp;E has a low-effect Habitat Conservation Plan (HCP) for Quino checkerspot butterfly (QCB) that provides survey requirements for this species. The QCB HCP provides effective mitigation for potential impacts to this species. Therefore, QCB should be removed from this mitigation measure.</p> <p>SDG&amp;E will consult with the USFWS to determine the potential for impacts to Laguna Mountains skipper and the necessary mitigation requirements for those impacts. As a</p>  | <p><b>Conduct protocol surveys for Quino checkerspot, Hermes Copper, and Laguna Mountains skipper butterflies within 1 year prior to project construction activities in occupied habitat.</b> The project proponent shall conduct preconstruction protocol surveys for Quino checkerspot butterfly (QCB), Laguna Mountains skipper, and Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that historical surveys are adequate) in any area known to support the species.</p> <p>Surveys shall be conducted by a qualified, permitted</p>   | <p><b>Conduct protocol surveys for Quino checkerspot, Hermes <del>Copper</del>, and Laguna Mountains skipper butterflies within 1 year prior to project construction activities in occupied habitat.</b> The project proponent shall conduct preconstruction protocol surveys for <del>Quino checkerspot butterfly (QCB), Laguna Mountains skipper, and</del> Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that historical surveys are adequate) in any project construction area known to support the species <u>within the CNF boundary.</u></p> <p><del>Surveys shall be conducted by a qualified, permitted</del></p>   |

| Comment # | Section Name | Page #  | Paragraph or Table # | General Comment   | Specific Comment   |  |
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|           |              |         |                      |   | Existing Language  | Revised Language   |
|           |              |         |                      | <p>result, this species should be removed from this mitigation measure.</p> <p>The Hermes copper butterfly is the only butterfly species that should require a survey under this mitigation measure, and the requirement only applies within the CNF boundary. Additionally, this mitigation measure should clarify the extent of additional vegetation that should also be considered potential Hermes copper butterfly habitat.</p>   | <p>biologist in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be reported to USFWS within 45 days of the completion of the survey. Surveys for Hermes copper shall follow County of San Diego Guidelines.<sup>25</sup> A qualified biologist shall survey all potential habitat for Hermes copper which includes any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. Additional vegetation should also be considered potential habitat for Hermes copper if California buckwheat is within 15 feet of a mature spiny redberry shrub.</p> | <p><del>biologist in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be reported to USFWS within 45 days of the completion of the survey.</del> Surveys for Hermes copper <u>butterfly</u> shall follow County of San Diego Guidelines.<sup>25</sup> A qualified biologist shall survey all potential habitat for Hermes copper, which includes any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. <u>If California buckwheat is within 15 feet of a mature spiny redberry shrub, additional vegetation within 15 feet should also be considered potential habitat for Hermes copper.</u> <del>California buckwheat is within 15 feet of a mature spiny redberry shrub.</del></p> |
| 104.      | D.4.3.3      | D.4-142 | MM BIO-19            | <p>No critical habitat for Hermes copper butterfly has been identified. Additionally, all Proposed Project access roads are existing; no new roads are included as part of the Proposed Project. The existing road prism was constructed and is maintained according to SDG&amp;E's BMPs to ensure the safe and effective operation and transport of vehicles along these roads. Further, the Proposed Project has been carefully designed through a lengthy iterative process with the agencies to minimize potential environmental impacts, including potential impacts to these species. SDG&amp;E's vegetation management requirements are clearly defined according to California Public Resources Code and CPUC General Order requirements.</p> <p>SDG&amp;E will work with the agencies to explore potential design alternatives for the features identified in this mitigation measure, but ultimately the placement and design specifications of all features must first and foremost meet SDG&amp;E and other applicable safety and performance criteria. SDG&amp;E is already required to mitigate for impacts to these species under the various regulatory requirements as well as obtain agency approval for the final design.</p> <p>Additionally, the USFS-proposed undergrounding alternative for C440 contradicts this measure. Undergrounding an additional 14.3 miles of existing overhead distribution line in the Mount Laguna Recreation Area as described in Section B.3.2.3 of the Draft EIR/EIS would result in substantially more impacts to Laguna Mountains skipper habitat and associated host plants, and would limit SDG&amp;E's ability to</p> | <p><b>MM BIO-19 Final design of power and distribution line and access roads through Quino checkerspot, Hermes copper, and Laguna Mountains skipper critical habitat shall maximally avoid host plants for these species.</b> The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by the species. The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications, and it shall obtain agency approval of the final design through this area.</p>   | <p><b>MM BIO-19 Final design of power and distribution line and access roads through Quino checkerspot, Hermes copper, and Laguna Mountains skipper critical habitat and Hermes copper occupied habitat shall maximally avoid host plants for these species.</b> The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by these species <u>to the extent possible based on safety and other superseding regulatory requirements.</u> The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications, <u>where possible, to minimize impacts to host plants in critical habitat for these species and it shall obtain agency approval of the final design through this area.</u></p>  |

| Comment # | Section Name | Page #  | Paragraph or Table # | General Comment  | Specific Comment   |  |
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|           |              |         |                      |  | Existing Language  | Revised Language   |
|           |              |         |                      | avoid impacts to this species.   |  |  |
| 105.      | D.4.3.3      | D.4-142 | MM BIO-20            | <p>SDG&amp;E's NCCP already provides take coverage for most federally listed wildlife species potentially impacted by the Proposed Project. The NCCP also serves as a Section 2081 permit for state-listed species potentially impacted by the Proposed Project. As a result, SDG&amp;E will not seek consultation with the USFWS or a Section 2081 permit from CDFW for these species. These agencies have previously agreed to the terms and conditions of take and mitigation for the species covered by the NCCP. Please revise the text of this mitigation measure as provided.</p> <p>This mitigation measure incorrectly identifies QCB as a species addressed in SDG&amp;E's NCCP. SDG&amp;E has a separate low-effect HCP for this species that defines the protocols to be used to mitigate potential impacts to this species.</p> <p>SDG&amp;E will comply with the provisions of the NCCP and the QCB HCP to avoid impacts to listed species. Consultation will be conducted for species not covered under the NCCP or for species that may be listed during project construction.</p> <p>SDG&amp;E does not survey access roads that are currently in use for host plants, and these access roads are regularly maintained according to approved practices. Any additional survey requirements for these areas will be negotiated during informal consultation with the USFWS for this species. As a result, the references to access roads in this mitigation measure are unnecessary and should be removed as provided.</p> | <p><b>Obtain and implement the terms of agency permit(s) with jurisdiction federal or state-listed species.</b> If federally listed wildlife species may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species may be impacted by the project, SDG&amp;E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). SDG&amp;E shall implement and/or adhere to all USFWS recommendations stipulated by the Forest Service in the Special Use Permit; SDG&amp;E shall implement and/or adhere to all requirements in CDFW permit.</p> <p>When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&amp;E shall implement all applicable measures for this species defined in the SDG&amp;E regional NCCP. Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&amp;E shall implement all impact minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which includes:</p> <p>...</p> <p>3. Chipping of vegetation shall not be allowed in known or potential LMS habitat. This includes access roads and/or the ROW within or adjacent to (within 10 meters) known or potential LMS habitat. Potential habitat shall be identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW work.</p> <p>4. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to LMS habitat. This condition assumes that some roads/trails enter LMS habitat, but the road itself has been surveyed and does not contain host plants or nectar sources.</p> | <p><b>Obtain and implement the terms of agency permit(s) with jurisdiction federal or state-listed species.</b> If federally listed wildlife species <u>not already covered by SDG&amp;E's NCCP (including any species that may be listed prior to issuance of the PTC and MSUP)</u> may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species <u>not already covered by SDG&amp;E's NCCP</u> may be impacted by the project, SDG&amp;E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). SDG&amp;E shall implement and/or adhere to all USFWS recommendations stipulated by the Forest Service in the Special Use Permit; SDG&amp;E shall implement and/or adhere to all requirements in CDFW permit.</p> <p>When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&amp;E shall implement applicable <del>measures for</del> protocols to <u>avoid and minimize impacts to</u> this species defined in the SDG&amp;E regional NCCP <u>QCB Low-Effect Habitat Conservation Plan</u>. Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&amp;E shall implement all impact minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which includes:</p> <p>...</p> <p>3. Chipping of vegetation shall not be allowed in known or potential LMS habitat. This includes <del>access roads and/or</del> the ROW within or adjacent to (within 10 meters) known or potential LMS habitat. Potential habitat shall be identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW work.</p> <p>4. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to LMS habitat. <del>This condition assumes that some roads/trails enter LMS habitat, but the road itself has been surveyed and does not contain host plants or nectar sources.</del></p> |
| 106.      | D.4.3.3      | D.4.143 | MM BIO-21            | SDG&E has revised this measure to differentiate among the requirements for each of the three included butterfly species  | <b>If construction occurs in occupied and/or suitable habitat for Quino checkerspot, Hermes copper,</b>  | <b>If construction occurs in occupied and/or suitable habitat for sensitive butterfly species, SDG&amp;E will</b>  |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment   | Specific Comment   |   |
|-----------|--------------|--------|----------------------|---|--|---|
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|           |              |        |                      | based on current listing status as well as coverage by existing HCPs. SDG&E has a Low-effect HCP for QCB, and complying with current requirements satisfies all ESA obligations. Hermes Copper is not listed and therefore does not have the same protection by wildlife agencies. More practicable mitigation measures have been drafted to minimize impacts on this species as it is a USFS sensitive species only. Laguna Mountains skipper measures have been left in place since this is a listed species not covered by the NCCP and consultation will be required.   | <p><b>and Laguna Mountains skipper butterfly construction shall occur outside of the flight season OR 10 meters (33 feet) away from all host plant locations.</b> If there is a known or newly discovered occurrence during the flight season, construction shall be prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service determines construction activities may commence. Flight seasons occur during the following dates for the following species: June 1 – October 15 for QCB; mid-May to early-July (few days later at high elevations) for Hermes copper butterfly; and April – July for LMS.</p> | <p><b>implement the following:</b><br/> <b>Quino checkerspot;</b> SDG&amp;E will comply with the avoidance and minimization measures outlined in the <u>existing Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly.</u><br/> <b>Hermes copper;</b> Because this species is not state- or federally listed, the following will only be required for activities within the CNF: <u>While performing construction activities within the flight season, a qualified biological monitor will be on-site for all project activities to assure that both impacts to host plants and direct take of Hermes copper butterflies are avoided to the greatest extent feasible. The biological monitor may temporarily stop work in the event a Hermes copper butterfly is observed within the immediate construction area (i.e., the flagged work areas currently being used for construction activities.)</u><br/> <del>and Laguna Mountains skipper butterfly;</del><br/> <b>eConstruction shall will occur outside of the flight season OR at least 10 meters (33 feet) away from all host plant locations.</b> If there is a known or newly discovered occurrence during the flight season, construction shall be prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service determines construction activities may commence. <u>The Laguna Mountains skipper flight season occurs from April to July. Flight seasons occur during the following dates for the following species: June 1 – October 15 for QCB; mid-May to early July (few days later at high elevations) for Hermes copper butterfly; and April – July for LMS.</u></p> |
| 107.      | D.4.3.3      | D4-149 | Third paragraph      | <p>When considering impacts to migratory birds, it is important to focus on bird populations as opposed to individuals. Adverse impacts under the National Environmental Policy Act (NEPA) should emphasize species of concern, federally listed species, and potential impacts to the overall population of other birds under the Migratory Bird Treaty Act (MBTA) within a given area. Focus should be on actions that may have a measurable negative effect on migratory birds; with the priority on migratory bird species, priority habitats, critical areas, and key risk factors.</p> <p>CDFW has prepared a draft of new Sections 681.1-681.5 to add to Title 14 of the California Code of Regulations. SDG&amp;E understands that CDFW plans to initiate the</p> | <p>Absent mitigation, temporary and permanent impacts to an active nest of any bird species addressed under the MBTA or take of any MBTA-listed species or state- and federally listed species during construction activities are considered potentially significant under CEQA and adverse under NEPA.</p>  | <p>Absent mitigation, temporary and permanent impacts to <del>an active nest, occupied by eggs or nestlings,</del> of any <del>bird species addressed under the MBTA or take of any MBTA listed species or state- and federally listed species</del> <u>migratory bird species of concern; or take of 1) any migratory bird species of concern, 2) state- or federally listed species, or 3) adversely affect overall populations of other MBTA birds within a given area,</u> during construction activities are considered potentially significant under CEQA and adverse under NEPA.</p>   |

| Comment # | Section Name | Page #  | Paragraph or Table # | General Comment  | Specific Comment   |  |
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|           |              |         |                      | <p>rulemaking process to adopt these new sections in the near term. The purpose of the new sections is to implement California Fish and Game Code Sections 3503 and 3503.5. New Section 681.4 in the draft addresses CEQA thresholds of significance and provides a threshold that should apply to the Proposed Project. New Section 681.4 states:</p> <p>“Where acting as a State Lead or Responsible agency, the Department will conform with § 21166 of the Public Resources Code, CEQA Guidelines (14 CCR) § 15096, and rely on the following thresholds of significance for impacts related to take, possession, needless destruction or destruction of native bird nests, eggs or birds of prey. A significant impact on avian biological resources will occur if:</p> <p>(a) The project has a substantially adverse effect, either directly or through habitat modifications, on any population of a bird species identified as a candidate, threatened or endangered species by the Fish and Game Commission or a species of special concern by the Department of Fish and Wildlife.</p> <p>(b) The project has the potential to substantially reduce the habitat, restrict the range or cause a population of a bird species to drop below self-sustaining levels.</p> <p>(c) The project is likely to have long-term adverse consequences for one or more populations of native bird species, or</p> <p>(d) The project has direct or indirect environmental effects on bird species that are individually limited but cumulatively considerable.”</p> <p>MM BIO-28 should only apply to sensitive species or substantial impacts to bird populations that would be significant under CEQA.</p> |  |  |
| 108.      | D.4.3.3      | D.4-155 | MM BIO-28            | <p>The mitigation measure should reflect the wildlife agencies’ definitions of a nest. “Active nest” is not a term used in the California Fish and Game Code or the MBTA, and it has not been defined by the wildlife agencies.</p> <p>USFWS Memorandum on Nest Destruction dated April 15, 2003 (MBPM-2) states: “The MBTA does not contain any prohibition that applies to the destruction of a migratory bird</p>   | <p>If an active nest (defined below) is identified adjacent to grading or site disturbance within the requisite nest buffer, the nest shall be monitored on a daily basis by a qualified biologist until project activities are no longer occurring within the nest buffer or until fledglings become independent of the nest. “Nest” is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing</p> | <p>If an <del>active</del> nest (defined below) is identified adjacent to grading or site disturbance within the requisite nest buffer, the nest status shall be monitored on a weekly basis by a qualified biologist until project activities are no longer occurring within the nest buffer or until fledglings become independent of the nest. “Nest” is defined as: <del>a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing</del></p> |

| Comment # | Section Name | Page #  | Paragraph or Table # | General Comment   | Specific Comment  |  |
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|           |              |         |                      | <p>nest alone (without birds or eggs), provided that no possession occurs during the destruction.” The Memorandum further states: “The MBTA specifically protects migratory bird nests from <i>possession, sale, purchase, barter, transport, import, and export, and take.</i>” The other prohibitions of the MBTA -<i>capture, pursue, hunt, and kill</i> -are inapplicable to nests. The regulatory definition of <i>take</i>, as defined by 50 CFR 10.12, <i>means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to hunt, shoot, wound, kill, trap, capture, or collect.</i> Only <i>collect</i> applies to nests.” (emphasis added).</p> <p>CDFW has prepared a draft of new Sections 681.1-681.5 to add to Title 14 of the California Code of Regulations. The most recent draft is dated July 17, 2014, and is attached. SDG&amp;E understands that CDFW plans to initiate the rulemaking process to adopt these new sections in the near term. The purpose of the new sections is to implement California Fish and Game Code Sections 3503 and 3503.5. New Section 681.2(e) in the draft defines a nest as: “A site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird.” This definition should apply to the Proposed Project. Please revise the text as provided to account for the Memorandum and new Section 681.2(e) in the draft.</p> | <p>young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.</p>   | <p><del>young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.</del> <u>a site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird.</u></p>   |
| 109.      | D.4.3.3      | D.4-156 | MM BIO-28            | <p>Please clarify that these data are not required—in some cases they may not be possible to be determined, or data collection would be detrimental to nest success.</p>  | <p>A nesting bird report, at a minimum, shall include ..., nest stage [number of eggs, number of nestlings]), recommended compliance (e.g., 100-foot buffer recommended, buffer increased with explanation, recommended noise reduction, noise dBA Leq levels at nest), and compliance issues/concerns.</p>   | <p>A nesting bird report, at a minimum, shall include ..., nest stage [number of eggs, <del>number of or</del> nestlings, <u>if possible</u>]), recommended compliance (e.g., 100-foot buffer recommended, buffer increased with explanation, recommended noise reduction, <u>and</u> noise dBA Leq levels at nest, <u>if practicable</u>), and compliance issues/concerns.</p>  |
| 110.      | D.4.3.3      | D.4-156 | MM BIO-29            | <p>The mitigation measure should reflect the wildlife agencies’ definitions of a nest. “Active nest” is not a term used in the California Fish and Game Code or the MBTA, and it has not been defined by the applicable wildlife agencies.</p> <p>CDFW is in the process of proposing Regulation 681 to implement California Fish and Game Code Sections 3503 and 3503.5. The proposed Regulation Section 681.2 (e) defines nest as: “A site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird.” Please revise the text as provided to account for proposed</p>  | <p>“Nest” is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.</p> | <p>“Nest” is defined as: a <del>structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young.</del> <u>Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the</u></p> |

| Comment # | Section Name | Page #              | Paragraph or Table # | General Comment  | Specific Comment  |   |
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|           |              |                     |                      | Regulation 681.  |   | <del>nest.</del>  |
| 111.      | D.4.3.3      | D.4-160             | MM BIO-30            | Clarify that project vehicle traffic on existing access roads (used by the public, Forest Service, or others) is not subject to this measure.  | No restrictions apply outside of the pupping season.  | No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.   |
| 112.      | D.4.4.2      | D.4-202 through 205 | MM BIO-33            | <p>Arroyo toad is a species covered by SDG&amp;E's NCCP and will be mitigated for according to the conditions described in MM BIO-4 and MM BIO-5 as revised.</p> <p>This measure is unclear about whether it refers to exclusion fencing or another type of fence to be installed. If this measure refers to exclusion fencing, SDG&amp;E believes that the placement of exclusion fencing and pitfall traps could have larger, unintended potential effects on other resources—specifically, other biological, cultural, and hydrological resources. SDG&amp;E proposes to instead conduct pre-construction surveys and biological resource monitoring, and to clearly demarcate work areas to ensure that work only occurs in areas confirmed to not have arroyo toad present. Additionally, the phrase “toad sensitive areas” should be revised to “occupied toad habitat”.</p> <p>“Riverbed areas” should be defined. Arroyo toads are known to breed in both “rivers” and creeks/streams if conditions are appropriate. The use of the term “riverbed” is misleading.</p> <p>The buffer described in this mitigation measure does not account for geographical barriers that may preclude arroyo toad movement, such as geographical barriers between the bottom of a steep canyon, where arroyo toad are present, and a construction site at the top of a steep mountain, where arroyo toad are not present. Arroyo toad restrictions should only apply to locations that have the potential to support breeding, estivating, foraging or dispersing individuals.</p> <p>“Widely distributed” should be defined. This mitigation measure requires fencing where arroyo toads are widely distributed. This term is open for interpretation and may lead to confusion. .</p> | <p><b>Focused surveys for arroyo toad shall be conducted.</b> Prior to initiating construction, all riverbed areas within 1,000 feet of construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31) for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed. If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring plan that includes the following measures, in consultation with the USFWS:</p> <ol style="list-style-type: none"> <li>1. The applicant shall retain a qualified biologist with demonstrated expertise with arroyo toads to monitor all construction activities in potential arroyo toad habitat and assist the project applicant in the implementation of the monitoring program. This person will be approved by the CPUC and Forest Service prior to the onset of ground-disturbing activities. This biologist will be referred to as the “authorized biologist” hereafter. The authorized biologist will be present during all activities immediately adjacent to or within habitat that supports populations of arroyo toad.</li> <li>2. Prior to the onset of construction activities, the authorized biologist shall provide all personnel who will be present on work areas within or adjacent to the project site with the following information:                         <ol style="list-style-type: none"> <li>a. A detailed description of the arroyo toad, including color photographs;</li> <li>b. A description of the protection the arroyo toad receives under the Endangered Species Act (ESA) and possible legal action that may be incurred for violation of the act;</li> <li>c. The protective measures being implemented to conserve the arroyo toad and other species during construction activities associated with the proposed</li> </ol> </li> </ol> | <p><b>Focused surveys for arroyo toad shall be conducted.</b> Prior to initiating construction, all <del>riverbed</del> <u>riparian</u> areas <u>that have the potential to support arroyo toad and are</u> within 1,000 feet of <u>and have a topographically appropriate connection to</u> construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31) for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed. If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring plan that includes the following measures, <del>in consultation with the USEWS:</del></p> <ol style="list-style-type: none"> <li>1. The applicant shall retain a qualified biologist with demonstrated expertise with arroyo toads to monitor all construction activities in potential arroyo toad habitat and assist the project applicant in the implementation of the monitoring program. This person will be approved by the CPUC and Forest Service prior to the onset of ground-disturbing activities. This biologist will be referred to as the “authorized biologist” hereafter. The authorized biologist will be present during all activities immediately adjacent to or within habitat that supports populations of arroyo toad.</li> <li>2. Prior to the onset of construction activities, the authorized biologist shall provide all personnel who will be present on work areas within or adjacent to the project site with the following information:                         <ol style="list-style-type: none"> <li>a. A detailed description of the arroyo toad, including color photographs;</li> <li>b. A description of the protection the arroyo toad receives under the Endangered Species Act (ESA) and possible legal action that may be incurred for violation of the act;</li> <li>c. The protective measures being implemented to conserve the arroyo toad and other species during construction activities associated with the proposed</li> </ol> </li> </ol> |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment | Specific Comment  |   |
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|           |              |        |                      |                 | <p>project; and</p> <p>d. A point of contact if arroyo toads are observed.</p> <p>3. All trash that may attract predators of the arroyo toad will be removed from work sites or completely secured at the end of each workday.</p> <p>4. Prior to the onset of any construction activities, the project applicant shall meet on site with staff from the USFWS and the authorized biologist. The applicant shall provide information on the general location of construction activities within habitat of the arroyo toad and the actions taken to reduce impacts to this species. Because arroyo toads may occur in various locations during different seasons of the year, the project applicant, USFWS, and authorized biologists will, at this preliminary meeting, determine the seasons when specific construction activities would have the least adverse effect on arroyo toads. The goal of this effort is to avoid mortality of arroyo toads during construction.</p> <p>5. Where construction can occur in habitat where arroyo toads are widely distributed, work areas will be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat. The authorized biologist will assist in determining the boundaries of the area to be fenced in consultation with the USFWS. All workers will be advised that equipment and vehicles must remain within the fenced work areas.</p> <p>6. The authorized biologist will direct the installation of the fence and conduct a minimum of three nocturnal surveys to move any arroyo toads from within the fenced area to suitable habitat outside of the fence. If arroyo toads are observed on the final survey or during subsequent checks, the authorized biologist will conduct additional nocturnal surveys if he or she determines that they are necessary in concurrence with the USFWS.</p> <p>7. Fencing to exclude arroyo toads will be at least 24 inches in height.</p> <p>8. The type of fencing must be approved by the authorized biologist and the USFWS.</p> <p>9. Construction activities that may occur immediately adjacent to breeding pools or other areas where large numbers of arroyo toads may congregate will be conducted during times of the year (fall/winter) when</p> | <p>project; and</p> <p>d. A point of contact if arroyo toads are observed.</p> <p>3. All trash that may attract predators of the arroyo toad will be removed from work sites or completely secured at the end of each workday.</p> <p>4. Prior to the onset of any construction activities, the project applicant shall meet on site with staff from the USFWS and the authorized biologist. The applicant shall provide information on the general location of construction activities within habitat of the arroyo toad and the actions taken to reduce impacts to this species. Because arroyo toads may occur in various locations during different seasons of the year, the project applicant, USFWS, and authorized biologists will, at this preliminary meeting, determine the seasons when specific construction activities would have the least adverse effect on arroyo toads. The goal of this effort is to avoid mortality of arroyo toads during construction.</p> <p>5. Where construction can occur in habitat where arroyo toads are widely distributed, work areas will be <del>fenced</del> <u>demarcated</u> in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat. The authorized biologist will assist in determining the boundaries of the area to be <u>demarcated</u><del>fenced in</del> <del>consultation with the USFWS</del>. All workers will be advised that equipment and vehicles must remain within the <del>fenced</del> <u>demarcated</u> work areas.</p> <p><del>6. The authorized biologist will direct the installation of the fence and conduct a minimum of three nocturnal surveys to move any arroyo toads from within the fenced area to suitable habitat outside of the fence. If arroyo toads are observed on the final survey or during subsequent checks, the authorized biologist will conduct additional nocturnal surveys if he or she determines that they are necessary in concurrence with the USFWS.</del></p> <p><del>7. Fencing to exclude arroyo toads will be at least 24 inches in height.</del></p> <p><del>8. The type of fencing must be approved by the authorized biologist and the USFWS.</del></p> <p>96. Construction activities that may occur immediately adjacent to breeding pools or other areas where large numbers of arroyo toads may congregate will be conducted during times of the year (fall/winter) when individuals have dispersed from these areas. The authorized biologist will assist the project applicant in</p> |

| Comment # | Section Name | Page # | Paragraph or Table # | General Comment | Specific Comment   |   |
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|           |              |        |                      |                 | Existing Language  | Revised Language  |
|           |              |        |                      |                 | <p>individuals have dispersed from these areas. The authorized biologist will assist the project applicant in scheduling its work activities accordingly.</p> <p>10. If arroyo toads are found within an area that has been fenced to exclude arroyo toads, activities will cease until the authorized biologist moves the arroyo toads.</p> <p>11. If arroyo toads are found in a construction area where fencing was deemed unnecessary, work will cease until the authorized biologist moves the arroyo toads. The authorized biologist, in consultation with USFWS, will then determine whether additional surveys or fencing are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist and USFWS.</p> <p>12. Any arroyo toads found during clearance surveys or otherwise removed from work areas will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. Clearance surveys shall occur on a daily basis in the work area.</p> <p>13. The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed.</p> <p>14. Staging areas for all construction activities will be located on previously disturbed upland areas designated for this purpose. All staging areas will be fenced within potential toad habitat.</p> <p>15. To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force (DAPTF 2009) will be followed at all times.</p> <p>16. Drift fence/pitfall trap surveys will be implemented in toad sensitive areas prior to construction in an effort to reduce potential mortality to this species. Prior to any construction activities in the project site, silt fence shall be installed completely around the proposed work area and a qualified biologist should conduct a preconstruction/clearance survey of the work area for arroyo toads. Any toads found in the work area should be relocated to suitable habitat. The silt fence shall be maintained for the</p> | <p>scheduling its work activities accordingly.</p> <p><del>107.</del> If arroyo toads are found within a <u>Proposed Project work area</u> <del>an area that has been fenced to exclude arroyo toads</del>, activities will cease until the authorized biologist moves the arroyo toads.</p> <p><del>118.</del> If arroyo toads are found in a <u>Proposed Project work area</u> <del>construction area where fencing was deemed unnecessary</del>, work will cease until the authorized biologist moves the arroyo toads. The authorized biologist, in <del>consultation</del> <u>coordination</u> with the USFWS, will then determine whether additional <del>surveys or fencing</del> <u>measures</u> are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist and USFWS.</p> <p><del>129.</del> Any arroyo toads found during clearance surveys <u>or monitoring</u>, or <u>are</u> otherwise removed from work areas, will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. Clearance surveys shall occur on a daily basis in the work area.</p> <p><del>1310.</del> The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed.</p> <p><del>1411.</del> Staging areas for all construction activities will be located on previously disturbed upland areas designated for this purpose. All staging areas will be fenced within potential toad habitat <u>in compliance and coordination with similar SWPPP practices</u>.</p> <p><del>1512.</del> To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force (DAPTF 2009) will be followed at all times.</p> <p><del>16.</del> <del>Drift fence/pitfall trap surveys will be implemented in toad sensitive areas prior to construction in an effort to reduce potential mortality to this species. Prior to any construction activities in the project site, silt fence shall be installed completely around the proposed work area and a qualified biologist should conduct a preconstruction/clearance survey of the work area for arroyo toads. Any toads found in the work area should be relocated to suitable habitat. The silt fence shall be maintained for the duration of the work activity.</del><br/> <u>On Forest Service lands, occupied arroyo toad breeding</u></p> |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name   | Page #  | Paragraph or Table # | General Comment   | Specific Comment   |   |
|-----------|--|---------|----------------------|---|--|---|
|           |  |         |                      |   | Existing Language  | Revised Language  |
|           |  |         |                      |   | duration of the work activity.<br>On Forest Service lands, occupied arroyo toad breeding habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo toad habitat (or designated critical habitat) will be mitigated at 2:140. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined.<br><br>The applicant shall restrict work to daylight hours, except during an emergency <sup>41</sup> , in order to avoid nighttime activities when arroyo toads may be present on the access road. Traffic speed should be maintained at 15 mph or less in the work area. | habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo toad habitat (or designated critical habitat) will be mitigated at 2:140. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined.<br><br>The applicant shall restrict work to daylight hours, except during an emergency <sup>41</sup> , in order to avoid nighttime activities when arroyo toads may be present on the access road. Traffic speed should be maintained at 15 mph or less in the work area. |
| 113.      | D.4.9, MM BIO-5, Compliance Documentation and Consultation | D.4-216 | Table D.4-17         | This is largely a post-construction effort and would not be documented in compliance monitoring reports during construction. Coordination with permitting agencies is likely to be a lengthy and ongoing process. | d. CPUC/Forest Service monitor: Line item in compliance monitoring reports   | <del>d. CPUC/Forest Service monitor: Line item in compliance monitoring reports</del>   |
| 114.      | D.4.9, MM BIO-5, Timing                                    | D.4-216 | Table D.4-17         | This is largely a post-construction effort and would not be documented in compliance monitoring reports during construction. Coordination with permitting agencies is likely to be a lengthy and ongoing process. | b. No later than 18 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place)<br><br>c. Within 2 weeks of coordination with permitting agencies<br><br>d. During construction   | b. No later than <del>18</del> <sup>36</sup> months after the initiation of project construction (long-term management and legal protection, <u>or surety</u> for mitigation lands shall be in place)<br><br>c. Within 2 weeks of <u>completion of</u> coordination with permitting agencies<br><br>d. <del>During</del> <u>Post-construction</u>   |
| 115.      | D.4.9, MM BIO-11   | D.4-220 | Table D.4-17, Timing | Coordination with permitting agencies is likely to be a lengthy and ongoing process.  | b. and c. Prior to notice to proceed   | b. <del>and c.</del> Prior to notice to proceed<br><u>c. Within two weeks of completion of coordination with permitting agencies</u>  |
| 116.      | D.4.9, MM BIO-14, Timing                                   | D.4-222 | Table D.4-17         | A two-day timeline for providing survey results following completion of special-status plant species is infeasible. More time is needed to provide survey results.  | c. Within 2 days after surveys are completed and at least two weeks prior to construction  | c. Within <del>2 days</del> <u>two weeks</u> after surveys are completed and at least two weeks prior to construction   |
| 117.      | D.4.9, MM BIO-16, Timing                                   | D.4-223 | Table D.4-17         | A two-day timeline for providing survey results following completion of special-status plant species is infeasible. More time is needed to provide survey results.  | c. Within 2 days after surveys are completed and at least two weeks prior to construction  | c. Within <del>2 days</del> <u>two weeks</u> after surveys are completed and at least two weeks prior to construction   |
| 118.      | D.4.9, MM BIO-17, Location                                 | D.4-224 | Table D.4-17         | The Hermes copper survey measure should apply only to portions of the Proposed Project within the CNF boundary.   | Suitable habitat for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly of project/alternatives area.  | Suitable habitat for <del>Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly</del> of project/alternatives area <u>that occurs within the CNF boundary.</u>   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment #   | Section Name                                     | Page #  | Paragraph or Table #                               | General Comment   | Specific Comment  |   |
|---|--|---------|--|---|---|---|
|   |  |         |  |   | Existing Language   | Revised Language  |
| 119.  | D.4.9, MM BIO-17, Timing                         | D.4-224 | Table D.4-17                                       | Because construction schedules can vary depending on local conditions that are outside of SDG&E's control (e.g., weather), SDG&E recommends revising this section to allow for unforeseen changes to the Proposed Project's construction schedule that may occur. Additionally, this section contains a typographical error regarding when the survey report should be completed.         | b. Within 1 year of the initiation of project construction in occupied habitat.<br><br>c. Within 45-days weeks after surveys are completed and at least 2 weeks prior to construction | b. Within 1 year of the initiation of <del>planned</del> project construction in occupied habitat.<br><br>c. Within 45-days <del>weeks</del> after surveys are completed and at least 2 weeks prior to construction   |
| 120.  | D.4.9, MM BIO-21, Location                       | D.4-227 | Table D.4-17                                       | This measure details mitigation to be implemented during construction of the Proposed Project, not operation and maintenance.   | All operations and maintenance areas of the project/alternative site.   | <del>All operations and maintenance areas of the project/alternative site.</del> <u>Occupied and/or suitable Quino checkerspot or Laguna Mountains skipper habitat along the project/alternatives area.</u>   |
| 121.  | D.4.9  | D.4-231 | Table D.4-17, MM BIO-29, Location                  | Please clarify that project vehicle traffic on existing access roads used by the public, Forest Service, or others is not subject to this measure.  | <i>Location.</i> In and around any construction activity in the project/alternative area (100 feet for passerine birds and 300 feet for raptors)                                      | <i>Location.</i> In and around any construction activity in the project/alternative area (100 feet for passerine birds and 300 feet for raptors), <u>with the exception of existing access roads.</u>   |
| 122.  | D.4.9  | D.4-231 | Table D.4-17, MM BIO-30, Location                  | Clarify that project vehicle traffic on existing access roads (used by the public, Forest Service, or others) is not subject to this measure.   | In historically occupied sites and current suitable habitat within 500 feet of all project lines.   | In historically occupied sites and current suitable habitat within 500 feet of all project lines <u>not including access roads.</u>   |
| 123.  | D.4.9, MM BIO-32, Location                       | D.4-235 | Table D.4-17                                       | MM BIO-32 Procedural requirements for pesticide applications should only apply to operation and maintenance activities. (See SDG&E comment for MM HYD-5).   |   |   |
| <b>D.5 – Cultural and Paleontological Resources</b> |  |         |  |   |   |   |
| 124.  | D.5.1 Environmental Setting/Affected Environment | D.5-1   | Fourth paragraph                                   | Please add a timestamp for Traditional Cultural Property (TCP) identification to clarify that information pertaining to these areas is current as of the timing of the study.   | Other examples of TCPs include buildings, parks, neighborhoods, or other places required to maintain contemporary cultural traditions.  | Other examples of TCPs include buildings, parks, neighborhoods, or other places required to maintain contemporary cultural traditions. <u>All TCPs identified and referenced in this document were acknowledged prior to completion of the Draft EIR/EIS in 2014.</u> |
| 125.  | D.5.1 Environmental Setting/Affected Environment | D.5-1   |  | Please describe the SDG&E APE as well as the USFS APE at the outset of this section, and clarify throughout the document which APE is being referenced at each use. Please also be consistent with the terminology for each— SDG&E's APE should be referred to as the Proposed Project APE, while the USFS' APE should be referred to as the Forest Service APE or CNF APE, but not both. |   |   |
| 126.  | D.5.1 Environmental Setting/Affected Environment | D.5-2   | Last paragraph (under Methodology and Assumptions) | Please clarify that the APE cited in this section refers to the Proposed Project APE and not the USFS or another APE.   | The APE did not include all the areas identified in the Forest Service proposed action nor did it include areas identified in the alternatives.                                       | The <u>Proposed Project</u> APE did not include all the areas identified in the Forest Service proposed action nor did it include areas identified in the alternatives.   |
| 127.  | D.5.1 Environmental Setting/Affected Environment | D.5-2   | Last paragraph (under Methodology)                 | Please identify specifically which part of the USFS Proposed Action and alternatives were not included in the Proposed  | The APE did not include all the areas identified in the Forest Service proposed action nor did it include areas   | The APE did not include all the areas identified in the Forest Service proposed action nor did it include areas identified in the alternatives. <u>The following alternatives</u>   |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                                     | Page # | Paragraph or Table # | General Comment  | Specific Comment   |   |
|-----------|--|--------|----------------------|--|--|---|
|           |  |        |                      |  | Existing Language  | Revised Language  |
|           | d Environment                                    |        | and Assumptions)     | Project APE.   | identified in the alternatives.  | were not included in the Proposed Project APE:  |
| 128.      | D.5.1 Environmental Setting/Affected Environment | D.5-3  | Sixth bullet point   | The sixth bullet point should be divided into two separate points.   | <ul style="list-style-type: none"> <li>Lands on the La Jolla Indian Reservation could not be surveyed, and the tribe did not grant permission to conduct a record search. All work was completed...</li> </ul>   | <ul style="list-style-type: none"> <li>Lands on the La Jolla Indian Reservation could not be surveyed, and the tribe did not grant permission to conduct a record search.</li> <li>All work was completed...</li> </ul>   |
| 129.      | D.5.1 Environmental Setting/Affected Environment | D.5-3  | Seventh bullet point | In addition to the recommended text change provided here, the seventh bullet point should identify which tribal groups received individual letters. Additionally, this point should state that no responses were received as of the release date of the Draft EIR/EIS. | ... to the Native American Heritage Commission (NAHC) for their consideration and input.   | ... to the Native American Heritage Commission (NAHC) for their consideration and input. <u>The NAHC recommended that individual tribal groups be contacted for additional information. The tribal groups contacted include [insert specific tribal groups]. Letters of inquiry have been sent to all groups and no responses have been received.</u>   |
| 130.      | D.5.1.1 General Overview                         | D.5-4  | Last paragraph       | The Final EIR/EIS should include a statement that SDG&E is currently conducting the existing infrastructure evaluation.  | SDG&E has not completed this evaluation, and the status and eligibility of the existing infrastructure is unknown.   | <u>At the time of Draft EIR/EIS issuance, SDG&amp;E was in the process of conducting</u> <del>has not completed</del> this evaluation, and the status and eligibility of the existing infrastructure is unknown.  |
| 131.      | D.5.1.2 Record Search and Survey Results         | D.5-10 | Fourth paragraph     | Please provide a reference citation for the data included in this paragraph and clarify which APE is being used.   |  |   |
| 132.      | D.5.1.2 Record Search and Survey Results         | D.5-21 | First paragraph      | This statement incorrectly reports that nine locations were consulted. Please revise as provided.  | According to consultation with the Xakwa', Wiiapaayp, Wiikilyutciis, PiLyakay', Xakwiitceploy'iik, Xarpsii'tl, Wii'Kana'rLaxa, Kwatatl, and Xarpuuwii, nine Native American sites primarily made up of smaller group camps, or production-specific satellites to the larger permanent villages at Kwatatl and Wiiapaayp, are within the APE. | According to the <u>literature review</u> , <del>consultation with the Xakwa', Wiiapaayp, Wiikilyutciis, PiLyakay', Xakwiitceploy'iik, Xarpsii'tl, Wii'Kana'rLaxa, Kwatatl, and Xarpuuwii,</del> nine Native American sites, <u>primarily</u> <del>primarily</del> made up of smaller group camps, or production-specific satellites to the <u>larger</u> <del>larger</del> permanent villages at Kwatatl and Wiiapaayp, are within the APE: <u>Xakwa', Wiiapaayp, Wiikilyutciis, PiLyakay', Xakwiitceploy'iik, Xarpsii'tl, Wii'Kana'rLaxa, Kwatatl, and Xarpuuwii.</u>   |
| 133.      | D.5.2.1 Federal Regulations                      | D.5-28 | Second paragraph     | Please add further clarification specific to the management of cultural resources from the Regional Programmatic Agreement as provided.  | This Regional Programmatic Agreement (RPA) establishes the policies and procedures that the FS follows in implementing NHPA Section 106 Guidelines, to help guide the FS planning and decision making as it affects historic properties and other cultural properties. This includes policies regarding Native American consultation...      | This Regional Programmatic Agreement (RPA) establishes the policies and procedures that the FS follows in implementing NHPA Section 106 Guidelines, to help guide the FS planning and decision making as it affects historic properties and other cultural properties. <u>These procedures were developed to ensure no adverse effect to historic properties. The RPA outlines the process for identification and evaluation, if necessary, of historic properties, as well as the coordination and standards for mitigation monitoring efforts, inadvertent effects, and reporting.</u> This includes policies regarding Native American consultation... |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                        | Page # | Paragraph or Table # | General Comment  | Specific Comment   |  |
|-----------|-------------------------------------|--------|----------------------|--|--|--|
|           |                                     |        |                      |  | Existing Language  | Revised Language   |
| 134.      | D.5.2.2 State Laws and Regulations  | D.5-33 | Third paragraph      | Please make the revision provided.   | c. Embodies the distinctive characteristics of a type, period region or method construction, or represents the work of an important individual or possess high artistic values.  | c. Embodies the distinctive characteristics of a type, period region or method <u>of</u> construction, or represents the work of an important individual or possess high artistic values.  |
| 135.      | D.5.2.2 State Laws and Regulations  | D.5-33 | Fourth paragraph     | Please make the revision provided.   | d. Has yielded, or may yield, important information in prehistory or history   | d. Has yielded, or may yield, important information in prehistory or history <sub>2</sub> .  |
| 136.      | D.5.3.3 Direct and Indirect Impacts | D.5-44 | MM CUL-1             | <p>The first paragraph addressing requirements of MM CUL-1 is not included as part of CUL-1 in table D.5-15. The intent of MM CUL-01 is to require a comprehensive approach/Programmatic Agreement that encompasses the whole of the project. The first paragraph may have been erroneously included in the measure. Please remove this statement from MM CUL-1 as provided.</p> <p>Additionally, the requirement set forth in this paragraph is duplicative of APM CUL-05, which states that SDG&amp;E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources Technical Report. APM CUL-05 is already listed as required mitigation in the paragraph above.</p>                       | <p><b>MM CUL-1</b> In order to reduce adverse effects and significant impacts to resources identified in Table D.5-12, new poles near identified cultural sites along TL626 and TL682 shall be set within 4 feet of the existing pole. Additionally, construction vehicles and personnel shall stay within the access road, and no blading of the access road shall occur. If the new pole needs to be placed more than 4 feet from the existing pole or if pole replacement consists of a foundation pole or undergrounding, a cultural monitor shall be required.</p> <p>In order to avoid adverse effects to historic properties, SDG&amp;E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements: [etc]</p> | <p><del><b>MM CUL-1</b></del> In order to reduce adverse effects and significant impacts to resources identified in Table D.5-12, <del>new poles</del> <u>APM CUL-05 shall be implemented near identified cultural sites along TL626 and TL682 to the extent reasonably feasible, shall be set within 4 feet of the existing pole.</u> Additionally, <del>construction vehicles and personnel shall stay within the access road, and no blading of the access road shall occur.</del> <u>If the new pole needs to be placed more than 4 feet from the existing pole or if pole replacement consists of a foundation pole or undergrounding, a cultural monitor shall be required.</u></p> <p><b>MM CUL-1</b> In order to avoid adverse effects to historic properties, SDG&amp;E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements: [etc]</p> |
| 137.      | D.5.3.3 Direct and Indirect Impacts | D.5-44 | MM CUL-1a            | <p>Requirement 1a should clarify that SDG&amp;E will complete inventories in areas that have not been previously surveyed during initial studies. As written, the requirement could be interpreted to state that SDG&amp;E will conduct surveys of all portions of the APE (please also clarify which APE is referenced here; SDG&amp;E assumes it is the Proposed Project APE). This requirement is also duplicative of APM CUL-02 which states:</p> <p>Intensive pedestrian surveys will be conducted prior to construction in those areas within the ROWs for which initial survey access was not granted to determine the potential for impacts to cultural resources in these areas.</p> <p>Please also define the federal agencies to whom the</p> | <p><b>1a – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE).</b> Prior to any ground disturbing activities, SDG&amp;E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall supplement surveys done for the EIR/EIS and will satisfy Section 106 requirements.</p>  | <p><b>1a – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE).</b> <u>Following the completion of APM CUL-02 and P</u><del>p</del><u>rior</u> to any ground disturbing activities, SDG&amp;E will complete inventories within the <u>Proposed Project APE</u> and submit the results of those inventories for approval by the CPUC and <del>federal agencies</del>[identify which specific federal agencies]. These surveys shall <u>cover only those portions of the Proposed Project APE not previously surveyed, to serve as a supplement to surveys done for the EIR/EIS, and will</u> satisfy Section 106 requirements.</p>  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                                  | Page # | Paragraph or Table #                               | General Comment  | Specific Comment   |  |
|-----------|---|--------|--|--|--|--|
|           |   |        |  |  | Existing Language  | Revised Language   |
|           |   |        |  | inventories will be submitted for approval.  |  |  |
| 138.      | D.5.3.3 Direct and Indirect Impacts           | D.5-45 | MM CUL-1c  | As currently written, this requirement does not clearly define the agencies to which the HPTP will be submitted for approval. Please specifically state in the requirement which agencies will require submittal. This requirement also duplicates APM CUL-06, which should be referenced to eliminate inconsistencies.  | <b>1c. – Develop and Implement Historic Properties Treatment Plan.</b> After completing the inventory and avoidance phase of site design, SDG&E will prepare and submit for approval a Historic Properties Treatment Plan (HPTP) to avoid or mitigate identified potential impacts.  | <b>1c. – Develop and Implement Historic Properties Treatment Plan.</b> After completing the inventory and avoidance phase of site design, SDG&E will prepare and submit to the Forest Service HPM and CPUC for approval a Historic Properties Treatment Plan (HPTP) to avoid or mitigate identified potential impacts. <u>The HPTP will be developed in accordance with APM CUL-06.</u>  |
| 139.      | D.5.3.3 Direct and Indirect Impacts           | D.5-45 | MM CUL-1 1e  | When a cultural resource discovery is made, the monitor will stop work and notify the Principal Investigator (PI) who will notify the HPM or CPUC representative. The measure as written is inconsistent with APM CUL-04.  | <b>1e. – Monitor construction activities.</b> Incorporate monitoring as described in AMP CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.  | <b>1e. – Monitor construction activities.</b> Incorporate monitoring as described in <del>AMP</del> <u>APM</u> CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify <u>the PI, who will notify</u> the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.   |
| 140.      | D.5.3.3 Direct and Indirect Impacts           | D.5-45 | MM CUL-2   | SDG&E’s responsibility for electric distribution ends at the meter. SDG&E has no control or enforcement over what is installed on or within buildings beyond the metering equipment. This measure should clarify that any equipment placed beyond the meter is not subject to this measure.  |  |  |
| 141.      | D.5.3.3 Direct and Indirect Impacts           | D.5-49 | MM CUL-3   | This measure is duplicative of APM CUL-05. In accordance with and as stated in APM CUL-05:<br>“SDG&E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources Technical Report.”<br>All measures identified and described in the Technical Report will be implemented to the extent reasonably feasible and overseen by a qualified archaeologist approved by the CPUC and USFS. | <b>MM CUL-3</b> During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. | <b>MM CUL-3</b> During construction of the proposed power line replacement projects <u>and in accordance with APM CUL-05</u> , all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011, <u>revised 2013</u> ) shall be implemented <u>to the extent reasonably feasible</u> . <u>Implementation of all <del>AM</del> measures shall be implemented-overseen</u> by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. |
| 142.      | D.5.3.3 Direct and Indirect Impacts           | D.5-49 | Third paragraph (under Operations and Maintenance) | Footpaths will also be required at those locations not accessed by truck. Please revise as provided.   | No impacts to archaeological resources are anticipated during operations and maintenance activities for the proposed power line replacement projects since vehicles and crew would stay within the access roads and previously disturbed areas.  | No impacts to archaeological resources are anticipated during operations and maintenance activities for the proposed power line replacement projects since vehicles and crew would stay within the access roads, <u>approved footpaths</u> , and previously disturbed areas.   |
| 143.      | Section D.5.4.3 C440 Mount Laguna Underground | D.5-57 |  | While some of the underground route proposed by the USFS along C440 has been assessed for potential impacts to cultural resources, impacts to cultural resources would depend on the USFS proposed route and final design,   |  |  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name   | Page # | Paragraph or Table # | General Comment  | Specific Comment  |                  |
|-----------|--|--------|----------------------|--|-------------------|------------------|
|           |  |        |                      |  | Existing Language | Revised Language |
|           | Alternative  |        |                      | <p>including secondary lines, takeoffs, and riser poles needed to connect the new undergrounded facilities to the main underground line. Due to the nature of distribution line routing and its necessary connection to customers, not all undergrounding will be within paved roadways.</p> <p>All cultural resources listed in the Cultural Resources Technical Report for C440 and determined to be within the Project Area of Direct Impact would be potentially impacted if the entire alignment is undergrounded. This would include several sites that have been formally evaluated for the National Register of Historic Places and California Register of Historic Resources and determined eligible for listing.</p> |                   |                  |
| 144.      | Section D.5.6.1<br>Partial<br>Removal of<br>Overland<br>Access Roads | D.5-59 | Second<br>paragraph  | If overland access roads are removed, SDG&E would be required to maintain poles using helicopters. As a result, permanent landing zones as well as temporary staging areas and footpaths would be required. The impacts for these areas should be discussed.   |                   |                  |

| Comment # | Section Name  | Page # | Paragraph or Table #  | General Comment  | Specific Comment  |   |
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|           |   |        |   |  | Existing Language   | Revised Language  |
| 145.      | D.5.9<br>Mitigation Monitoring, Compliance, and Reporting | D.5-62 | Table D.5-15<br>Mitigation Monitoring, Compliance, and Reporting – Cultural and Paleontological Resources | MM CUL-1 in this table is inconsistent with MM CUL-1 in Section D.5.3.3 Page 44.   | <p>...</p> <p><b>1a – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE).</b> Prior to any ground disturbing activities, SDG&amp;E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall supplement surveys done for the EIR/EIS and will satisfy Section 106 requirements.</p> <p><b>1b. – Avoid and protect potentially significant resources.</b> Where feasible, complete avoidance of impacts shall be the preferred strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a Historic Properties Treatment Plan as described below.</p> <p><b>1c. – Develop and Implement Historic Properties Treatment Plan.</b> After completing the inventory and avoidance phase of site design, SDG&amp;E will prepare and submit for approval a Historic Properties Treatment Plan (HPTP) to avoid or mitigate identified potential impacts.</p> <p><b>1d. – Conduct data recovery to reduce adverse effects.</b> If eligible resources, as determined by the federal agencies and the SHPO, cannot be protected from direct impacts of the project or alternatives, data-recovery investigations shall be conducted by SDG&amp;E to reduce adverse effects to the characteristics of each property that contribute to its eligibility, using procedures described in the HPTP.</p> <p><b>1e. – Monitor construction activities.</b> Incorporate monitoring as described in AMP CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.</p> | <p>...</p> <p><b>1a – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE).</b> Prior to any ground disturbing activities, SDG&amp;E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall <u>cover only those portions of the Proposed Project APE not previously surveyed, to serve as a supplement to surveys done for the EIR/EIS, and will</u> satisfy Section 106 requirements.</p> <p><b>1b. – Avoid and protect potentially significant resources.</b> Where feasible, complete avoidance of impacts shall be the preferred strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a Historic Properties Treatment Plan as described below.</p> <p><b>1c. – Develop and Implement Historic Properties Treatment Plan.</b> After completing the inventory and avoidance phase of site design, SDG&amp;E will prepare and submit <u>to the Forest Service HPM and CPUC</u> for approval a Historic Properties Treatment Plan (HPTP) to avoid or mitigate identified potential impacts. <u>The HPTP will be developed in accordance with APM CUL-06.</u></p> <p><b>1d. – Conduct data recovery to reduce adverse effects.</b> If eligible resources, as determined by the federal agencies and the SHPO, cannot be protected from direct impacts of the project or alternatives, data-recovery investigations shall be conducted by SDG&amp;E to reduce adverse effects to the characteristics of each property that contribute to its eligibility, using procedures described in the HPTP.</p> <p><b>1e. – Monitor construction activities.</b> Incorporate monitoring as described in <del>AMP</del> <u>APM</u> CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify <u>the PI, who will notify</u> the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.</p> |
| 146.      | D.5.9<br>Mitigation Monitoring, Compliance, and Reporting | D.5-62 | Table D.5-15<br>Mitigation Monitoring, Compliance, and Reporting  | <b>Compliance Documentation and Consultation (a through e) – Please clarify who is responsible for approval of deliverables.</b> | <p>a. Approval of Final APE surveys</p> <p>b. Approval of final designs documenting avoidance.</p> <p>c. Approval of HPTP</p> <p>d. Approval of recovery plans</p>  | <p>a. [Identify specific agencies] approval of Final APE surveys</p> <p>b. [Identify specific agencies] approval of final designs documenting avoidance.</p>  |

| Comment #                             | Section Name   | Page # | Paragraph or Table #   | General Comment  | Specific Comment   |  |
|---------------------------------------|--|--------|--|--|--|--|
|                                       |  |        |  |  | Existing Language  | Revised Language   |
|                                       |  |        | – Cultural and Paleontological Resources   |  | e. Monitor construction activities and data recovery.  | c. [Identify specific agencies] approval of HPTP<br>d. [Identify specific agencies] approval of recovery plans<br>e.[Identify specific agencies] Monitor construction activities and data recovery.  |
| 147.                                  | D.5.9 Mitigation Monitoring, Compliance, and Reporting | D.5-63 | Table D.5-15 Mitigation Monitoring, Compliance, and Reporting – Cultural and Paleontological Resources | Please make this table consistent with proposed text changes provided previously for this measure.   | <b>MM CUL-3</b> During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. | <b>MM CUL-3</b> During construction of the proposed power line replacement projects <u>and in accordance with APM CUL-05</u> , all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011, <u>revised 2013</u> ) shall be implemented <u>to the extent reasonably feasible</u> . <u>Implementation of all</u> <del>AM</del> measures shall be <del>implemented</del> <u>overseen</u> by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. |
| 148.                                  | D.5.9 Mitigation Monitoring, Compliance, and Reporting | D.5-63 | Table D.5-15 Mitigation Monitoring, Compliance, and Reporting – Cultural and Paleontological Resources | Compliance Documentation (a) and Timing (a) may also occur post-construction. Please revise as provided.   | <b>Timing (a)</b> Prior to and during construction   | <b>Timing (a)</b> Prior to and during construction <u>and post-construction</u>  |
| <b>D.6 – Greenhouse Gases</b>         |  |        |  |  |  |  |
| 149.                                  | SDG&E has no comments on this section.                 |        |  |  |  |  |
| <b>D.7 – Public Health and Safety</b> |  |        |  |  |  |  |
| 150.                                  | D.7 Public Health and Safety                           | D.7-1  | First paragraph  | SDG&E believes the reference to Section D.5.7 is incorrect and should be D.7.7   | Section D.5.7 discusses the No Action Alternative and Section D.7.8 describes the No Project Alternative.  | Section <u>D.7.7</u> <del>D.5.7</del> discusses the No Action Alternative and Section D.7.8 describes the No Project Alternative.  |
| 151.                                  | Section D.7.2.2 State Laws and Regulations             | D.7-10 | Last paragraph   | This section accurately quotes the CPUC requirements for inspection, maintenance, and brushing for which SDG&E needs access. If existing access roads are removed with the expectation of maintaining access using helicopters, then landing zones, staging areas, and foot paths would be required to remain compliant with CPUC inspection requirements. |  |  |

| Comment # | Section Name                        | Page # | Paragraph or Table # | General Comment   | Specific Comment   |  |
|-----------|-------------------------------------|--------|----------------------|---|--|--|
|           |                                     |        |                      |   | Existing Language  | Revised Language   |
| 152.      | D.7.2.2 State Laws and Regulations  | D.7-11 | Third paragraph      | Rule 35, Tree Trimming, of CPUC General Order 95 provides the recommended clearances to be achieved during tree trimming according to specific line voltages; the revised minimum clearances provided in Rule 35 are greater in extreme and high fire threat zones than those cited in the Draft EIR/EIS. SDG&E will attain clearances greater than the minimum requirements to address annual growth compliance, environmental conditions, and any structural defects or tree species growth with the goal of maintaining the minimum approach distances allowed under CPUC General Order 95 Rule 35 and Public Resources Code Section 4293. | Rule 35, Tree Trimming, defines minimum vegetation clearance around power lines. Rule 35 guidelines, at the time of trimming, require the following:<br><input type="checkbox"/> Four-foot [4-foot] radial clearances for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts<br><input type="checkbox"/> Six-foot [6-foot] radial clearances for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts<br><input type="checkbox"/> Ten-foot [10-foot] radial clearances for any conductor of a line operating at 110,000 volts or more, but less than 300,000 volts (this would apply to SDG&E's proposed project)<br><input type="checkbox"/> Fifteen-foot [15-foot] radial clearances for any conductor of a line operating at 300,000 volts or more. | Rule 35, Tree Trimming, defines <u>recommended</u> minimum vegetation clearance around power lines. Rule 35 guidelines, at the time of trimming, require the following:<br><input type="checkbox"/> Four-foot [4-foot] radial clearances for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts ( <u>this would apply to SDG&amp;E's Proposed Project</u> )<br><input type="checkbox"/> Six-foot [6-foot] radial clearances for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts<br><input type="checkbox"/> Ten-foot [10-foot] radial clearances for any conductor of a line operating at 110,000 volts or more, but less than 300,000 volts ( <del>this would apply to SDG&amp;E's proposed project</del> )<br><input type="checkbox"/> Fifteen-foot [15-foot] radial clearances for any conductor of a line operating at 300,000 volts or more.<br><u>SDG&amp;E will achieve post-trim clearances considering factors such as annual compliance, environmental conditions, line movement, proper pruning standards, species' potential growth, and structural defects with the goal of maintaining the minimum approach distances allowed per CPUC General Order 95, Rule 35 and California Public Resources Code Section 4293.</u> |
| 153.      | D.7.3.3 Direct and Indirect Effects | D.7-15 | MM PHS-2             | SDG&E believes the reference in this section should be to 40 CFR 355, not 335. Additionally, the measure should be clarified as provided to allow for temporary storage of materials up to the threshold permissible by law.  | No hazardous material as define by 40 CFR 335 shall be stored on site, and all vehicle maintenance activities shall be conducted off site at designated locations specified for this activity.   | No hazardous material, as defined by 40 CFR <del>335-355</del> , shall be stored on site <u>above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355.</u> <del>and all</del> All vehicle maintenance activities shall be conducted off site at designated locations specified for this activity.  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                        | Page # | Paragraph or Table #  | General Comment  | Specific Comment  |   |
|-----------|-------------------------------------|--------|---|--|---|---|
|           |                                     |        |   |  | Existing Language   | Revised Language  |
| 154.      | D.7.3.3 Direct and Indirect Effects | D.7-15 | MM PHS-2  | Vehicle maintenance activities are typically conducted at designated locations within approved staging areas, which have been outfitted with the necessary containment and safety materials in-place to prevent hazardous materials releases that could result from these activities. When vehicles break down on-site, however, some level of maintenance is typically required at the location where the vehicle has ceased to operate – loading the disabled vehicle onto a flatbed truck or other conveyance is infeasible and may result in additional impacts. SDG&E recommends that this measure be revised to clarify that regular maintenance activities will be conducted at designated locations within approved staging areas, and that some emergency maintenance activities may be required on-site. | No hazardous material as define by 40 CFR 335 shall be stored on site, and all vehicle maintenance activities shall be conducted off site at designated locations specified for this activity. SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction.  | No hazardous material, as defined by 40 CFR <del>335-355</del> , shall be stored on site <u>above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355, and all</u> All vehicle maintenance activities shall be conducted <del>off-site</del> at designated locations <u>within approved staging areas or other locations</u> specified for this activity. <u>In the event emergency maintenance is required on site, or removal of the equipment to an off-site repair facility is determined by SDG&amp;E to be infeasible, SDG&amp;E will use BMPs to prevent the release of hazardous materials during these emergency maintenance activities.</u> SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction. |
| 155.      | D.7.3.3 Direct and Indirect Effects | D.7-18 | Table D.7-1 Public Health and Safety Impacts Associated with SDG&E's Proposed Project | The entry for C157 states that this distribution line passes next to Camp Barrett. Camp Barrett is a juvenile correction facility, not a school, and wards committed to this facility are not permitted access outside of camp grounds. Because C157 is not located within camp grounds at this facility, no potential for impact exists at this location. SDG&E recommends this entry be removed from Table D.7-1 in its entirety.  |   |   |
| 156.      | D.7.3.3 Direct and Indirect Effects | D.7-19 | MM PHS-4  | TL629 spans but does not include any poles or work areas located within the Pine Valley Trailer Park contamination plume. Because of this, no ground disturbance from Proposed Project activities is anticipated to occur in this area. Crews may be required to pass between poles Z173105 and Z173109, however; as a result, SDG&E recommends this measure be revised to restrict ground-disturbing activities in this area only.<br><br>Additionally, only crews working on TL629—not the entire Proposed Project—will be in the vicinity of this location and require training.  | Prior to construction, all San Diego Gas & Electric (SDG&E), contractor, and subcontractor project personnel shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid the area.   | Prior to construction, all <del>San Diego Gas &amp; Electric</del> (SDG&E), contractor, and subcontractor project personnel <u>anticipated to work between poles Z173105 and Z173109</u> shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid <u>any ground disturbance in the area.</u>  |
| 157.      | D.7.3.3 Direct and Indirect Effects | D.7-20 | Second paragraph  | Please revise this section as provided.  | SDG&E's proposed project would require occasional, short-term helicopter support during construction, operations, and maintenance. Temporary use of helicopters is not expected to interfere with air traffic patterns. However, if helicopters are used for the installation or removal of structures, MM PHS-5 and MM PHS-6 will apply and will ensure that helicopter use follows all safety procedures in compliance with FAA regulations (MM PHS-5 supersedes APM-06). With implementation of these measures, adverse and significant impacts to air traffic patterns and air safety | SDG&E's proposed project would require occasional, short-term helicopter support during construction, operations, and maintenance. Temporary use of helicopters is not expected to interfere with <u>other</u> air traffic <del>patterns</del> . However, if helicopters are used for the installation or removal of structures, MM PHS-5 and MM PHS-6 will apply and will ensure that helicopter use follows all safety procedures <u>and is</u> in compliance with FAA regulations (MM PHS-5 supersedes APM-06). With implementation of these measures, <del>adverse and significant</del> impacts to air traffic <del>patterns and air</del>   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                        | Page # | Paragraph or Table # | General Comment   | Specific Comment  |   |
|-----------|-------------------------------------|--------|----------------------|---|---|---|
|           |                                     |        |                      |   | Existing Language   | Revised Language  |
|           |                                     |        |                      |   | due to the use of helicopters would be mitigated under NEPA and less than significant with mitigation under CEQA (Class II).  | <del>safety</del> due to the use of helicopters would be mitigated under NEPA and less than significant with mitigation under CEQA (Class II).  |
| 158.      | D.7.3.3 Direct and Indirect Effects | D.7-20 | MM PHS-5             | SDG&E routinely coordinates with local air traffic control and complies with all applicable FAA regulations regarding helicopter use. Documentation can be provided to the CPUC during the construction phase of the Proposed Project, but this documentation requirement is unnecessarily burdensome during operations and maintenance and should not apply following construction completion. Further, SDG&E's Aviation Operations Manual satisfies this requirement for all work conducted within the CNF boundary. All projects are reviewed by the USFS before work; therefore, the helicopter component of any particular action is captured during that review process. Please revise accordingly. | Prior to flight operations for helicopter use during construction as well as operations, San Diego Gas & Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration (FAA) regulations regarding helicopter use to prevent conflicts with air traffic generated by local airstrips. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction and operations and maintenance activities. SDG&E shall prepare an Aviation Safety Plan for Forest Service approval prior to any use of helicopters in support of activities on the Cleveland National Forest. The Aviation Safety Plan will outline the procedures used to ensure safe transportation of external loads, and will identify coordination requirements with Forest Service aviation resources operating in the area. | <del>Prior to flight operations for helicopter use during in support of Proposed Project construction as well as and ongoing operations and maintenance, San Diego Gas &amp; Electric (SDG&amp;E) shall coordinate with local air traffic control the Federal Aviation Administration (FAA) if necessary and will comply with all relevant Federal Aviation Administration (FAA) regulations regarding helicopter operations. use to prevent conflicts with air traffic generated by local airstrips. Documentation verifying SDG&amp;E has, when necessary, coordinated with local air traffic control the FAA will shall be provided to the California Public Utilities Commission prior to use of helicopters for construction and operations and maintenance activities. SDG&amp;E shall prepare an Aviation Safety Plan for Forest Service approval will submit its Aviation Operations Manual to the Forest Service prior to any use of helicopters in support of its activities on the Cleveland National Forest. The Aviation Safety Plan Operations Manual will outlines the procedures used to ensure safe transportation of external loads, as well as other safety and procedural requirements for helicopter operations. Coordination will also be made, and will identify coordination requirements with Forest Service aviation resources operating in the area.</del> |
| 159.      | D.7.3.3 Direct and Indirect Effects | D.7-20 | MM PHS-6             | SDG&E does not notify the CPUC regarding helicopter use during operation and maintenance activities. SDG&E will prepare and provide a Helicopter Lift Plan in accordance with SDG&E's Aviation Operations Manual. Please revise this measure as provided.   | Should helicopters be required to lift any structures, San Diego Gas & Electric (SDG&E) shall prepare a Helicopter Lift Plan to outline helicopter operations and safety procedures for the project. The Helicopter Lift Plan will be prepared consistent with applicable FAA regulations pertaining to these operations and consistent with SDG&E avian safety standards included in SDG&E's Aviation General Operations Manual. The Helicopter Lift Plan will be provided to the California Public Utilities Commission (CPUC) prior to initiating activities.  | <del>If, during initial construction, it is anticipated or planned that helicopters will be used for external load operations, including carrying structures, SDG&amp;E will prepare Should helicopters be required to lift any structures, San Diego Gas &amp; Electric (SDG&amp;E) shall prepare a Helicopter Lift Plan. This plan will be prepared in accordance and comply with all relevant FAA regulations, as well as SDG&amp;E's Aviation Operations Manual. to outline helicopter operations and safety procedures for the project. The Helicopter Lift Plan will be prepared consistent with applicable FAA regulations pertaining to these operations and consistent with SDG&amp;E avian safety standards included in SDG&amp;E's Aviation General Operations Manual. For initial construction, the The Helicopter Lift Plan will be provided to the California Public Utilities Commission (CPUC) prior to initiating activities.</del>  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                        | Page #        | Paragraph or Table #                     | General Comment   | Specific Comment   |   |
|-----------|-------------------------------------|---------------|--|---|--|---|
|           |                                     |               |  |   | Existing Language  | Revised Language  |
| 160.      | D.7.3.3 Direct and Indirect Effects | D.7-21        | Fifth paragraph (under Extreme Weather)  | The term “associated facilities” is broad and could be interpreted to mean underground facilities coming off of a pole, which would be incorrect in this context. SDG&E recommends changing “associated facilities” to “associated hardware” as used elsewhere in the section to tie the discussion to the poles/hardware only. | While wind speeds in the study area have been observed to 115 mph (Schroeder et al. 1964), and the proposed steel poles would be subject to increased risk of lightning strikes due to their composition and increased height, SDG&E will be required as discussed in Section D.7.2.2, State Laws and Regulations, and in Section D.8, Fire and Fuels Management, of this EIR/EIS, to design the proposed new steel poles and associated facilities in accordance with the safety requirements of the CPUC’s General Order 95 (GO 95).   | While wind speeds in the study area have been observed to 115 mph (Schroeder et al. 1964), and the proposed steel poles would be subject to increased risk of lightning strikes due to their composition and increased height, SDG&E will be required as discussed in Section D.7.2.2, State Laws and Regulations, and in Section D.8, Fire and Fuels Management, of this EIR/EIS, to design the proposed new steel poles and associated <del>facilities</del> hardware in accordance with the safety requirements of the CPUC’s General Order 95 (GO 95).  |
| 161.      | D.7.3.3 Direct and Indirect Effects | D.7-21 and 22 | Sixth paragraph (under Seismic Activity) | This section, as currently written, is inaccurate. Please revise as provided.   | Strong earthquake-induced ground shaking can result in damage to aboveground structures. Transmission lines are designed to withstand strong ground shaking and moderate ground-deformation impacts associated with strong seismic shaking. However, unsafe conditions could occur along the project alignment should power lines or poles break due to moderate to high levels of ground shaking or liquefaction in the area. Implementation of MM PHS-7 and MM PHS-8 would reduce impacts associated with ground shaking and liquefaction because they would ensure that the project adhere to all applicable engineering design and construction codes that would reduce adverse effects resulting from fault rupture both during construction and operational phase. | Strong earthquake-induced ground shaking <del>can</del> <u>could</u> potentially result in damage to aboveground structures. <del>Transmission lines are designed to withstand strong ground shaking and moderate ground deformation impacts associated with strong seismic shaking. However, unsafe conditions could occur along the project alignment should power lines or poles break due to moderate to high levels of ground shaking or liquefaction in the area. Currently, GO 95 and NESC contain no provisions or requirements for seismic loading, but instead focus on loading requirements based on effects of wind-, ice-, gravity, conductor-, and temperature-induced loading. ASCE Manual 74 “Guidelines for Electrical Transmission Line Loading” similarly has no provisions for seismic loading, but does comment that power line structures are not typically designed for seismic loading, and that wind/ice combinations and broken wire loadings generally exceed design earthquake loads. SDG&amp;E avoids structure and foundation locations on seismic faults, and also designs for earthquake-induced soil liquefaction effects if foundations are located in soils prone to liquefaction.</del> Implementation of MM PHS-7 and MM PHS-8 would reduce impacts associated with ground shaking and liquefaction because they would ensure that the project adhere to all applicable engineering design and construction codes that would reduce adverse effects resulting from fault rupture both during construction and operational phase. |
| 162.      | D.7.3.3 Direct and Indirect Effects | D.7-22        | MM PHS-7                                 | Geotechnical hazards would have an effect on 69 kV power line foundations and access roads, but the California Building Code (CBC) does not apply to pole foundations nor access roads. Additionally, IEEE does not contain requirements for pole foundations. SDG&E would follow   | The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate   | The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction  |

| Comment # | Section Name   | Page # | Paragraph or Table #   | General Comment  | Specific Comment  |  |
|-----------|--|--------|--|--|---|--|
|           |  |        |  |  | Existing Language   | Revised Language   |
|           |  |        |  | CBC requirements for any retaining walls that are designed for access roads and structured maintenance pads, however, regardless of the potential for geotechnical hazards in the areas where these facilities are located. Evaluation of geologic hazards would have an effect on the soil parameters used for retaining wall design to meet CBC requirements. Electrical Power Research Institute’s “Moment Foundation Analysis and Design” (EPRI MFAD) also contains appropriate requirements for standard power line design. Within that document, provisions are made to determine input parameters for the micropile foundation designs. These input parameters would appropriately reflect the very low design capacities of soils affected by geologic hazards such as seismic liquefaction. Additionally, the requirements of CPUC General Order 95 will also be met. Please revise this measure as provided. | engineering design and construction measures that meet California Building Code (CBC) and Institute of Electrical and Electronics Engineers (IEEE) design parameters shall be incorporated into the project designs. Appropriate measures for project facilities could include construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in underground cables to allow ground deformations without damage to structures.   | measures that meet <u>CPUC General Order 95 and California Building Code (CBC)</u> , and <u>Institute of Electrical and Electronics Engineers (IEEE), and Electric Power Research Institute (EPRI) Moment Foundation Analysis and Design</u> design parameters shall be incorporated into the project designs. <del>Appropriate measures for project facilities could include construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in underground cables to allow ground deformations without damage to structures.</del>   |
| 163.      | D.7.3.3 Direct and Indirect Effects                    | D.7-22 | MM PHS-8   | SDG&E recommends that this measure be clarified to state that a qualified SDG&E employee may also perform any necessary facility inspections required by the measure. Further, SDG&E standard practice is to inspect all poles within an identified area of effect following a seismic event as described in the measure. Evaluating all poles included in the Proposed Project is unreasonable and unnecessary given the size and geographic range of the Proposed Project. Please provide a list of poles that would be included under this measure and specify a maximum distance from epicenter that would trigger this measure (e.g., all Proposed Project poles within 10 miles of the epicenter)—the Elsinore Fault Zone extends more than 110 miles, so a geographic limitation to this measure is prudent.  | If large levels of ground shaking (such as Modified Mercalli Intensity VI or greater) are experienced or a major earthquake (magnitude 6.0 and above) occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer hired by the project applicant shall perform facilities inspections as quickly as possible. Careful examination shall be conducted of all project facilities. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised. | If large levels of ground shaking (such as Modified Mercalli Intensity VI or greater) are experienced or a major earthquake (magnitude 6.0 and above) occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer <del>hired by the project applicant</del> <u>employed or contracted by SDG&amp;E</u> shall perform facilities inspections as quickly as possible. Careful examination shall be conducted of all project facilities <u>within the identified area of effect</u> . Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised. |
| 164.      | D.7.3.3 Direct and Indirect Effects                    | D.7-22 | Fourth paragraph   | Please revise as provided to ensure underground work is also included in this statement.   | Based on the conservative nature of the specification in CPUC’s GO 95, operation and maintenance of the proposed power line replacement projects along with all facilities proposed to be covered under the MSUP would not pose a significant safety hazard due to structural failure precipitated by extreme weather (high winds, lighting).   | Based on the conservative nature of the specification in CPUC’s GOs <u>95 and 128</u> , operation and maintenance of the proposed power line replacement projects along with all facilities proposed to be covered under the MSUP would not pose a significant safety hazard due to structural failure precipitated by extreme weather (high winds, lighting).   |
| 165.      | D.7.9 Mitigation Monitoring, Compliance, and Reporting | D.7-34 | Table D.7-2 Mitigation Monitoring, Compliance, and Reporting – Public Health | Please revise this section as provided.  | a. Prepare an Aviation Safety Plan as defined in measure<br>b. Documentation showing coordination with Forest Service aviation resources as defined in plan, local air traffic control, and compliance with all applicable  | a. <del>Prepare an Aviation Safety Plan</del> <u>Provide Aviation Operations Manual</u> as defined in measure<br>b. Documentation showing coordination with Forest Service aviation resources <del>as defined in plan, local air traffic control, and compliance with all applicable</del> <u>the</u>  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment #                              | Section Name   | Page #        | Paragraph or Table #  | General Comment  | Specific Comment  |   |
|--|--|---------------|---|--|---|---|
|  |  |               |   |  | Existing Language   | Revised Language  |
|  |  |               | and Safety  |  | FAA regulations.<br>c. CPUC/Forest Service Monitor: Line item in compliance monitoring report | FAA <del>when necessary</del> <del>regulations</del> .<br>c. CPUC/Forest Service Monitor: Line item in compliance monitoring report |
| 166.                                   | D.7.9 Mitigation Monitoring, Compliance, and Reporting | D.7-34        | Table D.7-2 Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety | Please revise the Location section as provided.  | All construction work areas for SDG&E’s proposed project and all alternatives.                | All construction work areas for SDG&E’s proposed project and all alternatives <u>locations</u> .                                    |
| <b>D.8 – Fire and Fuels Management</b> |  |               |   |  |   |   |
| 167.                                   | D.8.1.1 General Overview                               | D.8-16        | First paragraph   | SDG&E is not aware of a “Lake Henshaw Department.” Please clarify the fire department or agency to which this is referring.  |   |   |
| 168.                                   | D.8.2.1 Federal Regulations and Other Standards        | D.8-21        | Seventh paragraph (under National Fire Plan)  | The National Fire Plan applies only to the USFS’ planning and response activities for fire management. It does not apply to the Proposed Project and should be removed from the document.  |   |   |
| 169.                                   | D.8.2.1 Federal Regulations and Other Standards        | D.8-21        | Last paragraph  | The International Fire Code does not apply to the Proposed Project and should be removed from the document.  |   |   |
| 170.                                   | D.8.2.1 Federal Regulations and Other Standards        | D.8-22 and 23 | Last paragraph on D.8-22 and first paragraph on D.8-23                                  | The Cal Fire Power Line Fire Prevention Field Guide and General Order 95 supersede IEEE Standard 516-2003. References to this standard should be removed throughout the document.  |   |   |
| 171.                                   | D.8.2.1 Federal Regulations and Other Standards        | D.8-24        | Sixth paragraph (under Forest Service Special Use Permit Requirements)                  | This section refers to several “clauses” that identify various fire safety requirements. Please clarify the document containing these clauses.   |   |   |
| 172.                                   | D.8.2.1 Federal Regulations and Other Standards        | D.8-24        | Sixth paragraph (under Forest Service Special Use Permit Requirements)                  | Clause F-15, as described in this section, would conflict with other guidance, mitigation measures, and vegetation management procedures used by SDG&E as well as provided elsewhere in the document. Please clarify how and when this clause would apply and be implemented for the Proposed Project. |   |   |
| 173.                                   | D.8.2.3 Regional Policies, Plans, and                  | D.8-31        | Last paragraph (under Southwest Powerlink   | This MOU does not apply to the Proposed Project. This section should be removed in its entirety.   |   |   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



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|           |                                     |        |                              |  | Existing Language  | Revised Language   |
|           | Regulations                         |        | Memorandum of Understanding) |  |  |  |
| 174.      | D.8.3.3 Direct and Indirect Effects | D.8-40 | MM FF-1                      | This measure, as currently written, is ambiguous regarding what activity will be completed “to the satisfaction of the lead agencies” and which agencies will be approving the plan. Further, the first and last paragraphs of the measure conflict regarding which agencies will be reviewing and approving the plan. SDG&E recommends revising the text as provided for consistency and clarity.   | SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service, Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of lead agencies. SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&E. | SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service, Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) <del>to the satisfaction of lead agencies.</del> SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the <del>commenting agencies</del> <u>Forest Service and CPUC</u> prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&E.  |
| 175.      | D.8.3.3 Direct and Indirect Effects | D.8-41 | MM FF-1                      | As currently written, this measure restricts all non-essential, non-emergency construction and maintenance activities when the CNF is considered PAL E; SDG&E is currently working within the CNF under the Sunrise Powerlink O&M Plan, which allows for certain activities during PAL E days. This measure should be clarified to explain that the designation only applies to the specific fire danger rating area in which it has been declared (not across the entire CNF), and that the only activities to which the PAL E restriction applies are vegetation manipulation, road grading, and metal welding/grinding/cutting. Further, SDG&E must be allowed to return the system from a compromised state (e.g., energized lines may be returned from temporary structures to existing, insulated structures) regardless of PAL level to ensure safety and system reliability.<br><br>SDG&E recommends removing the hot work procedure discussion from this bullet and making it a separate bullet.<br><br>SDG&E requests that the Fire Plan also include standard variances to PAL E that may be used to allow specific activities, as well as any additional mitigation measures required to allow these activities, similar to what SDG&E has proposed and the USFS is currently evaluating in the CNF O&M Fire Plan. | <ul style="list-style-type: none"> <li>During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest Service Project Activity Level (PAL) is “E” on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under a Hot Work Procedure. The Hot Work Procedure will be in compliance with the applicable sections in NFPA 51-B “Fire prevention during welding, cutting, or other hot work” and CFC Chapter 26 “Welding and other Hot Work.”</li> </ul>           | <ul style="list-style-type: none"> <li>During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest Service Project Activity Level (PAL) is “E” on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency construction and maintenance activities <u>restricted under PAL E</u> shall cease <u>within the specific fire danger rating area(s) in which PAL E has been declared.</u> <del>This measure does not apply to activities necessary to return the system from a compromised state, or be required to operate under a Hot Work Procedure. The Hot Work Procedure will be in compliance with the applicable sections in NFPA 51-B “Fire prevention during welding, cutting, or other hot work” and CFC Chapter 26 “Welding and other Hot Work.”</del></li> <li><u>Hot Work procedures will be conducted in compliance with the applicable sections in NFPA 51-B “Fire prevention during welding, cutting, or other hot work” and CFC Chapter 26 “Welding and other Hot Work.”</u></li> </ul> |
| 176.      | D.8.3.3 Direct and Indirect Effects | D.8-41 | Second bullet                | SDG&E recommends removing this bullet in its entirety. The requirements listed under this section apply to fire departments and fire protection agencies, and would not apply in any circumstance to SDG&E or the Proposed   | Requirements of Title 14 of the California Code of Regulations, 918 “Fire Protection” for the private land portions  | <del>Requirements of Title 14 of the California Code of Regulations, 918 “Fire Protection” for the private land portions</del>   |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



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|           |                                     |        |                                    |   | Existing Language   | Revised Language  |
|           |                                     |        |                                    | Project.  |   |   |
| 177.      | D.8.3.3 Direct and Indirect Effects | D.8-41 | Introduction to second bullet list | Please revise this text as provided.  | Additional restrictions will include the following:   | Additional <del>restrictions</del> <u>conditions</u> will include the following:  |
| 178.      | D.8.3.3 Direct and Indirect Effects | D.8-41 | Eighth bullet                      | SDG&E Standard Practice 113-1 already includes stringent requirements for fire patrols that will be followed during project construction. As a result, this bullet point is redundant and should be removed in its entirety.  | During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily construction and hotwork.   | <del>During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily construction and hotwork.</del>  |
| 179.      | D.8.3.3 Direct and Indirect Effects | D.8-41 | Ninth bullet                       | Please revise this text as provided.  | Fire Suppression Resource Inventory – In addition to 14 CCR 918.1(a), (b), and (c), the applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE. | Fire Suppression Resource Inventory – <del>In addition to 14 CCR 918.1(a), (b), and (c), the</del> <u>The</u> applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis <u>during Proposed Project construction</u> and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE.   |
| 180.      | D.8.3.3 Direct and Indirect Effects | D.8-42 | MM FF-1                            | SDG&E believes the last paragraph on this page may be erroneously included by page formatting as part of the last bullet point. The last paragraph should be left-adjusted accordingly to demonstrate that it is not part of the last bullet point.<br>SDG&E periodically updates its Electrical Standard Practice (ESP) 113.1 to incorporate lessons learned, emerging technologies, and other innovations in order to ensure that the highest levels of wildland fire safety and fire prevention are being implemented. Due to the extended length of the Proposed Project’s anticipated construction timeline, ESP 113.1 will likely be updated while construction is ongoing. SDG&E recommends revising this MM to allow for incorporating updates to ESP 113.1 as they become available and upon the approval of the USFS. | All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.   | All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments. <u>SDG&amp;E may periodically update the Construction Fire Prevention/Protection Plan to incorporate lessons learned or other improvements to wildland fire safety and fire prevention, including updates to SDG&amp;E’s Electrical Standard Practice 113.1, upon the approval of the Forest Service.</u> |
| 181.      | D.8.3.3 Direct and Indirect Effects | D.8-42 | First paragraph                    | The requirement to report fires immediately upon ignition is infeasible, as SDG&E may not be immediately aware of fires as they start. This statement should be revised as provided.  | All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition.   | All fires shall be reported to the fire agencies with jurisdiction in the project area <del>immediately upon ignition</del> <u>as soon as the fire is identified/discovered.</u>  |

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|           |                                     |        |                      |   | Existing Language   | Revised Language   |
| 182.      | D.8.3.3 Direct and Indirect Effects | D.8-42 | Second bullet        | Please revise this text as provided. Hard hat decals are a more effective method of assuring compliance and have proven more effective in keeping this information readily available for crews. Additionally, collecting and destroying all previously distributed cards/decals is unrealistic; instead, SDG&E will check the validity of crew members' information during daily compliance audits.   | Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect.   | Each crew member shall be trained in fire prevention, <del>initial attack firefighting</del> <u>small fire suppression procedures</u> , and fire reporting. Each member shall carry at all times a laminated card <u>or hard-hat decal</u> listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. <u>Contact</u> <del>Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed,</del> <u>Crew members will be instructed to remove and discard outdated cards and stickers immediately upon receipt of updates. Regular audits will be conducted to ensure all personnel have current information on their person, prior to the initiation of construction activities on the day the information change goes into effect.</u>   |
| 183.      | D.8.3.3 Direct and Indirect Effects | D.8-42 | Second bullet        | ESP 113.1 addresses the requirement that all crew members are within 100 feet of fire suppression equipment; this equipment is typically contained in a fire box as well as vehicles. As it is currently worded, SDG&E would be required to park vehicles every 100 feet in all work areas, which is infeasible and would create additional safety hazards. Please revise this text as provided.  | Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each crew member shall at all times be within 100 feet of a vehicle containing equipment necessary for fire suppression as outlined in the final Construction Fire Prevention/Protection Plan.  | Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each crew member shall at all times be within <del>100</del> <u>40-50</u> feet of a <del>vehicle containing equipment necessary for fire suppression</del> <u>equipment</u> , as outlined in <del>the final Construction Fire Prevention/Protection Plan</del> <u>ESP 113.1</u> .  |
| 184.      | D.8.3.3 Direct and Indirect Effects | D.8-42 | MM FF-1              | The last paragraph of this measure states that the draft plan will be provided to the "responsible fire agencies" for comment a minimum of 90 days prior to the start of any construction activities. However, the measure does not include a timeframe for when SDG&E will receive the comments or an approval timeline for the plan. Since six agencies will review the plan, SDG&E would prefer that construction not be unnecessarily delayed due to an undefined review and comment period. Please revise as provided. | SDG&E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The final plan will be approved by the responsible lead agencies with input from the fire and permitting agencies, as desired, prior to the initiation of construction activities and provided to SDG&E for implementation during all construction prior to the initiation of construction activities. All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments. | SDG&E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The final plan will be approved by the <del>responsible lead agencies</del> <u>Forest Service and CPUC within 90 days of receipt of the plan</u> , with input from the fire and permitting agencies, as desired, prior to the initiation of construction activities and <u>will be provided to SDG&amp;E for implementation during all construction prior to the initiation of construction activities. The start of construction will not be unnecessarily delayed due to extended review and comment on the plan by the reviewing agencies.</u> All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments. |
| 185.      | D.8.3.3 Direct and Indirect Effects | D.8-43 | MM FF-2              | SDG&E has been working with the USFS for more than three years on a long-term CNF O&M Fire Plan to improve consistency with and application of fire and safety requirements within the CNF. SDG&E previously provided the CNF O&M Fire Plan to the USFS, and that document is   | <del>Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan.</del> <b>Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan.</b> The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) both on and off the Cleveland   | <del>Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan.</del> <b>Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan.</b> The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) both on and off the Cleveland National   |

| Comment # | Section Name                        | Page # | Paragraph or Table # | General Comment   | Specific Comment   |   |
|-----------|-------------------------------------|--------|----------------------|---|--|---|
|           |                                     |        |                      |   | Existing Language  | Revised Language  |
|           |                                     |        |                      | currently under review by the USFS. SDG&E requests that this plan be approved and used by the USFS for O&M activities under the MSUP, and that MM FF-2 be removed. Requiring a separate plan could lead to conflicting requirements and inconsistent application. | <p>National Forest (CNF) and will be implemented during all operational maintenance work associated with the project for the life of the project, including construction operations. This plan will satisfy the requirements of the SDG&amp;E Project-Specific Fire Plan, as identified in SDG&amp;E's Electric Standard Practice 113-1. Important fire safety concepts that shall be included in the plan and make it an essential overall mitigation measure are the following:</p> <ul style="list-style-type: none"> <li>• Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans)</li> <li>• Fuel treatment area maintenance</li> <li>• When vegetation work will occur (prior to any other work activity)</li> <li>• Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread</li> <li>• Coordination procedures with fire authority</li> <li>• Integration of the project's Construction Fire Prevention/Protection Plan content</li> <li>• Personnel training and fire suppression equipment</li> <li>• Red Flag Warning restrictions for operation and maintenance work</li> <li>• Fire safety coordinator role as manager of fire prevention and protection procedures, coordinate with fire authority and educator</li> <li>• Communication protocols</li> <li>• Incorporation of responsible agency review and approved Response Plan mapping and assessment.</li> <li>• Other information as provided by responsible and commenting agencies, as applicable.</li> </ul> <p>SDG&amp;E will provide a draft copy of the Operations and Maintenance Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the completion of the first project segment. The final plan will be approved by the responsible lead agencies prior to energizing the project and provided to SDG&amp;E for implementation during all operations and maintenance activities.</p> | <p><del>Forest (CNF) and will be implemented during all operational maintenance work associated with the project for the life of the project, including construction operations. This plan will satisfy the requirements of the SDG&amp;E Project-Specific Fire Plan, as identified in SDG&amp;E's Electric Standard Practice 113-1. Important fire safety concepts that shall be included in the plan and make it an essential overall mitigation measure are the following:</del></p> <ul style="list-style-type: none"> <li><del>• Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans)</del></li> <li><del>• Fuel treatment area maintenance</del></li> <li><del>• When vegetation work will occur (prior to any other work activity)</del></li> <li><del>• Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread</del></li> <li><del>• Coordination procedures with fire authority</del></li> <li><del>• Integration of the project's Construction Fire Prevention/Protection Plan content</del></li> <li><del>• Personnel training and fire suppression equipment</del></li> <li><del>• Red Flag Warning restrictions for operation and maintenance work</del></li> <li><del>• Fire safety coordinator role as manager of fire prevention and protection procedures, coordinate with fire authority and educator</del></li> <li><del>• Communication protocols</del></li> <li><del>• Incorporation of responsible agency review and approved Response Plan mapping and assessment.</del></li> <li><del>• Other information as provided by responsible and commenting agencies, as applicable.</del></li> </ul> <p><del>SDG&amp;E will provide a draft copy of the Operations and Maintenance Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the completion of the first project segment. The final plan will be approved by the responsible lead agencies prior to energizing the project and provided to SDG&amp;E for implementation during all operations and maintenance activities.</del></p> |
| 186.      | D.8.3.3 Direct and Indirect Effects | D.8-43 | MM FF-2              | The MSUP applies only to lands within the CNF. Also, MM FF-1 includes a fire plan that will apply for construction activities, so the plan included in MM FF-2 should not cover   | The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) both on and off the Cleveland  | The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) both on and off the Cleveland National  |

Cleveland National Forest Power Line Replacement Projects  
Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
San Diego Gas & Electric Company (SDG&E) Comments



| Comment #                                | Section Name                        | Page #        | Paragraph or Table #                                       | General Comment   | Specific Comment  |   |
|--|-------------------------------------|---------------|--|---|---|---|
|  |                                     |               |  |   | Existing Language   | Revised Language  |
|  |                                     |               |  | construction activities as well. Please revise this text as provided.   | National Forest (CNF) and will be implemented during all operational maintenance work associated with the project for the life of the project, including construction operations.           | <del>Forest (CNF)</del> and will be implemented during all operational maintenance work associated with the project for the life of the project, <del>including construction operations.</del>  |
| 187.                                     | D.8.3.3 Direct and Indirect Effects | D.8-43 and 44 | Last paragraph   | Please revise this text as provided. The Proposed Project includes power lines and distribution lines that are already energized and in service; these lines are anticipated to remain in service with periodic outages during construction and, as a result, will likely be energized before completion of construction. | The final plan will be approved by the responsible lead agencies prior to energizing the project and provided to SDG&E for implementation during all operations and maintenance activities. | The final plan will be approved by the <del>responsible lead agencies</del> <u>CPUC and Forest Service</u> prior to <del>energizing the project</del> <u>the first construction segment being deemed complete</u> and the final plan will be provided to SDG&E for implementation during all operations and maintenance activities. |
| <b>D.9 – Hydrology and Water Quality</b> |                                     |               |  |   |   |   |
| 188.                                     | D.9 Hydrology and Water Quality     |               |  | “Pine Valley Creek” is referred to as “Pine Creek Valley” throughout the section. Please correct throughout document.   |   |   |
| 189.                                     | D.9.1.3 Surface Water Quality       | D.9-10        | Table D.9-7 Approved 2010 CWA Section 303(d) List of Water | Please specify which segment of Cottonwood Creek that is on the Section 303(d) list for Sediment Toxicity and DDT. Impairment applies to the San Marcos Creek Watershed segment.  |   |   |
| 190.                                     | D.9.1.3 Surface Water Quality       | D.9-10        | Table D.9-7 Approved 2010 CWA Section 303(d) List of Water | Section 303(d) listed pollutants for Buena Vista Creek were excluded. Buena Vista Creek is impaired for Sediment Toxicity (Toxicity) and Selenium (Metals/Metalloids).  |   |   |
| 191.                                     | D.9.1.3 Surface Water Quality       | D.9-10        | Table D.9-7 Approved 2010 CWA Section 303(d) List of Water | San Luis Rey River (West of I-15) is on the Section 303(d) list for Total Nitrogen as N (Nutrients). Please add.  |   |   |
| 192.                                     | D.9.1.3 Surface Water Quality       | D.9-10        | Table D.9-7 Approved 2010 CWA Section 303(d) List of Water | Loveland Reservoir is not on the Section 303(d) list for selenium. Please remove.   |   |   |

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|-----------|-------------------------------------|--------|----------------------|---|--|---|
|           |                                     |        |                      |   | Existing Language  | Revised Language  |
| 193.      | D.9.3.3 Direct and Indirect Impacts | D.9.34 | MM HYD-1             | <p>The SWPPP is a requirement of the Construction General Permit. As a result, much of the language included in this measure as currently written is unnecessary. The SWPPP also applies only to the Proposed Project's construction footprint.</p> <p>Providing notification of SWPPP amendments within 48 hours of submission to the RWQCB is impractical. Typically, a 72-hour BMP correction period is included in the SWPPP, and requiring notification of amendments before the correction period expires effectively reduces the opportunity to make corrections without an amendment. The resulting notifications would be significant and overly burdensome for SDG&amp;E and the agencies. SDG&amp;E recommends removing this 48-hour requirement and instead requiring notification of amendments as part of the weekly construction compliance reports. This would be consistent with current practice within the CNF and elsewhere. Since the SWPPP only applies during construction and a defined post-construction stabilization period, SDG&amp;E will submit weekly reports during these phases and stop when stabilization is complete.</p> <p>Due to the overall size of the Proposed Project and the anticipated five-year construction period, SDG&amp;E anticipates that multiple SWPPPs will be required, possibly for each constructed segment. As a result, this measure should clarify that the ECP will be updated for each construction segment before issuance of the NTP for that segment, and that submission of SWPPPs must be completed before NTP issuance for each construction segment. SDG&amp;E cannot complete all possible SWPPPs for the Proposed Project before the initial start of construction, particularly because local hydrology and topographical circumstances can vary over time.</p> | <p>For project components on federal land, SDG&amp;E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gulying on federal land. The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization); integrate requirements from the Construction General Permit, which likewise requires permittees to demonstrate implementation of post-construction cover requirements for final stabilization (i.e., re-vegetation); and integrate best management practices from the project's Stormwater Pollution Prevention Plan (see below). Additionally, the ECP shall compliment restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4. The ECP shall be provided to the California Public Utilities Commission (CPUC) for review prior to the Notice to Proceed issuance. The ECP shall be submitted to the Forest Service for review and approval prior to Notice to Proceed issuance.</p> <p>SDG&amp;E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project to reduce soil erosion during construction. The SWPPP and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance. SDG&amp;E shall provide CPUC and Forest Service with subsequent amendments to the SWPPP within 48 hours of the SWPPP amendment being submitted to the RWQCB; amendments shall be provided to the Forest Service to append to the ECP. In weekly construction compliance reports, SDG&amp;E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water Multiple Application and Report Tracking System (SMARTS) following storm events.</p> | <p>For project components on federal land, SDG&amp;E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gulying on federal land. The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization) <u>and incorporate Construction General Permit SWPPP requirements for each construction segment as the SWPPP(s) for that segment are completed.</u> <del>integrate requirements from the Construction General Permit, which likewise requires permittees to demonstrate implementation of post construction cover requirements for final stabilization (i.e., re-vegetation); and integrate best management practices from the project's Stormwater Pollution Prevention Plan (see below).</del> Additionally, the ECP shall <u>complement</u> restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4. The ECP shall be <u>updated for each construction segment and provided to the California Public Utilities Commission (CPUC) and USFS</u> for review prior to <del>the</del> <u>each agency's</u> Notice to Proceed issuance <u>for that construction segment. The ECP shall be submitted to the Forest Service for review and approval prior to Notice to Proceed issuance.</u></p> <p><u>As required by the Construction General Permit,</u> SDG&amp;E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project <u>or for individual construction segments, as required,</u> to reduce soil erosion during construction. The SWPPP(s) and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance <u>for the respective construction segment.</u> SDG&amp;E shall provide <u>the</u> CPUC and Forest Service with subsequent amendments to the SWPPP <u>as part of SDG&amp;E's weekly compliance reports within 48 hours of the SWPPP amendment being submitted to the RWQCB;</u> amendments shall be provided to the Forest Service to <u>append to the ECP.</u> In weekly construction compliance reports, SDG&amp;E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water</p> |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment # | Section Name                        | Page # | Paragraph or Table # | General Comment  | Specific Comment   |   |
|-----------|-------------------------------------|--------|----------------------|--|--|---|
|           |                                     |        |                      |  | Existing Language  | Revised Language  |
|           |                                     |        |                      |  |  | Multiple Application and Report Tracking System (SMARTS) following storm events.  |
| 194.      | D.9.3.3 Direct and Indirect Impacts | D.9-38 | MM HYD-2a            | Timing included in the text of MM HYD-2a on page D.9-38 of the document is inconsistent with the table on D.9-64. Please revise this text as provided. | The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC as a condition of receiving a permit to construct. | The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC <del>as a condition of receiving a permit to construct</del> prior to notice to proceed for each project component. |

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| 195.      | D.9.3.3 Direct and Indirect Impacts | D.9-43 | MM HYD-04            | <p>SDG&amp;E requests that a Qualified SWPPP Developer be included as part of the “qualified professional” list for this measure. Additionally, clarification is needed that this professional would be selected and contracted by SDG&amp;E with CPUC and USFS approval.</p> <p>This measure states that the qualified professional may recommend realigning the problematic road segment. This, however, would result in additional disturbance that could be considered creation of “new” access roads, which SDG&amp;E does not recommend. Finally, SDG&amp;E requests that, consistent with its other comments, this measure be clarified to allow for the planned multi-year construction schedule. Please revise this measure as provided.</p> | <p>Planned grading and repair activities along SDG&amp;E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within resource conservation areas (RCAs), or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, or CEG reviewed and approved by the CPUC and the Forest Service) and identify areas experiencing chronic erosion and drainage issues. The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues. The designed solution(s) shall be included into the approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments.</p> <p>...</p> <p>The Access Road Condition Evaluation and Repair Design Report shall identify locations, if any, where no feasible and/or effective solutions can be implemented to adequately handle runoff or comply with Forest Service soil and water quality management standards as contained in Forest Service Handbook 2509.22 (Section 12.2).</p> <p>In these locations, the qualified professional shall recommend options in the report that would minimize project-related and future runoff issues, such as eliminating use of the road for the purposes of the project (i.e., requiring access by helicopter), or re-aligning the problematic segment of road and decommissioning/restoring this segment in accordance with MM HYD-3 (decommissioning). Should CPUC and Forest Service agree that the latter recommendation (or both recommendations together) is most appropriate, CPUC and Forest service may request that the qualified professional design an engineered solution(s) for the road segment re-alignment (designed in accordance with the aforementioned Forest Service standards). The re-alignment would be included into the final report and into the project design.</p> <p>Construction of the power line replacement projects</p> | <p>Planned grading and repair activities along SDG&amp;E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within resource conservation areas (RCAs), or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, <u>QSD</u>, or CEG <u>contracted by SDG&amp;E and reviewed and approved by the CPUC and the Forest Service</u>) <u>prior to initiating construction on the associated segment, who will</u> <del>and</del> identify areas experiencing chronic erosion and drainage issues. The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues <u>prior to beginning work on those facilities associated with the problematic access road</u>. The designed solution(s) shall be included into the approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments.</p> <p>...</p> <p>The Access Road Condition Evaluation and Repair Design Report shall identify locations, if any, where no feasible and/or effective solutions can be implemented to adequately handle runoff or comply with Forest Service soil and water quality management standards as contained in Forest Service Handbook 2509.22 (Section 12.2). <u>The report will be updated for each construction segment according to SDG&amp;E’s final construction schedule.</u></p> <p>In these locations, the qualified professional shall recommend options in the report that would minimize project-related and future runoff issues, such as eliminating use of the road for the purposes of the project (i.e., requiring access by helicopter), or re-aligning the problematic segment of road and decommissioning/restoring this segment in accordance with MM HYD-3 (decommissioning). Should <u>the</u> CPUC and Forest Service agree that the latter recommendation (or both recommendations together) is most appropriate, <u>the</u> CPUC and Forest service may request that the qualified professional design an engineered solution(s) for the road segment re-</p> |

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|           |                                     |        |                      |  | shall not proceed until the report has been reviewed and approved by the Forest Service with concurrence from the CPUC. In the event there are disputes regarding specific problem locations, CPUC and Forest Service may elect to proceed with the projects; however, SDG&E shall not work in areas under dispute until resolution is achieved. | alignment (designed in accordance with the aforementioned Forest Service standards). The re-alignment would be included into the final report and into the project design.<br>Construction of <del>the power line replacement projects</del> <u>each segment</u> shall not proceed until the report <u>section pertaining to that segment</u> has been reviewed and approved by the Forest Service with concurrence from the CPUC. In the event there are disputes regarding specific problem locations, <u>the</u> CPUC and Forest Service <del>may elect to</del> <u>will allow construction to proceed with the projects on those portions of the construction segment not impacted by access roads requiring evaluation under this measure;</u> however, SDG&E shall not work in areas under dispute until resolution is achieved. |
| 196.      | D.9.3.3 Direct and Indirect Impacts | D.9-43 | MM HYD-06            | MM HYD-6 should be removed in its entirety. Separate pesticide and herbicide application requirements for project areas near Cottonwood Creek (C440, C449, and TL629C) would be inefficient. Cottonwood Creek is on the Section 303(d) list for DDT. The use of DDT was banned in 1972. Although it is no longer used or produced in the United States, DDT is still found in the environment because it does not chemically degrade easily. Applying MM HYD-5 requirements to Cottonwood Creek is sufficient to mitigate pesticide impacts and would not contribute to the violation of water quality objectives. | MM HYD-6 Pesticide Use Prohibition along Cottonwood Creek (C440, C449, and TL629C). SDG&E shall not use pesticides in routine O&M activities on poles located within the RCAs associated with Cottonwood Creek. Instead SDG&E must achieve pest management goals using non-chemical methods.   | <del>MM HYD-6 Pesticide Use Prohibition along Cottonwood Creek (C440, C449, and TL629C). SDG&amp;E shall not use pesticides in routine O&amp;M activities on poles located within the RCAs associated with Cottonwood Creek. Instead SDG&amp;E must achieve pest management goals using non-chemical methods.</del>  |
| 197.      | D.9.3.3 Direct and Indirect Impacts | D.9-51 | MM HYD-07            | The word “not” should be removed from this sentence as provided.   | Trench cut material will not be placed outside of the creek bed and outside of 100-year inundated areas.   | Trench cut material will <del>not</del> be placed outside of the creek bed and outside of 100-year inundated areas.  |
| 198.      | D.9.3.3 Direct and Indirect Impacts | D.9-51 | MM HYD-07            | Please revise as provided.   | Trench fill will be compacted and replaced to existing conditions, including matching existing creek bed gradations, and restoring vegetation.   | Trench fill will be compacted and replaced to <u>match existing conditions, including matching</u> existing bed gradations, and vegetation will be restored <del>restoring</del> <u>vegetation.</u>  |
| 199.      | D.9.3.3 Direct and Indirect Impacts | D.9-51 | MM HYD-07            | Requiring jack-and-bore or HDD for all creek crossings that cannot be completed during the dry season is unduly burdensome. Open cutting should be allowed if the creeks are dry, or no sensitive fish species are present. Additionally, these restrictions should more appropriately be included as water quality permit requirements, not as part of a mitigation measure in this document.   |  |  |
| 200.      | D.9.3.3 Direct and Indirect Impacts | D.9-51 | MM HYD-07            | Please revise as provided.   | (4) Immediately following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall  | (4) Within 24 hours <del>immediately</del> following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment  |

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|           |  |        |   |   | Existing Language   | Revised Language   |
|           |  |        |   |   | be left in place until restoration is deemed successful.  | barriers shall be left in place until restoration is deemed successful.  |
| 201.      | D.9.3.3 Direct and Indirect Impacts                    | D.9-52 | MM HYD-08   | Frac-out does not occur from jack-and-bore activities, so this measure should be limited to HDD only.                               |   |  |
| 202.      | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-64 | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality | Timing included in the text of MM HYD-2a on page D.9-38 of the document is inconsistent with the table on D.9-64.                   | The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC as a condition of receiving a permit to construct.  | The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC <del>as a condition of receiving a permit to construct</del> prior to notice to proceed for each project component.  |
| 203.      | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-65 | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality | Compliance Documentation and Consultation language of MM HYD-2b is duplicative. Please delete a. as provided.                       | a. Submittal of groundwater study (County of San Diego groundwater thresholds must not be exceeded)<br>b. Copy of water study with verified groundwater quantities and will serve letters providing verification that water adds up to equal estimated project construction needs<br>c. Provide monthly water logs documenting compliance with the water supply plan and groundwater thresholds | <del>a. Submittal of groundwater study (County of San Diego groundwater thresholds must not be exceeded)</del><br>b. Copy of water study with verified groundwater quantities and will serve letters providing verification that water adds up to equal estimated project construction needs<br>c. Provide monthly water logs documenting compliance with the water supply plan and groundwater thresholds |
| 204.      | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-65 | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality | The timing of MM HYD-2b should match the timing of MM HYD-2a.   |   |  |
| 205.      | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-67 | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality | MM HYD-5 Procedural Requirements for Pesticide and Herbicide Application should only apply to operation and maintenance activities. | a. At least 2 weeks prior to first pesticide application<br>b. During construction, operation, and maintenance<br>c. Submit on annual basis (or more frequently as needed)  | a. At least 2 weeks prior to first pesticide application<br>b. <del>During construction, operation, and maintenance</del> Post-construction during routine operation and maintenance<br>c. Submit on annual basis (or more frequently as needed)   |
| 206.      | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-69 | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology                   | The timing of MM HYD-7 should be changed to apply to creek crossing activities  | a. During construction<br>b. At least 60 days prior to construction<br>c. Prior to and during construction<br>d. During construction  | a. During <u>creek-crossing construction activities</u><br>b. At least 60 days prior to construction<br>c. Prior to and during construction<br>d. During construction  |

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|                                     |  |         | and Water Quality   |   |  |   |
| 207.                                | D.9.9 Mitigation Monitoring, Compliance, and Reporting | D.9-69  | Table D.9-11 Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality | The timing of MM HYD-8 should be changed to apply to creek crossing activities  | a. Prior to construction<br>b. Prior to and during construction, if applicable<br>c. During construction   | a. Prior to <u>creek-crossing construction activities</u><br>b. Prior to and during construction, if applicable<br>c. During construction   |
| <b>D.10 – Land Use and Planning</b> |  |         |   |   |  |   |
| 208.                                | D.10.3.3 Direct and Indirect Effects                   | D.10-47 | Fifth paragraph   | Construction activities will cause temporary access delays, not blockages. Please change “potential access blockage” to “potential access delays.”  | “For purposes of this analysis, it is assumed that construction activities occurring within 1,000 feet of a sensitive land use could result in potentially significant impacts associated with land use conflicts, potential access blockage, and indirect effects including the generation of dust and noise.”  | “For purposes of this analysis, it is assumed that construction activities occurring within 1,000 feet of a sensitive land use could result in potentially significant impacts associated with land use conflicts, potential access <del>blockage delays</del> , and indirect effects including the generation of dust and noise.”  |
| 209.                                | D.10.3.3 Direct and Indirect Effects                   | D.10-47 | Fifth paragraph   | Please include the rationale for using a 1,000-foot threshold when identifying sensitive land uses.   |  |   |
| 210.                                | D.10.3.3 Direct and Indirect Effects                   | D.10-47 | Table D.10-8 Sensitive Land Uses within 1,000 Feet of Project Components                    | The table includes the Amago Sports Park as a sensitive land use within 1,000 feet of TL682. Amago Sports Park is an off-road motorcycle racing facility and should not be considered a sensitive land use for this analysis. |  |   |
| 211.                                | D.10.3.3 Direct and Indirect Effects                   | D.10-47 | Table D.10-8 Sensitive Land Uses within 1,000 Feet of Project Components                    | For TL682, please remove the last sentence referencing helicopter activity, since helicopter activity is not discussed for any of the other power lines.  | “Construction activities including the use of helicopters would temporarily disturb these sensitive land uses.”  | “ <del>Construction activities including the use of helicopters would temporarily disturb these sensitive land uses.</del> ”  |
| 212.                                | D.10.3.3 Direct and Indirect Effects                   | D.10-49 | Table D.10-8 Sensitive Land Uses within 1,000 Feet of Project Components (footnote)         | Construction activities will cause temporary access delays, not blockages. Please change “potential access blockage” to “potential access delays.”  | “Note:<br><sup>1</sup> The 1,000-foot distance referenced in this table is used to identify sensitive land uses that may be potentially impacted by land use conflicts, potential access blockage, and indirect effects including the generation of dust and noise during construction activities. Please see Section D.13, Recreation, for specific distances between project components and identified recreation facilities.” | “Note:<br><sup>1</sup> The 1,000-foot distance referenced in this table is used to identify sensitive land uses that may be potentially impacted by land use conflicts, potential access <del>blockage delays</del> , and indirect effects including the generation of dust and noise during construction activities. Please see Section D.13, Recreation, for specific distances between project components and identified recreation facilities.” |
| 213.                                | D.10.3.3 Direct and Indirect                           | D.10-49 | MM LU-1   | The level of detail required in the Construction Notification Plan may not be available or known for the entire Proposed  |  |   |

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|                     |   |         |                      |   | Existing Language   | Revised Language  |
|                     | Effects   |         |                      | Project within the timeframe of when the plan is due (45 days before construction). Because the Proposed Project will be constructed over a period of several years, SDG&E proposes that this plan instead be required 45 days before construction of the first segment, and that the plan will be updated with additional information by construction segment according to the same timeline (45 days before construction on each additional segment.) |   |   |
| 214.                | D.10.9 Mitigation Monitoring, Compliance, and Reporting Program | D.10-71 | MM LU-1              | SDG&E can create a Construction Notification Plan 45 days before construction; however, the last sentence in the opening paragraph should state: "The plan shall address at a minimum <u>two of</u> the following components." This is consistent with SDG&E's notification requirements on other projects.   | "The plan shall address at a minimum the following components:"   | "The plan shall address at a minimum <u>two of</u> the following components:"   |
| 215.                | D.10.9 Mitigation Monitoring, Compliance, and Reporting Program | D.10-50 | MM LU-1              | Delays of 7 days or more are common for construction due to the high variability of factors involved in project scheduling, such as weather and fire conditions. Renoticing on this timeframe is not feasible. A timeframe of 30 days for renoticing is more appropriate.   | If construction delays of more than 7 days occur, an additional notice shall be prepared and distributed.   | If construction delays of more than <del>7-30</del> days occur, an additional notice shall be prepared and distributed.   |
| 216.                | D.10.3.3 Direct and Indirect Effects                            | D.10-50 | MM LU-1              | Please make the requirement for the Public Notice Mailer and Newspaper Advertisements consistent. While the requirement for Newspaper Advertisements includes "of any project component," the requirement for the Public Notice Mailer does not.  |   |   |
| 217.                | D.10.9 Mitigation Monitoring, Compliance, and Reporting Program | D.10-50 | MM LU-1              | "Post office" should be removed from the list of public venues for notices in MM LU-1 because posting notices at post offices is not permitted.   | "Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, post offices, rest stops, community centers, trailheads, informational kiosks, and other public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose and schedule of construction activities." | "Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, <del>post offices</del> , rest stops, community centers, trailheads, informational kiosks, and other public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose and schedule of construction activities." |
| 218.                | D.10.9 Mitigation Monitoring, Compliance, and Reporting Program | D.10-58 | MM LU-3              | Easement negotiations take into account the location of Proposed Project facilities; therefore, the 30-day notification requirement should not be required.   | The notified parties shall be provided at least 30 days in which to identify conflicts with any planned development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner.  | <del>The notified parties shall be provided at least 30 days in which to identify conflicts with any planned development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner.</del>   |
| <b>D.11 – Noise</b> |   |         |                      |   |   |   |
| 219.                | D.11.3.3 Direct and Indirect Effects                            | D.11-20 | MM NOI-4             | MM NOI-4 conflicts with APM-VIS-05. Please add language to MM NOI-4 that would allow for superseding APM VIS-05 when nighttime work is deemed necessary due to safety or  | For any work that cannot occur during the allowable construction hours (between 7 a.m. and 7 p.m. Monday through Saturday), SDG&E will follow its   | For any work that cannot occur during the allowable construction hours (between 7 a.m. and 7 p.m. Monday through Saturday), SDG&E <u>will be exempted from the</u>  |

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|   |   |         |   |  | Existing Language  | Revised Language  |
|   |   |         |   | other overriding factors.  | established protocols and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction. SDG&E will also communicate the exception to the CPUC and San Diego County in advance of conducting the work. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.                             | requirements outlined in APM VIS-05, will follow its established protocols, and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction. SDG&E will also communicate the exception to the CPUC and San Diego County in advance of conducting the work. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.  |
| <b>D.12 – Public Services and Utilities</b> |   |         |   |  |  |   |
| 220.  | D.12.3.3 Direct and Indirect Effects                    | D.12-11 | Last paragraph  | Please revise this sentence as provided.   | Conductors, hardware, and insulators associated with removed facilities would be recycled an approved facility, such as the SDG&E Mountain Empire Construction and Operations yard in Pine Valley, or recycled at a metal recycling facility.  | Conductors, hardware, and insulators associated with removed facilities would be recycled an approved facility, such as the SDG&E Mountain Empire Construction and Operations yard in Pine Valley, or recycled at a metal recycling facility.   |
| 221.  | D.12.6.1 Partial Removal of Overland Access Roads       | D.12-17 | Last paragraph (under Environmental Effects)  | Please revise this sentence as provided.   | As such, impacts to fire services, municipal water services, telecommunications, solid waste facilities, and disruption to electric service disruptions would essentially be the same as SDG&E's proposed project.   | As such, impacts to fire services, municipal water services, telecommunications, solid waste facilities, and disruption to electric service disruptions would essentially be the same as SDG&E's proposed project.  |
| 222.  | D.12.9 Mitigation Monitoring, Compliance, and Reporting | D.12-20 | Table D.12.3 Mitigation Monitoring, Compliance, and Reporting - Public Services and Utilities | AT&T facilities within the CNF boundary are under the jurisdiction of the USFS, who is responsible for issuing permits to construct, operate, and maintain telecommunication lines similar to the permits provided to SDG&E for its electric lines. The Proposed Project seeks to obtain an MSUP from the USFS as well as a PTC from the CPUC to construct, operate, and maintain electric lines. The Proposed Project does not involve, nor does SDG&E have the regulatory authority to require or authorize, the construction, operation, or maintenance of AT&T facilities. It is the responsibility of the USFS, through its regulatory authority over AT&T's facilities within the CNF boundary, to determine how AT&T's facilities are constructed, operated, and maintained. SDG&E's permitting process should not depend on the actions of another utility over which SDG&E has no authority. Further, SDG&E's Proposed Project should not be delayed or otherwise affected by separate negotiations between the USFS and AT&T. For Proposed Project facilities located outside of the CNF boundary, the CPUC is responsible for regulating telecommunications facilities consistent with the Public | <b>AT&amp;T Commitments.</b> Prior to receiving a Notice to Proceed with construction along each of the proposed power line replacement projects, SDG&E shall provide to the CPUC and Forest Service written commitment from AT&T confirming that AT&T facilities that are co-located on the proposed power line replacement projects will be relocated to SDG&E's new facilities. Facilities will be transferred in a manner that avoids interruptions of telecommunications services to the greatest degree possible. The timing of the relocation activities will be reviewed and approved by both the CPUC and Forest Service. | <b>AT&amp;T Commitments.</b> Prior to receiving a Notice to Proceed with construction along each of the proposed power line replacement projects, SDG&E shall will solicit a provide to the CPUC and Forest Service written commitment from AT&T confirming that AT&T facilities that are co-located on the proposed power line replacement projects will be relocated to SDG&E's new facilities. <u>Because SDG&amp;E does not have the regulatory authority to require such a commitment, however, the USFS will obtain the necessary commitment through its special use permit process for facilities located within the CNF boundary, and the CPUC will obtain the necessary commitment for facilities located outside the CNF boundary. Acquisition of these commitments by the USFS and CPUC will not delay SDG&amp;E's construction of the Proposed Project. SDG&amp;E's final project design will include the necessary structural capabilities to accommodate AT&amp;T's existing telecommunications facilities via SDG&amp;E's overhead structures or underground conduits constructed as part of the Proposed Project, depending on the final project design</u> |

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|                          |                                      |         |  |   | Existing Language  | Revised Language  |
|                          |                                      |         |  | Utilities Code. Again, SDG&E has no authority over AT&T or any other telecommunications utility regarding the construction, operation, and maintenance of their facilities. As such, SDG&E's Proposed Project should not be contingent upon a requirement over which SDG&E has no control. Please revise this measure as provided.  |  | approved by the CPUC and USFS. Facilities will be transferred in a manner that avoids interruptions of telecommunications services to the greatest degree possible. The timing of the relocation activities will be reviewed and approved by both the CPUC and Forest Service.  |
| <b>D.13 – Recreation</b> |                                      |         |  |   |  |   |
| 223.                     | D.13.1.2.1 Power Lines               | D.13-10 | Table D.13-3 Recreation Areas and Trails located near or traversed by TL625  | Please verify the distance and direction between TL625 and Pine Creek Wilderness. SDG&E believes TL625 is located approximately 1.7 miles west of the Pine Creek Wilderness Area, but this table indicates that TL625 is 0.6 miles east of the Pine Creek Wilderness.   |  |   |
| 224.                     | D.13.1.2.1 Power Lines               | D.13-16 | Table D.13-5 Recreation Areas and Trails located near or traversed by TL6923 | Please verify the distance and direction between TL6923 and Hauser Wilderness. SDG&E believes TL6923 is located approximately 0.1 mile south of Hauser Wilderness, but this table indicates that TL6923 is 0.25 mile south.   |  |   |
| 225.                     | D.13.1.2.2 Distribution Circuits     | D.13-19 | First paragraph  | The Draft EIR/EIS includes the following statement: "According to the California Department of Parks and Recreation, the Preliminary General Plan and Draft EIR will be released for public review in early 2014 (California Department of Parks and Recreation 2013c)." This document was released for public review on August 21, 2014.   |  |   |
| 226.                     | D.13.3.3 Direct and Indirect Effects | D.13-41 | First paragraph  | Please revise as provided.  | The entirety of undergrounding activities along the new alignment within Lookout Road would take several days to complete;   | The entirety of undergrounding activities along the new alignment within Lookout Road would take several <del>days</del> weeks to complete;   |
| 227.                     | D.13.3.3 Direct and Indirect Effects | D.13-45 | MM REC-1   | MM REC-1 should be required before completion of each construction segment. It is not feasible to identify all locations for all gates for the entire Proposed Project before completion of the first construction segment. If the USFS has identified specific locations where gates are needed, please provide this information to SDG&E. Additionally, MM REC-1 should be timed to occur only during or before completion of construction. SDG&E typically waits to install new gates until construction is complete to prevent potential safety or damage concerns during construction. Further, the cost of installing USFS-approved gates is substantially greater than typical SDG&E gates, but there is | <b>MM REC-1 Installation of Gates and Appropriate Signage.</b> To deter unauthorized access to specially designated or restricted areas via improved power line replacement project access roads, the project applicant shall install new Forest Service-approved gates (or other barriers, such as pipe rail, where appropriate) at the convergence of the improved access road and the primary roadway of access. In addition, appropriate deterrence signage approved by the Forest Service shall be installed on gates. Maintenance of gates and signage shall be the responsibility of the project applicant. | <b>MM REC-1 Installation of Gates and Appropriate Signage.</b> To deter unauthorized access to specially designated or restricted areas via improved power line replacement project access roads, the project applicant shall install new <del>Forest Service-approved gates (or other barriers, such as pipe rail, where appropriate)</del> <u>gates or other barriers, to be agreed upon between the Forest Service and SDG&amp;E, at the convergence of the improved access roads and the connecting primary public roadway of access prior to completing construction on the segment served by these roads.</u> In addition, appropriate deterrence signage approved by |

| Comment #                                | Section Name                         | Page #  | Paragraph or Table #                      | General Comment  | Specific Comment   |  |
|--|--------------------------------------|---------|---|--|--|--|
|  |                                      |         |   |  | Existing Language  | Revised Language   |
|  |                                      |         |   | no data that the USFS-approved gates improve performance or deterrence of unauthorized access. SDG&E recommends that the type of gate be determined based on further discussions with the USFS, to be completed before completion of construction for the first construction segment. SDG&E will not take ownership of gates installed within the CNF or maintain the requested gates and signage unless the USFS guarantees that the roadways enclosed by these gates and signage provide access only to SDG&E facilities and that SDG&E will be the only authorized user of these roads. Gates on access roads used by other authorized users may be damaged by those users. Requiring SDG&E to be solely responsible for damages to these gates is unreasonable. SDG&E recommends that the USFS consider a gating component of the O&M Plan to identify, delineate, and implement appropriate procedures and quantifiable goals and benchmarks for evaluating the success of gating and signage implementation. |  | the Forest Service shall be installed on gates. Maintenance of gates and signage shall be the responsibility of the project applicant <u>for access roads guaranteed by the Forest Service 1) to lead only to Proposed Project facilities and 2) for which SDG&amp;E is the only authorized user permitted to have access. Gates and signage not meeting both of these criteria will be maintained by the Forest Service.</u>  |
| 228.                                     | D.13.3.3 Direct and Indirect Effects | D.13-46 | MM REC-2                                  | This measure lacks justification, such as a quantifiable methodology for determining increased disturbance due to an unlocked gate. Patrolling all gates to determine causality between an unlocked gate and additional disturbance is not realistic. As the USFS is aware, unauthorized access and use of existing roads occurs not only through approved entry points, but through cross-country access along the lengths of these roads. SDG&E cannot police the entirety of all access roads for unauthorized users and should not be held accountable for the actions of unauthorized users. Additionally, SDG&E cannot be responsible for the restoration of disturbance resulting from unauthorized users. SDG&E is not typically the only authorized user with gate access. Other authorized users may leave gates unlocked without SDG&E's knowledge. As a result, this measure is not effective and should be deleted in its entirety.   | <b>MM REC-2 Enforcement of Proper Gate Protocol.</b> During construction and ongoing operations and maintenance activities, gates shall be locked immediately after ingress and egress has occurred. Should SDG&E or Forest Service staff observe increased disturbance along the right-of-way resulting from unauthorized access due to unlocked gates, SDG&E will be required to restore these areas and review gate protocols with personnel. Alternatively, the Forest Service may require the project applicant to cost-recover restoration activities (i.e., trail maintenance and restoration) associated with the unauthorized access and damage to resources, should those restoration activities be carried out by the Forest Service. | <b>MM REC-2 Enforcement of Proper Gate Protocol.</b> <del>During construction and ongoing operations and maintenance activities, gates shall be locked immediately after ingress and egress has occurred. Should SDG&amp;E or Forest Service staff observe increased disturbance along the right-of-way resulting from unauthorized access due to unlocked gates, SDG&amp;E will be required to restore these areas and review gate protocols with personnel. Alternatively, the Forest Service may require the project applicant to cost-recover restoration activities (i.e., trail maintenance and restoration) associated with the</del> <u>unauthorized access and damage to resources, should those restoration activities be carried out by the Forest Service.</u> |
| <b>D.14 – Transportation and Traffic</b> |                                      |         |   |  |  |  |
| 229.                                     | D.14.1.1 General Overview            | D.14-2  | Seventh paragraph (under Roadway Network) | Depending on the Proposed Project's final design, other existing public roadways may be used for access during construction in addition to those provided in Table D.14-1: Public Access Roadways. During construction, SDG&E may use any existing public roadways required to access the Proposed Project's components. Please revise as provided.  | A list of the existing roadways that will be used for access during construction and those that are spanned by the power line replacement projects, as well as number of lanes and levels of service (LOS) (for roadways that have this data) is are provided in Tables D.14-1 and D.14-2 below.   | A list of existing roadways that <del>will</del> <u>may</u> be used for access during construction and those that are spanned by the power line replacement projects, as well as number of lanes and levels of service (LOS) (for roadways that have this data), <del>is are</del> provided in Tables D.14-1 and D.14-2 below.   |
| 230.                                     | D.14.4.1 TL626 Alternative           | D.14-30 | Second paragraph                          | This paragraph incorrectly refers to MM LU-5, which is not a mitigation measure in the document. SDG&E believes this measure should refer to MM LU-4.  | As construction, operations, and maintenance would proceed in a similar fashion as that described for SDG&E's proposed project in areas proposed to be   | As construction, operations, and maintenance would proceed in a similar fashion as that described for SDG&E's proposed project in areas proposed to be   |

| Comment #                            | Section Name   | Page #            | Paragraph or Table # | General Comment  | Specific Comment  |  |
|--------------------------------------|--|-------------------|----------------------|--|---|--|
|                                      |  |                   |                      |  | Existing Language   | Revised Language   |
|                                      | Routes   |                   |                      |  | undergrounded, it is anticipated that with implementation of APM TRANS-01 through APM TRANS-05 and MM LU-5, adverse and significant construction traffic Impacts TRANS-1 through TRANS-5 would be reduced through the development and implementation of a Traffic Control Plan and obtaining the required encroachment permit from the County of San Diego Department of Public Works; therefore, impacts would be mitigated under NEPA and less than significant with mitigation under CEQA (Class II).  | undergrounded, it is anticipated that with implementation of APM TRANS-01 through APM TRANS-05 and MM LU-5 <del>4</del> , adverse and significant construction traffic Impacts TRANS-1 through TRANS-5 would be reduced through the development and implementation of a Traffic Control Plan and obtaining the required encroachment permit from the County of San Diego Department of Public Works; therefore, impacts would be mitigated under NEPA and less than significant with mitigation under CEQA (Class II).   |
| 231.                                 | D.14.6.2 Removal of TL626 from Service                                 | D.14-34 and 35    |                      | This section only discusses airports for the Removal of TL626 from Service Alternative. Please remove references to airports in this section. The discussion of airports should remain in Section D.7 - Public Health and Safety.  |   |  |
| <b>D.15 – Electromagnetic Fields</b> |  |                   |                      |  |   |  |
| 232.                                 | D 15.4 Consideration of Electric and Magnetic Fields – Proposed Action | D.15-8 and onward |                      | The Proposed Project includes replacing wood poles with steel poles without changing the voltage and within generally the same alignment. Consistent with CPUC General Order 95, the replacement poles will be slightly taller, which will increase the distance between the conductors and the ground below. There is no reason to suggest that potential EMF effects could increase as a result of the Proposed Project or that additional study regarding the potential effects of EMF is required. All eligible potential effects and mitigation have already been considered. |   |  |
| 233.                                 | D 15.4 Consideration of Electric and Magnetic Fields – Proposed Action | D.15-9            | First paragraph      | Please revise this section as provided.  | Once energized, the replacement power lines would generate EMFs, as do the existing current power lines. SDG&E’s Detailed Field Management Plan (SDG&E 2012) for the subject project, prepared in compliance with CPUC General Order 131-D (CPUC 1995) and CPUC decisions 93-11-013 (CPUC 1993) and 06-01-042 (CPUC 2006a), provides the edge-of ROW magnetic field profiles which include design measures to reduce magnetic fields. Tables D.15-3 and D.15-4 show the initial design and recommended (“low-cost”) design magnetic field values (milligauss) and the percent change for increasing minimum sag height in residential zoned areas within SDG&E’s proposed project scope, and for phasing circuits to reduce magnetic fields. The magnetic field values were calculated at the edges-of-ROWs or edge-of-easement for all transmission lines. | Once energized, the replacement power lines would generate EMFs, as do the existing <del>current</del> power lines. SDG&E’s Detailed Field Management Plan (SDG&E 2012) for the subject project, prepared in compliance with CPUC General Order 131-D (CPUC 1995) and CPUC decisions 93-11-013 (CPUC 1993) and 06-01-042 (CPUC 2006a), provides <del>the</del> <u>calculated</u> edge-of-ROW magnetic field profiles which include design measures to reduce magnetic fields. Tables D.15-3 <del>and D.15-4</del> <u>shows the calculated changes in magnetic field values (in milligauss) resulting from increases in minimum sag height for single-circuit 69 kV power lines in the residential areas of the Proposed Project. Table D.15-4 shows the calculated milligauss values and anticipated reduction achieved by phasing circuits for the initial design and recommended (“low-cost”) design for double-circuit 69 kV power lines</u> magnetic field values (milligauss) and the percent change for increasing minimum sag height in residential zoned |

| Comment #                             | Section Name  | Page #             | Paragraph or Table #   | General Comment  | Specific Comment  |  |
|---------------------------------------|---|--------------------|--|--|---|--|
|                                       |   |                    |  |  | Existing Language   | Revised Language   |
|                                       |   |                    |  |  |   | areas within SDG&E's proposed project scope, and for phasing circuits to reduce magnetic fields. The magnetic field values were calculated at the edges-of-ROWs or edges-of-easement for all <del>transmission</del> Proposed Project power lines.   |
| 234.                                  | D 15.5 Summary Regarding EMF  | D.15-9 and D.15-10 | Last sentence on D.15-9 and first paragraph of D.15-10                             | Please revise this section as provided.  | After several decades of study regarding potential public health risks from exposure to power line EMF, research results remain inconclusive. Several national and international panels have conducted reviews of data from multiple studies and state that there is not sufficient evidence to conclude that EMF causes cancer or other adverse health effects. The information included in the preceding sections identifies existing EMF exposures within the community and provide specific information on the EMF levels estimated for SDG&E's proposed project. Presently, there are no applicable regulations related to EMF levels from power lines. However, the CPUC has implemented a decision requiring utilities to incorporate "low cost" or "no cost" measures for managing EMF from power lines. SDG&E's proposed project incorporates low cost and no cost measures as described in Section D.15.4 as mitigation for magnetic fields consistent with CPUC Decision D.93-11-013 (see SDG&E, 2012, "Appendix F: Detailed Magnetic Field Management Plan for the Cleveland National Forest (CNF) Power line Replacement Projects." October 11, 2012). | After several decades of study regarding potential public health risks from exposure to <del>power line</del> EMF, research results remain inconclusive. Several national and international panels have conducted reviews of data from multiple studies and state that there is not sufficient evidence to conclude that EMF causes cancer or other adverse health effects. The information included in the preceding sections identifies existing EMF exposures within the community and provide specific information on the EMF levels estimated for SDG&E's proposed project. <del>Presently, there are no</del> applicable regulations related to EMF levels from power lines. However, the CPUC has implemented a decision requiring utilities to incorporate "low cost" or "no cost" measures, <u>where applicable</u> , for managing EMF from power <u>and transmission</u> lines. SDG&E's proposed project incorporates low-cost and no-cost measures as described in Section D.15.4 as mitigation for magnetic fields consistent with CPUC Decisions D.93-11-013 <u>and D.06-01-042</u> (see SDG&E, 2012, "Appendix F: Detailed Magnetic Field Management Plan for the Cleveland National Forest (CNF) Power line Replacement Projects." October 11, 2012). |
| <b>E – Comparison of Alternatives</b> |   |                    |  |  |   |  |
| 235.                                  | E.2.3 Overall Ranking of the Federal Proposed Action, Including the No Action Alternative | E-6                |  | This section incorrectly states that the Proposed Project would have Class I impacts from PM <sub>10</sub> emissions; as shown in Table D.3-6, the Proposed Project would not exceed the threshold for this pollutant.   |   |  |
| 236.                                  | E.2.3 Overall Ranking of the Federal Proposed Action, Including the No Action             | E-7 through E-18   | Table E-1 Comparison of Impacts for SDG&E's Proposed Project with Federal Proposed | The impacts analyzed in this table need to be reevaluated based on the identified additional impacts that could result from the various alternatives as described in SDG&E's previous comments (e.g., additional air quality and biological and cultural resources impacts from undergrounding C440). Please update accordingly. |   |  |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment #   | Section Name  | Page #            | Paragraph or Table #  | General Comment   | Specific Comment  |   |
|---|---|-------------------|---|---|---|---|
|   |   |                   |   |   | Existing Language   | Revised Language  |
|   | Alternative   |                   | Actions   |   |   |   |
| 237.  | E.2.3 Overall Ranking of the Federal Proposed Action, Including the No Action Alternative   | E-27 through E-32 | Table E-2 Comparison of Impacts for SDG&E's Proposed Project with Additional Alternatives | The impacts analyzed in this table need to be reevaluated based on the identified additional impacts that could result from the various alternatives as described in SDG&E's previous comments (e.g., additional air quality and biological and cultural resources impacts from undergrounding C440). Please update accordingly.  |   |   |
| 238.  | E.3.3.2 Removal of TL626 from Service   | E-34              | Third paragraph   | The description of the development of the new three mile loop-in of TL625 incorrectly refers to TL629. Change to TL625.   | New construction to loop-in TL629 into the Suncrest Substation would occur primarily on National Forest Service lands within 100 feet of the existing 500 kV Sunrise Powerlink line, consistent with Cleveland National Forest (CNF) LMP direction to co-locate facilities, and would occur within suitable land use zones. | New construction to loop-in <del>TL629</del> <u>TL625</u> into the Suncrest Substation would occur primarily on National Forest Service lands within 100 feet of the existing 500 kV Sunrise Powerlink line, consistent with Cleveland National Forest (CNF) LMP direction to co-locate facilities, and would occur within suitable land use zones. |
| 239.  | E.5.1.2 TL626 Replacement Alternatives Proposed by SDG&E  | E-56 through E-62 | Tables E-6 and E-7  | The title of this section and tables incorrectly identifies these alternatives as proposed by SDG&E. SDG&E did not propose any alternatives to the Proposed Project. Rather, these alternatives were requested by the CPUC and USFS to be preliminarily evaluated for feasibility by SDG&E. Please revise all titles, text, tables, and accompanying figures accordingly. |   |   |
| <b>F – Cumulative Scenario and Impacts</b>                          |   |                   |   |   |   |   |
| 240.  | SDG&E has no comments on this section.  |                   |   |   |   |   |
| <b>G – Required CEQA/NEPA Topics</b>                                |   |                   |   |   |   |   |
| 241.  | SDG&E has no comments on this section.  |                   |   |   |   |   |
| <b>H – Mitigation Monitoring, Compliance, and Reporting Program</b> |   |                   |   |   |   |   |
| 242.  | SDG&E requests that all provided comments and revisions on all mitigation measures be incorporated throughout the text and associated tables in the Final EIR/EIS as well as incorporated completely in the Mitigation Monitoring, Compliance, and Reporting Program. |                   |   |   |   |   |
| <b>I – Public Participation</b>                                     |   |                   |   |   |   |   |
| 243.  | SDG&E has no comments on this section.  |                   |   |   |   |   |
| <b>J – Distribution of Draft EIR/EIS</b>                            |   |                   |   |   |   |   |
| 244.  | SDG&E has no comments on this section.  |                   |   |   |   |   |
| <b>K – Report Preparation</b>                                       |   |                   |   |   |   |   |
| 245.  | K-1 List of Preparers   | K-1               | Table K-1 List of Preparers   | Please revise the entry for Michal Huff as provided.  | Fuels and Fuels Management  | <del>Fuels</del> <u>Fire</u> and Fuels Management   |

Cleveland National Forest Power Line Replacement Projects  
 Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)  
 San Diego Gas & Electric Company (SDG&E) Comments



| Comment #        | Section Name                           | Page # | Paragraph or Table # | General Comment | Specific Comment  |                  |
|------------------|--|--------|----------------------|-----------------|-------------------|------------------|
|                  |  |        |                      |                 | Existing Language | Revised Language |
| <b>L – Index</b> |  |        |                      |                 |                   |                  |
| 246.             | SDG&E has no comments on this section. |        |                      |                 |                   |                  |

**Table D.4-10**  
**Potential Project Impacts to USACE Jurisdictional Waters and Wetlands**

| Project Components (North to South) | Potential Impacts to Jurisdictional Waters (Acres) <sup>1</sup> |                 | Potential Impacts to Jurisdictional Wetlands (Acres) <sup>1</sup> |                 | Potential Total Impacts (Acres) <sup>1</sup> |                 |
|-------------------------------------|---|-----------------|---|-----------------|--|-----------------|
|                                     | Temporary   | Permanent       | Temporary   | Permanent       | Temporary                                    | Permanent       |
| TL682                               | 0.08  |                 | 0.25  | <0.01           | 0.33   | <0.01           |
| TL626                               | 0.01  | < 0.01          | 0.04  | <0.01           | 0.05   | <0.01           |
| TL625                               | 0.07  |                 | 1.41  | <0.01           | 1.48   | <0.01           |
| TL629                               | 0.03  | < 0.01          | 0.06  | <0.01           | 0.09   | <0.01           |
| TL6923                              | 0.01  | < 0.01          |   |                 | 0.01   | <0.01           |
| C79                                 |   |                 |   |                 |  |                 |
| C78                                 | <0.01   |                 |   |                 | <0.01  |                 |
| C157                                |   |                 |   |                 |  |                 |
| C442                                | <0.01   |                 |   |                 | <0.01  |                 |
| C440                                | <0.01   | < 0.01          |   |                 | <0.01  | <0.01           |
| C449                                | <0.01   |                 |   |                 | <0.01  |                 |
| <b>Sub-totals</b>                   | <b>0.20</b>   | <b>&lt;0.01</b> | <b>1.76</b>   | <b>&lt;0.01</b> | <b>1.96</b>                                  | <b>&lt;0.01</b> |
| <b>Totals</b>                       | <b>0.20</b>   |                 | <b>1.76</b>   |                 | <b>1.96</b>                                  |                 |

<sup>1</sup> – Estimates of potential project impacts to waters of the U.S (including wetlands) is based on preliminary jurisdictional delineation data collected to date (SDG&E 2013). Impacts to waters of the state under the combined jurisdiction of RWQCB and CDFW and riparian habitats under the jurisdiction of CDFW only will be determined in late 2014 upon completion of the preliminary jurisdictional delineation.





**681 TAKE, POSSESS OR DESTROY ANY BIRD NESTS OR EGGS; OR TAKE BIRDS IN THE ORDERS FALCONIFORMES, STRIGIFORMES OR ACCIPITRIFORMES:**

681.1 Purpose and Scope of Regulations

This article implements §§ 3503 and 3503.5 of the Fish and Game Code and § 21083 of the Public Resources Code. This article does not affect the Department's authority pursuant to any other provision of the Fish and Game Code, including but not limited to §§ 2080, 3511 and 3513.

681.2 Definitions

- (a) *Bird of prey.* Any bird within the orders Falconiformes, Strigiformes or Accipitriformes.
- (b) *Destroy.* Any action that physically modifies a nest from its previous condition and adversely affects the survival of a bird-of-prey or its eggs.
- (c) *Feasible.* Feasible shall have the same meaning specified at 14 CCR §15364.
- (d) *Needlessly Destroy.* Any action that physically modifies a nest from its previous condition and adversely affects the survival of eggs when it is feasible to avoid such effect until eggs or juvenile birds no longer require the nest for survival.
- (e) *Nest.* A site, or a structure built, maintained or used by a native bird, that is occupied by eggs or nestlings or is otherwise essential to the survival of a juvenile bird.
- (f) *Possess.* To collect any nest or egg, or physically remove or relocate a nest or egg from a site where it is found or to maintain physical control of a bird of prey for any period of time.
- (g) *Site.* The specific spatial location that a bird selects for egg laying purposes.
- (h) *Take.* Shall have the same meaning specified at Fish and Game Code §86. Take does not apply to nests.

681.3 Exceptions

- (a) Actions meeting the criteria for take, possess, needlessly destroy or destroy are not prohibited when authorized by the U.S. Fish and Wildlife Service under terms of the Migratory Bird Treaty Act.
- (b) Actions to prevent or mitigate an emergency as defined in Public Resources Code section 21060.3.

681.4 California Environmental Quality Act Thresholds of Significance.

Where acting as a State Lead or Responsible agency, the Department will conform with § 21166 of the Public Resources Code, CEQA Guidelines (14 CCR) § 15096, and rely on the following thresholds of significance for impacts related to take, possession, needless destruction or destruction of native bird nests, eggs or birds of prey. A significant impact on avian biological resources will occur if:

- (a) The project has a substantially adverse effect, either directly or through habitat modifications, on any population of a bird species identified as a candidate, threatened or endangered species by the Fish and Game Commission or a species of special concern by the Department of Fish and Wildlife.
- (b) The project has the potential to substantially reduce the habitat, restrict the range or cause a population of a bird species to drop below self-sustaining levels.
- (c) The project is likely to have long-term adverse consequences for one or more populations of native bird species, or
- (d) The project has direct or indirect environmental effects on bird species that are individually limited but cumulatively considerable.

Draft 07172014

Note: Authority cited: Sections 3503 and 3503.5 Fish and Game Code and Section 21083 Public Resources Code;  
Reference: Sections 713, 1600 et seq, 2000, 3511 Fish and Game Code; and Sections 4629.6(c) and 21000 et  
seq., Public Resources Code.

# **F – INDIVIDUALS**



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**From:** Cindy Buxton <iokuok2@hotmail.com>  
**Sent:** Saturday, September 06, 2014 7:49 AM  
**To:** CNFMSUP; Will Metz; Joan Friedlander; Bjorn Fredrickson; jaheys@fs.fed.us  
**Subject:** SDGE Master Permit -- DEIR/DEIS comments

this is way too vague, Nate found reference to removing the 626 but all I can find is an above ground route followed by undergrounding through Inaja. Which is it?

Two hours of public access to foresters for 100 miles of this is not nearly enough. There is a discussion of user suggested alternates west of the corridor. This is a classic example of a myriad of misunderstandings that get started when we do not have sufficient access to a dialogue with you guys. IN the long run it is far more expensive and time consuming. I spent a long time on that for some reasons that apparently did not filter through. The content is moot.

I would like some way to navigate through this. I spent about six hours and I still cannot find where this is suggesting the removal of 626 as a preferred option though Nate says its there.

Assuming that Nate has this figured out then you must do the following (except for "CNFMSUP"):  
place your right palm on the back of your left shoulder and at the same time place your left hand on the back of your right shoulder. pull.

There you've been faxed a hug. I've got lots to argue about but this is still a miracle!.

Thanks for it all. more much more to come.

Cindy Buxton

*1964 Civil Rights 50 ~ Wilderness 50 ~ Beatles 50 Yea yea yea!*

*Stress is temporary; Quitting lasts forever. We can't become what we want to be by remaining what we are.*

.....  
.....

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**From:** [CNFMSUP@dudek.com](mailto:CNFMSUP@dudek.com)  
**To:** [CNFMSUP@dudek.com](mailto:CNFMSUP@dudek.com)  
**Subject:** Public Notice - Notice of Availability and Public Meeting for SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects Draft EIR/EIS  
**Date:** Fri, 5 Sep 2014 14:23:21 +0000

The California Public Utilities Commission (CPUC) and United States Department of the Agriculture, Forest Service, Cleveland National Forest (Forest Service) have prepared a Joint Draft Environmental Impact Report/Draft Environmental Impact Statement

(DEIR/DEIS) under the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) for consideration of San Diego Gas & Electric Company's (SDG&E's) proposed issuance of a Master Special Use Permit (MSUP) for the SDG&E system in the Cleveland National Forest (CNF), and proposed replacement/fire hardening of select power lines in and around the CNF.

Provided attached is the public notice for the availability of the DEIR/DEIS and of the public meeting scheduled for October 1, 2014. Project details and information on availability of the DEIR/DEIS and upcoming public informational meeting are provided in the attached public notice. The DEIR/DEIS is available for review on the CPUC website at:  
<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

You are receiving this notice containing information about the project in accordance with CEQA.  
Please confirm receipt of this email.

OCT 06 2014

## GARY C HOYT

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2052 Flying Cloud Pl  
Boulevard, Ca. 91905

October 3, 2014

**LISA ORSAHA/CPUC**

c/o Dudek  
605 Third Street  
Encinitas, Ca. 92024

Dear Ms. Orsaha,

I attended the DEIR/DEIS meeting in Alpine, Ca, last Weds., Oct. 1 and would like to make a short public comment that hopefully will be mandated and returned to SDG&E.

I live and own 40 acres of land currently adjoining the 69KV line that terminates at the Boulevard substation, approx 1/2 mile from my property.

Two concerns:

1. The *existing 30' easement* the current 69KV line (TL 69??) spans **is wide enough** for the distribution lines to the Boulevard substation and has been for decades. DO NOT allow SDG&E to take any more land from the property owners! It has been stated an additional 100' will be taken for the TL 69?? (11?) SDG&E will be replacing wooden poles with higher steel poles. SDG&E DO NOT need the additional space for the new fire hardening steel poles! **They are simply replacing a pole for a pole**, 30' is plenty. If I'm not mistaken a highway lane is 14' in width in comparison.
2. **Undergrounding:** 120' in height steel poles are not pretty sites by themselves, with accompanying cables spanning between the steel poles even worse plus the possibility of more overhead cables in the future. (SDG&E)

### **Summary:**

1. Mandate SDG&E **no wider easements** than existing on TL69?? (TL6911?) into the Boulevard substation. The TL is currently 69KV and is supposed to remain the same.
2. Mandate **undergrounding** (not as an option) of wire/cable within 3 miles of the substation in Boulevard.

In closing, please excuse the outbursts of some locals at the Alpine meeting. I have sat on a planning group in the past and know how disturbing it can be.

But in the defense of the vocal audience members at the Alpine meeting, many have grown to be very untrustful of SDG&E during/after the Sunrise Powerlink construction, which effected many of us in a negative way both financially and aesthetically.

Lets make the "fire hardening" renewal a PLUS for the residents of Ca. not "the most cost effective, old school way" of electrical construction. **Lets progress and not digress.**

If I can be of further assistance please direct your concerns to the address on page 1.

Sincerely,

  
Gary Hoyt/Boulevard

OCT 06 2014

2014 OCT 6 TO: LISA ORBATA, DUDECK, CALIFORNIA PUBLIC UTILITIES COMMISSION,  
UNITED STATES DEPARTMENT OF AGRICULTURE, FOREST SERVICE CLEVELAND NATIONAL FOREST

FROM: WILLIAM AND SHANNON DAVIS

RE: EIR/EIS MASTER SPECIAL USE PERMIT AND PERMIT TO CONSTRUCT POWER LINE REPLACEMENT  
PROJECTS

DEAR SIRs,

WE ARE RESUBMITTING SOME OF OUR UNANSWERED QUESTIONS OF 2014 MAR 6.

FOR CIRCUIT 440 ( AND TL625D), WHICH MANUFACTURER, WHICH POWER LINE PART NUMBERS ( OR  
NAMES LIKE 636 ACSS/AW, ROOK, CANARY, ETC.) WILL BE INSTALLED ON THE 69KV POLES AND THE  
12KV POLES ( WAS 15KV) ?

ON THOSE POWER LINE PART NUMBERS WHAT IS THEIR MAXIMUM VOLTAGE CAPABILITY ?

HOW MANY POWER LINES WILL BE ON THE 69KV POLES AND ON THE 12KV POLES ( WAS 15KV) ?

CAN MORE POWER LINES BE ADDED IN THE FUTURE ?

CAN HIGHER CAPACITY LINES BE ADDED OR REPLACED IN THE FUTURE ?

CAN HIGHER CAPACITY LINES BE ADDED/REPLACED IN THE FUTURE ?

IS CIRCUIT 440 TO BE USED FOR MORE THAN DISTRIBUTION TO INTERNAL C.N.F. CUSTOMERS ?

IS THE CURRENT ELECTRIC VOLTAGE INPUT/OUTPUT TO THE C.N.F. MONITORED ?

WILL ELECTRIC VOLTAGE PASSING THROUGH THE C.N.F. BE TRANSFERRED TO THE 500KV LINE ?

WILL LESS ELECTRICITY BE NEEDED IF 100 SHRINER HOMES ARE NOT PERMITTED BACK IN THE C.N.F. ?

WILL THE FOUR FOOT ELECTRICAL EASEMENT BE EXPANDED NOW OR IN THE FUTURE IN OUR BACK  
YARD FOR EXISTING 12KV POLES : P40192 TO P40193 TO P40195 ?

----- END OF RESUBMITTED QUESTIONS -----

PAGE 1 OF 2 PAGES

WILL THE TL625D 69KV LINE RUNNING THROUGH PARCEL 602-020-08-00 HAVE THREE CONDUCTOR LINES OF 636 ACSS/AW "ROOK" WITH 23KV EACH ?

IF AN ELECTRICAL CONDUCTOR "ROOK" FOR A VOLTAGE OF 69KV HAS THE AMPERAGE INCREASED FOUR TIMES, LIKE FROM 270 AMPS TO 1,158 AMPS, APPROXIMATELY WHAT WOULD BE THE MAXIMUM MAGNITUDE OF CHANGE IN THE TRANSMISSION OF POWER TRANSFERRED IN WATTS ?

WHAT WOULD BE THE APPROXIMATE VOLTAGE IF CONDUCTOR "ROOK'S" AMPS ARE REDUCED BY A FACTOR OF FOUR AND SIMULTANEOUSLY HALF THE TRANSMISSION OF POWER TRANSFERRED ?

IF PERMISSION IS GRANTED, APPROXIMATELY HOW LONG WOULD IT TAKE AT AN ELECTRICAL SUB-STATION USING "ROOK" CONDUCTORS AT 69KV ( OR 3 X 23KV )AND A TRANSMISSION OF POWER AT 79,902 KILO WATTS TO REDUCE THE AMPS BY A FACTOR OF FOUR IN THAT "ROOK" CONDUCTOR AND SIMULTANEOUSLY DOUBLE THE VOLTAGE IN THAT SAME CONDUCTOR ?

WE WOULD LIKE TO HAVE THESE ANSWERS BEFORE THE FINAL COMMENT PERIOD ENDS ON NOVEMBER 4, 2014 TO FOLLOWUP ON THOSE QUESTIONS AND ANSWERS FOR THE FINAL EIR/EIS .

SCINCERLY, WILLIAM AND SHANNON DAVIS , OWNERS, COUNTY TAX PAID PARCELS, ALL THREE  
OUR PARCELS IN QUESTION 411-170-22-00 411-170-38-00 602-020-08-00  
MAIL TO: 1185 EAST LANE , IMPERIAL BEACH, CA 91932

ACSS = ALUM INUM CONDUCTOR STUCL - SUPPORTED REQ # 4  
 CON CENTRIC - LAY - STANDARD SDFE

RESPONSE  
 JAN 17  
 2014

Finally, with regards to the ability of any future generation to connect to the 69 kV system in East County San Diego – none of the modifications discussed as a part of this project, in and of themselves, will allow interconnection of any proposed generation. Proposed generation will be required to go through the CAISO’s generator interconnection process as specified in the CAISO’s FERC tariff and Business Process Manual (BPM). This process requires extensive, detailed studies of any proposed generation’s effects on the power line system and identifies necessary upgrades to the system for that generation to connect reliably and safely.

c) Ampacity of existing and new 69kV conductors at 37.8°C (100°F) ambient temperature, range from the following:

| Type             | Conductor Material | Temperature (°C) | Ampacity (Amps) |
|------------------|--------------------|------------------|-----------------|
| Existing         | 1/0 Cu             | 75°C             | 270             |
| Existing and New | 636 ACSS/AW        | 132°C            | 1,158           |

1  
 4.330

JOEL  
 SDFE  
 WESTWIND

EXISTING AMPS 270  
 NEW AMPS 1,158

$$\text{WATTS} = \text{VOLTAGE} \times \text{AMPS}$$
$$W = V \times A$$

OLD

$$69 \text{ KW} = 69 \text{ KV} \times 1 \text{ AMP}$$



NEW

$$276 \text{ KW} = 69 \text{ KV} \times 4 \text{ AMPS}$$



$$276 \text{ KW} = 276 \text{ KW} \times 1 \text{ AMP}$$

**SDG&E January 17, 2014 Response**  
**A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC**  
**ED Data Request 4 Dated December 19, 2013**  
**ED-SDGE-004: Q 1-7**

RPT. 84  
625 RECORDS WRITTEN

**SDG&E Response to Q1.1:**

- a) As explained in more detail below, the primary rationale for the proposed conductors on the 69 kV power lines is prudent engineering and judgment by the public utility responsible for the design, construction and maintenance of the 69 kV power line system based upon accepted good practice for the given known local conditions. For the CNF Power Line Replacement Projects, SDG&E is proposing to install the smallest of the standard conductors used by SDG&E for new construction and reconstruction throughout the 69 kV system to ensure compliance with General Order 95 Rule 31.1.

Since the wildfires of 2007, SDG&E has put a tremendous amount of effort into identifying ways to "harden" the overhead electric system. SDG&E has used a multi-stranded steel core conductor that would remain in service even if several steel strands are damaged, including by foreign objects or gunshots, which have been the cause of damaged conductors in the backcountry. With multi-stranded steel core conductors, several of the strands can be damaged but the conductor can remain in service. When selecting a type of conductor to use for the backcountry hardening projects, one of the key factors was mechanical strength characteristics. One of the biggest advantages of ACSS/AW conductor over ACSR/AW conductor is that the conductor depends primarily on the steel core for strength. In addition, the aluminum strands are already annealed (heat treatment that alters a material to increase its ductility) and less affected by extreme heat. ACSS/AW is a standard conductor used by SDG&E. ACSS/AW is unique in that the hoisting grips and the compression fittings/connection dies are specific for each conductor size. The advantages of using standard conductors include the cost effectiveness of only buying and stocking sizes which also provides availability of spare materials, ability to use the same hydraulic presses/dies, reduced outage restoration time due to standard tooling, and keeping spare reels in stock. Using standard conductors also reduces the potential for confusion during construction and maintenance activities. SDG&E primarily uses two different sizes of ACSS/AW conductor, 900 KCMIL ACSS/AW (CANARY) and 636 KCMIL ACSS/AW (ROOK). SDG&E is using the smallest ACSS/AW standard conductor (Rook) on the CNF projects.

ROOK

Considering the majority of the lines in the backcountry have had the same conductor in place for the past 40-50 years, it is prudent to install conductor that will have similar performance history and do not need to be replaced in the near future.

Although there are no specific regulations requiring a specific conductor, General Order 95 Rule 31.1 adopted by D. 12-01-032 provides that:

**31.1 Design, Construction and Maintenance**

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

4/25

FAQs | Glossary | Metal Price Details

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Southwire Product Catalog [ACSS/AW](#)

## ACSS/AW



Residential

Commercial

Mining

Industrial

Transmission

Substation

Distribution

Renewables

OEM

SCR Technologies

Canada

América Latina

Aluminum Conductor.

Aluminum-Clad Steel Supported.

### APPLICATIONS

ACSS/AW is used for overhead distribution and transmission lines. It is designed to operate continuously at elevated temperatures up to 250°C without loss of strength; it sags less under emergency electrical loadings than ACSR/AW, it is self-damping if prestretched during installation; and its final sags are not affected by long term creep of aluminum. The advantages make ACSS/AW especially useful in reconductoring applications requiring increased current with existing tensions and clearances, new line applications where structures can be economized because of reduced conductor sag, new line applications requiring high emergency loadings, and lines where aeolian vibration is a problem. ACSS/AW offers strength characteristics similar to ACSR, along with slightly greater ampacity and resistance to corrosion due to aluminum-cladding of the steel core wires.

### Code Words:

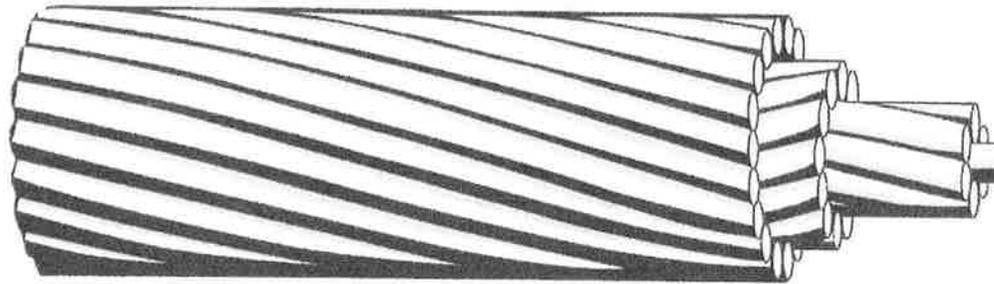
- Flicker, Hawk, Hen, Parakeet, Dove, Eagle, Peacock, Squab, WoodDuck, Teal, Drake, Bittern, Pheasant, Dipper, Martin, Bobolink, Plover, Nuthatch, Parrot, Lapwing,
- Falcon, Chukar, Mockingbird, Mallard, Ruddy, Canary, Rail, Towhee, Cardinal, Canvasback, Snowbird, Curlew, Bluejay, Finch, Bunting, Grackle, Junco, Ostrich, Linnet, Oriole, Brant, Ibis, Lark, Rook, Grosbeak, Scoter, Egret, Flamingo, Gannet, Stilt, Starling, Redwing, Cuckoo, Macaw, Tern, Condor, Roadrunner, Bluebird, Kiwi, Thrasher, Joree

### Product Specifications

"CLICK" ON →  
FOR 3 PAGES OF DETAILS

### RELATED PRODUCTS

- AAAC-6201
- AAC
- AAC/TW
- ACAR
- ACSR
- ACSR/AW
- ACSR/TW
- ACSS
- ACSS/TW
- Armor Wire/Binder Tape
- Motion-Resistant Conductor
- Tie & Ground Wire
- VR2 Cable



## APPLICATIONS

ACSS/AW is used for overhead distribution and transmission lines. It is designed to operate continuously at elevated temperatures up to 250°C without loss of strength; it sags less under emergency electrical loadings than ACSR/AW; it is self-damping if prestretched during installation; and its final sags are not affected by long term creep of aluminum. The advantages make ACSS/AW especially useful in reconductoring applications requiring increased current with existing tensions and clearances, new line applications where structures can be economized because of reduced conductor sag, new line applications requiring high emergency loadings, and lines where aeolian vibration is a problem. ACSS/AW offers strength characteristics similar to ACSS, along with slightly greater ampacity and resistance to corrosion due to aluminum-cladding of the steel core wires.

## SPECIFICATIONS

Southwire's ACSS/AW conductor meets or exceeds the following ASTM specifications:

- B609 Aluminum 1350 Round Wire, Annealed and Intermediate Tempers, for Electrical Purposes.
- B502 Aluminum-Clad Steel Core Wire for Aluminum conductors, Aluminum-Clad Steel Reinforced.
- B856 Concentric-Lay-Stranded Aluminum Conductors, Coated Steel Supported (ACSS).

The strandings available are identical to those listed in ASTM specification B232.

## CONSTRUCTION

ACSS/AW is a composite concentric-lay-stranded conductor. Steel strands form the central core of the conductor with one or more layers of aluminum 1350-0 wire stranded around it. The steel core carries most or all of the mechanical load of the conductor due to the "0" (fully annealed or soft) temper aluminum. Steel core wires are protected from corrosion by an aluminum coating.

# ACSS/AW

| Code Word         | Size (kcmil) | Stranding (Al/St) | Diameter (in)    |       |            |                | Weight Per 1000 ft (lb) |       |       | Rated Strength (lb) | Resistance OHMS/1000 ft |           | Capacity at 200°F (AMPS) |
|-------------------|--------------|-------------------|------------------|-------|------------|----------------|-------------------------|-------|-------|---------------------|-------------------------|-----------|--------------------------|
|                   |              |                   | Individual Wires |       | Steel Core | Complete Cable | Al                      | Steel | Total |                     | DC @ 20°C               | AC @ 75°C |                          |
|                   |              |                   | Al               | Steel |            |                |                         |       |       |                     |                         |           |                          |
| Junco/ACSS/AW     | 266.8        | 30/7              | .0943            | .0943 | .2829      | .66            | 252                     | 140   | 392   | 11200               | .0589                   | .0723     | 841                      |
| Ostrich/ACSS/AW   | 300          | 26/7              | .1074            | .0835 | .2506      | .68            | 283                     | 110   | 393   | 9360                | .0534                   | .0656     | 891                      |
| Linnet/ACSS/AW    | 336.4        | 26/7              | .1137            | .0885 | .2654      | .72            | 317                     | 123   | 440   | 10500               | .0476                   | .0585     | 960                      |
| Oriole/ACSS/AW    | 336.4        | 30/7              | .1059            | .1059 | .3177      | .741           | 318                     | 177   | 494   | 14200               | .0467                   | .0573     | 979                      |
| Brant/ACSS/AW     | 397.5        | 24/7              | .1287            | .0858 | .2574      | .772           | 374                     | 116   | 490   | 10400               | .0407                   | .0501     | 1066                     |
| Ibis/ACSS/AW      | 397.5        | 26/7              | .1236            | .0962 | .2885      | .783           | 374                     | 146   | 520   | 12400               | .0403                   | .0496     | 1077                     |
| Lark/ACSS/AW      | 397.5        | 30/7              | .1151            | .1151 | .3453      | .806           | 375                     | 209   | 584   | 16700               | .0395                   | .0486     | 1092                     |
| Flicker/ACSS/AW   | 477          | 24/7              | .141             | .094  | .2819      | .846           | 449                     | 139   | 589   | 12500               | .0339                   | .0418     | 1195                     |
| Hawk/ACSS/AW      | 477          | 26/7              | .1354            | .1053 | .316       | .858           | 449                     | 175   | 624   | 14900               | .0336                   | .0413     | 1207                     |
| Hen/ACSS/AW       | 477          | 30/7              | .1261            | .1261 | .3783      | .883           | 450                     | 251   | 701   | 20100               | .0329                   | .0405     | 1231                     |
| Parakeet/ACSS/AW  | 556.5        | 24/7              | .1523            | .1015 | .3045      | .914           | 524                     | 163   | 687   | 14600               | .0291                   | .0359     | 1323                     |
| Dove/ACSS/AW      | 556.5        | 26/7              | .1463            | .1138 | .3413      | .927           | 524                     | 204   | 728   | 17500               | .0288                   | .0355     | 1336                     |
| Eagle/ACSS/AW     | 556.5        | 30/7              | .1362            | .1362 | .4086      | .953           | 525                     | 293   | 818   | 22900               | .0282                   | .0348     | 1362                     |
| Peacock/ACSS/AW   | 605          | 24/7              | .1588            | .1058 | .3175      | .953           | 570                     | 177   | 746   | 15900               | .0267                   | .033      | 1397                     |
| Squab/ACSS/AW     | 605          | 26/7              | .1525            | .1186 | .3559      | .966           | 570                     | 222   | 792   | 19000               | .0265                   | .0327     | 1411                     |
| Wood Duck/ACSS/AW | 605          | 30/7              | .142             | .142  | .426       | .994           | 571                     | 318   | 889   | 24400               | .026                    | .032      | 1439                     |
| Teal/ACSS/AW      | 605          | 30/19             | .142             | .0852 | .426       | .994           | 571                     | 311   | 883   | 25000               | .026                    | .032      | 1438                     |
| ★ Rook/ACSS/AW    | 636          | 24/7              | .1628            | .1085 | .3256      | .977           | 599                     | 186   | 785   | 16700               | .0255                   | .0314     | 1444                     |
| Grosbeak/ACSS/AW  | 636          | 26/7              | .1564            | .1216 | .3649      | .991           | 599                     | 233   | 832   | 19900               | .0252                   | .0311     | 1458                     |
| Scoter/ACSS/AW    | 636          | 30/7              | .1456            | .1456 | .4368      | 1.019          | 600                     | 334   | 935   | 25100               | .0247                   | .0305     | 1487                     |
| Egret/ACSS/AW     | 636          | 30/19             | .1456            | .0874 | .4368      | 1.019          | 600                     | 327   | 928   | 26300               | .0247                   | .0305     | 1486                     |
| Flamingo/ACSS/AW  | 666.6        | 24/7              | .1667            | .1111 | .3333      | 1              | 628                     | 195   | 823   | 17500               | .0243                   | .03       | 1489                     |
| Gannet/ACSS/AW    | 666.6        | 26/7              | .1601            | .1245 | .3736      | 1.014          | 628                     | 245   | 872   | 20900               | .024                    | .0297     | 1504                     |
| Stilt/ACSS/AW     | 715.5        | 24/7              | .1727            | .1151 | .3453      | 1.036          | 674                     | 209   | 883   | 18800               | .0226                   | .028      | 1559                     |
| Starling/ACSS/AW  | 715.5        | 26/7              | .1659            | .129  | .3871      | 1.051          | 674                     | 263   | 936   | 22000               | .0224                   | .0277     | 1576                     |
| Redwing/ACSS/AW   | 715.5        | 30/19             | .1544            | .0927 | .4633      | 1.081          | 676                     | 368   | 1044  | 29500               | .022                    | .0272     | 1605                     |
| Cuckoo/ACSS/AW    | 795          | 24/7              | .182             | .1213 | .364       | 1.092          | 749                     | 232   | 981   | 20900               | .0204                   | .0252     | 1671                     |
| Drake/ACSS/AW     | 795          | 26/7              | .1749            | .136  | .408       | 1.107          | 749                     | 292   | 1040  | 24400               | .0202                   | .025      | 1688                     |
| Macaw/ACSS/AW     | 795          | 42/7              | .1376            | .0764 | .2293      | 1.055          | 749                     | 92    | 841   | 11400               | .0209                   | .026      | 1630                     |
| Tem/ACSS/AW       | 795          | 45/7              | .1329            | .0886 | .2658      | 1.063          | 749                     | 124   | 873   | 13500               | .0208                   | .026      | 1620                     |
| Condor/ACSS/AW    | 795          | 54/7              | .1213            | .1213 | .364       | 1.092          | 749                     | 232   | 981   | 15800               | .0204                   | .026      | 1639                     |
| Mallard/ACSS/AW   | 795          | 30/19             | .1628            | .0977 | .4884      | 1.139          | 751                     | 409   | 1160  | 32900               | .0198                   | .0245     | 1721                     |
| Ruddy/ACSS/AW     | 900          | 45/7              | .1414            | .0943 | .2828      | 1.131          | 848                     | 140   | 988   | 15300               | .0183                   | .023      | 1767                     |
| ★ Canary/ACSS/AW  | 900          | 54/7              | .1291            | .1291 | .3873      | 1.162          | 848                     | 263   | 1111  | 23200               | .018                    | .023      | 1779                     |
| Rail/ACSS/AW      | 954          | 45/7              | .1456            | .0971 | .2912      | 1.165          | 899                     | 149   | 1047  | 16200               | .0173                   | .0218     | 1836                     |
| Towhee/ACSS/AW    | 954          | 48/7              | .141             | .1097 | .329       | 1.175          | 899                     | 190   | 1088  | 19000               | .0172                   | .0214     | 1858                     |

SMALL  
★  
FOR  
CONF  
69KV

LARGER  
★



MADE IN THE USA

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# ACSS/AW

|                     |        |       |       |       |       |       |      |     |      |       |       |       |      |
|---------------------|--------|-------|-------|-------|-------|-------|------|-----|------|-------|-------|-------|------|
| Cardinal/ACSS/AW    | 954    | 54/7  | .1329 | .1329 | .3987 | 1.196 | 899  | 279 | 1177 | 24600 | .017  | .0217 | 1848 |
| Canvasback/ACSS/AW  | 954    | 30/19 | .1783 | .107  | .535  | 1.248 | 901  | 491 | 1392 | 39400 | .0165 | .0205 | 1939 |
| Snowbird/ACSS/AW    | 1033.5 | 42/7  | .1569 | .0871 | .2614 | 1.203 | 973  | 120 | 1093 | 14800 | .0161 | .0202 | 1934 |
| Curlew/ACSS/AW      | 1033.5 | 54/7  | .1383 | .1383 | .415  | 1.245 | 973  | 302 | 1275 | 26100 | .0157 | .0201 | 1948 |
| Bluejay/ACSS/AW     | 1113   | 45/7  | .1573 | .1048 | .3145 | 1.258 | 1048 | 173 | 1222 | 18900 | .0148 | .0088 | 2034 |
| Finch/ACSS/AW       | 1113   | 54/19 | .1436 | .0861 | .4307 | 1.292 | 1053 | 318 | 1372 | 28800 | .0146 | .0188 | 2040 |
| Bunting/ACSS/AW     | 1192.5 | 45/7  | .1628 | .1085 | .3256 | 1.302 | 1123 | 186 | 1309 | 20300 | .0138 | .0176 | 2134 |
| Grackle/ACSS/AW     | 1192.5 | 54/19 | .1486 | .0892 | .4458 | 1.337 | 1129 | 341 | 1470 | 30800 | .0137 | .0176 | 2135 |
| Bittern/ACSS/AW     | 1272   | 45/7  | .1681 | .1121 | .3362 | 1.345 | 1198 | 198 | 1396 | 21600 | .013  | .0165 | 2215 |
| Pheasant/ACSS/AW    | 1272   | 54/19 | .1535 | .0921 | .4604 | 1.381 | 1204 | 364 | 1568 | 32800 | .0128 | .0165 | 2227 |
| Dipper/ACSS/AW      | 1351   | 45/7  | .1733 | .1155 | .3465 | 1.386 | 1272 | 210 | 1483 | 23000 | .0122 | .0156 | 2304 |
| Martin/ACSS/AW      | 1351   | 54/19 | .1582 | .0949 | .4745 | 1.424 | 1279 | 386 | 1665 | 34900 | .012  | .0156 | 2307 |
| Bobolink/ACSS/AW    | 1431   | 45/7  | .1783 | .1189 | .3566 | 1.427 | 1348 | 223 | 1571 | 24300 | .0115 | .0148 | 2391 |
| Plover/ACSS/AW      | 1431   | 54/19 | .1628 | .0977 | .4884 | 1.465 | 1354 | 409 | 1764 | 36900 | .0114 | .0148 | 2405 |
| Nuthatch/ACSS/AW    | 1510   | 45/7  | .1832 | .1221 | .3664 | 1.465 | 1422 | 235 | 1657 | 25700 | .0109 | .0141 | 2476 |
| Parrot/ACSS/AW      | 1510   | 54/19 | .1672 | .1003 | .5017 | 1.505 | 1429 | 432 | 1861 | 38900 | .0108 | .0141 | 2491 |
| Lapwing/ACSS/AW     | 1590   | 45/7  | .188  | .1253 | .3759 | 1.504 | 1498 | 248 | 1745 | 27000 | .0104 | .0134 | 2560 |
| Falcon/ACSS/AW      | 1590   | 54/19 | .1716 | .103  | .5148 | 1.544 | 1505 | 455 | 1960 | 41100 | .0102 | .0134 | 2576 |
| Chukar/ACSS/AW      | 1780   | 84/19 | .1456 | .0873 | .4367 | 1.601 | 1685 | 327 | 2012 | 33600 | .0093 | .012  | 2772 |
| Mockingbird/ACSS/AW | 2034.5 | 72/7  | .1681 | .1121 | .3362 | 1.681 | 1926 | 198 | 2124 | 26500 | .0082 | .0109 | 2972 |
| Roadrunner/ACSS/AW  | 2057   | 76/19 | .1645 | .0768 | .3839 | 1.7   | 1947 | 253 | 2200 | 30300 | .0081 | .0108 | 3007 |
| Bluebird/ACSS/AW    | 2156   | 84/19 | .1602 | .0961 | .4806 | 1.762 | 2041 | 396 | 2437 | 40700 | .0077 | .0102 | 3130 |
| Kiwi/ACSS/AW        | 2167   | 72/7  | .1735 | .1157 | .347  | 1.735 | 2051 | 211 | 2262 | 28200 | .0077 | .0104 | 3092 |
| Thrasher/ACSS/AW    | 2312   | 76/19 | .1744 | .0814 | .407  | 1.802 | 2188 | 284 | 2472 | 34100 | .0072 | .0097 | 3235 |
| Joree/ACSS/AW       | 2515   | 76/19 | .1819 | .0849 | .4245 | 1.88  | 2380 | 309 | 2689 | 37100 | .0066 | .0091 | 3407 |

**Notes:**

- (1) Data based on a nominal cable manufactured in accordance with ASTM B 856.
- (2) Resistance and ampacity based on an aluminum conductivity of 63% IACS at 20°C, and an aluminum-clad steel conductivity of 20.3% IACS at 20°C.
- (3) Ampacity based on a 200°C conductor temperature, 25°C ambient temperature, 2 ft/sec wind, in sun, with emissivity of 0.5 and a coefficient of solar absorption of 0.5, at sea level.
- (4) Rated strengths based on aluminum-clad steel core wire in accordance with ASTM B 502.



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# Watts - volts - amps - ohms calculator

Watts (W) - volts (V) - amps (A) - ohms ( $\Omega$ ) calculator.

Calculates power / voltage / current / resistance.

Enter 2 values to get the other values and press the Calculate button:

VALUE #3

Enter watts:

79902

NEW KILO-WATTS

kilo-watts (kW)

Enter volts:

★

295.933333

ANSWER #2

kilo-volts (kV)

Enter amps:

270

EXISTING AMPS

amps (A)

Enter ohms:

1096.04938

ohms ( $\Omega$ )

STEP #2

PT. 33 3546 RECORDS WRITTEN

# Watts - volts - amps - ohms calculator

Watts (W) - volts (V) - amps (A) - ohms ( $\Omega$ ) calculator.

Calculates power / voltage / current / resistance.

Enter 2 values to get the other values and press the Calculate button:

Enter watts:

79902

=

kilo-watts (kW)

ANSWER #1

Enter volts:

69

kilo-volts (kV)

Enter amps:

1158

NEW AMPS

amps (A)

Enter ohms:

59.5854922

ohms ( $\Omega$ )

STEP #1

VALUE #1

VALUE #2

HOW ABOUT THE "NEW" LINES ABILITY (TL OR C)  
TO CARRY VOLTAGE  
IF THE AMPS ARE REDUCED

b) Describe the basis for SDG&E's statement that "These proposed reconfigurations do not in any way alter the potential system load nor allow for an increase in system capacity."

Is SDG&E suggesting that increasing the size of the conductor will not result in a corresponding increase in the ability of the lines to carry additional current and hence increase the system's ability to transmit power? If so, fully explain the electrical and applicable laws of physics used in support of the statement. If not, fully describe the impact the new conductor will have on the lines ability to transmit power.

c) With regard to the following statement:

From a technological perspective, the capacity of these power lines is limited to the voltage ratings of the substation facilities and other related equipment. To increase the system capacity, the installation of additional substation and associated equipment would be required. The Proposed Action does not include the installation of such equipment; therefore, the voltage rating and system capacity will remain the same. In addition, SDG&E would have to obtain CAISO approval and CPUC authority to increase the voltage ratings (i.e., the capacity of these lines). SDG&E is not requesting this authority from the CPUC or CAISO.

WHAT ABOUT THE APPROVAL

OF THE CPUC OR OTHER FEDS?

SDG&E January 17, 2014 Response  
A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC  
ED Data Request 4 Dated December 19, 2013  
ED-SDGE-004: Q 1-7

RPT. 60  
2273 RECORDS WRITTEN

**Question 1.2-1 System Capacity**

The Forest Service, in its December 7, 2012 comments on the preliminary Plan of Development asked the following question: Section, 4.1, Single to Double Circuit Conversion, **Question 1:** "The POD emphasizes that the proposed action would not increase system capacity, yet doubling certain circuits would appear to increase the capacity of the system between selected substations. The proposed action should explain any changes to system capacity that will result from the additional circuits."

**Follow-up questions to SDG&E's response (02/15/13) are as follows:**

- a) The common definition of "system capacity" is the maximum amount of power, generally expressed in terms of MVA or MW that can be transferred from one location to another. In the context of a transmission line the term "capacity" would imply the maximum amount of electric power that can be transferred over the transmission facility in a reliable manner. While the **voltage** of the facility is a key parameter the amount of **current** (ampacity) the conductor can safely transmit is also critical in determining the power transferred. For example a 69kV line capable of carrying 100 amps will have twice as much capacity to transmit power as a line carrying 50 amps.

EXAMPLE

YES, THE WATTS DOUBLE, IF THE VOLTS REMAIN AT 69KV

FOR EXISTING AND NEW

In light of the above please provide all sources relied upon in support of the statement "System capacity", as used in this context, refers to the nominal operating voltages of the transmission facilities in question" Fully explaining why capacity is solely tied to voltage and not to power being transmitted.

- b) Describe the basis for SDG&E's statement that "These proposed reconfigurations do not in any way alter the potential system load nor allow for an increase in system capacity."

Is SDG&E suggesting that increasing the size of the conductor will not result in a corresponding increase in the ability of the lines to carry additional current and hence increase the system's ability to transmit power? If so, fully explain the electrical and applicable laws of physics used in support of the statement. If not, fully describe the impact the new conductor will have on the lines ability to transmit power.

THE CAPACITY EXISTS IF AMPS ARE REDUCED

- c) With regard to the following statement:

From a technological perspective, the capacity of these power lines is limited to the voltage ratings of the substation facilities and other related equipment. To increase the system capacity, the installation of additional substation and associated equipment would be required. The Proposed Action does not include the installation of such equipment; therefore, the voltage rating and system capacity will remain the same. In addition, SDG&E would have to obtain CAISO approval and CPUC authority to increase the voltage ratings (i.e., the capacity of these lines). SDG&E is not requesting this authority from the CPUC or CAISO.

AND THE WATTS REMAIN CONSTANT

7/25

**SDG&E January 17, 2014 Response**  
**A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC**  
**ED Data Request 4 Dated December 19, 2013**  
**ED-SDGE-004: Q 1-7**

Please list all equipment that is referred to as placing limitations on the transmission of power over the referenced facilities once the planned larger conductors have been installed. Please provide the rating (expressed in Amps or MVA) for each limiting piece of equipment as well as the ampacity of the existing and proposed conductor.

**SDG&E Response to Q1.2-1:**

a) As explained more fully below, Commission precedent is the source for the statement that "capacity" refers to the nominal operating voltages of the power line facilities in question and is tied to voltage, not to power being transmitted.

In D.94-06-014, OII No. 83-04-03, Filed April 20, 1983, the Commission issued General Order (GO) 131-D which expanded the previous rules to cover the construction of electric power line and substation facilities designed to operate between 50 and 200 kilovolts (kV). These rules are responsive to the requirements of the California Environmental Quality Act (CEQA) (Public Resources (Pub. Res.) Code § 21000 et seq.). The tiered permitting structure adopted under G.O. 131-D, Section III, treats the voltage rating of the electric transmission/power/distribution line or substation facilities as its designed maximum "capacity". The CPUC has reaffirmed this in D. 03-08-033 (*City of Santee vs. San Diego Gas & Electric Company*, 2003 Cal. PUC LEXIS 445, at \*6-7.). Further, in D.94-06-014, at \*29, the Commission specifically rejected a similar ampacity rating proposal submitted in OII No. 83-04-03 by the Northern California Power Agency (NCPA) and the City of Anaheim, which argued "that a 10 MW increase in transmission capacity is the appropriate threshold for triggering CEQA review under the permit-to-construct process". As Commissioners Michael R. Peevey, President; Carl W. Wood; Loretta M. Lynch; Geoffrey F. Brown; and Susan P. Kennedy unanimously expressed in D. 03-08-033, at \*7, "[a] narrow reading of the notion of "capacity" in the CEQA Guidelines is inconsistent with the broader purpose of the exemptions in the GO and would potentially lead to unlimited reconsideration of routine power line maintenance practices."

See SDG&E Response to Q1.2-1. The proposed reconfigurations will not cause system load to change, nor will they increase "capacity" as that term has been defined by the Commission. **SDG&E does not dispute that modifications necessary to increase the size of the electric power line conductor will generally increase the existing power transfer capability between substations, however, pursuant to G.O. 131-D the current operational voltage "capacity" rating of the facilities will remain the same under the proposed projects' design.** Furthermore, as discussed more fully below, power transfer is not a function of a line's capacity. It is determined by the terminal voltages and the line impedance.

AT A CONSTANT VOLTAGE 69 KV  
 CONDUCTOR TRANSFER CAPABILITY IN WATTS INCREASE PROPORTIONALLY TO AN INCREASE IN AMPERE

69 KV FOR EXISTING AND NEW

WATTS = VOLTS x AMPS  
 POWER TRANSFER CAPABILITY

8/25

643 RECORDS WRITTEN  
 RPT. 99

SDG&E January 17, 2014 Response  
A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC  
ED Data Request 4 Dated December 19, 2013  
ED-SDGE-004: Q 1-7

B  
CONT

Specifically with regards to the “doubling” of certain 69 kV circuits (i.e. the loop-in of TL625 to Loveland substation) – this project is required to mitigate a specific forecast N-1 overload (i.e. the potential overload of TL626 for loss of the three-terminal TL625). This forecast overload is due to projected load growth by the distribution customers served by this section of the 69 kV system in East County San Diego. The California Independent System Operator (CAISO) reviewed and approved this project as necessary to reliably serve customer load in this area. So, to that extent, the loop-in of TL625 will increase the load-serving capability of the power line system.

The main reason for double circuiting in the two cases presented in this project are for reliability, not capacity. This is evident in the fact the double circuit structures do not go from sub to sub, rather only from one substation to a bifurcation point. This allows for the splitting up of a single line to two lines, ultimately improving reliability.

Generally speaking, however, a simple increase in conductor size will not necessarily result in an increase in the load-serving capability of a specific power line. There are numerous other elements that affect the load-serving capability of the system (thermal ratings of breakers, switches, jumpers, and other current-carrying components, voltage limitations, limitations on available generation, etc.)

Finally, with regards to the ability of any future generation to connect to the 69 kV system in East County San Diego – none of the modifications discussed as a part of this project, in and of themselves, will allow interconnection of any proposed generation. Proposed generation will be required to go through the CAISO’s generator interconnection process as specified in the CAISO’s FERC tariff and Business Process Manual (BPM). This process requires extensive, detailed studies of any proposed generation’s effects on the power line system and identifies necessary upgrades to the system for that generation to connect reliably and safely.

c) Ampacity of existing and new 69kV conductors at 37.8°C (100°F) ambient temperature, range from the following:

| Type             | Conductor Material | Temperature (°C) | Ampacity (Amps) |
|------------------|--------------------|------------------|-----------------|
| Existing         | 1/0 Cu             | 75°C             | 270             |
| Existing and New | 636 ACSS/AW        | 132°C            | 1,158           |

9/25

SDG&E January 17, 2014 Response  
A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC  
ED Data Request 4 Dated December 19, 2013  
ED-SDGE-004: Q 1-7

RPT. 51  
0 RECORDS WRITTEN

C  
COPY

As mentioned in SDG&E's response to Q1.1, transmission power transfer is limited by the most limiting power line element. Such elements include, but are not limited to, current transformers, jumpers, disconnect switches, circuit breakers, relay setting etc. To list the ratings for such equipment would require analysis of a specific power line, especially in the case of relay settings.

YES, HOWEVER

IF: THE NEW CONDUCTOR CAN "TRANSFER"  
79,902 KW AT 69 KV AND 1150 AMPS (4X)  
 $W = V \times A$

---

THEN: THE NEW CONDUCTOR CAN "TRANSFER"  
79,902 KW AT 295 KV AND 270 AMPS (1X)  
 $W = V \times A$

39,951 KW AT OR 138KV AND 540 AMPS (2X)

10/25

**SDG&E January 17, 2014 Response**  
**A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC**  
**ED Data Request 4 Dated December 19, 2013**  
**ED-SDGE-004: Q 1-7**

RPT. 02  
549 RECORDS WRITTEN

**Question 1.2-2 System Capacity- Upgrading the Conductors**

The Forest Service, in its December 7, 2012 comments on the preliminary Plan of Development asked the following question: Section, 4.1, Single to Double Circuit Conversion, **Question 2:** "Upgrading the conductors on the 69 kV systems would also appear to increase overall system capacity. Please explain any changes to the system capacity that will result from the upgraded conductors."

**Follow-up questions to SDG&E's response (02/15/13) are as follows:**

**A** a) SDG&E includes the following statement in its response:

*Although the proposed conductors are physically capable of transmitting voltages higher than 69 kV, as discussed previously, the Proposed Action does not include or authorize any increase in voltage rating. Any such increases to system capacity would require changes to the substation and other infrastructure.*

Why does SDG&E link increases in system capacity, which is a measure of power transfer (generally measured in MVA or MW), only to voltage and does not recognize that capacity (power transfer) will be increased as a result of larger conductors operating at 69kV? What would the transfer capacity (measured in MVA or MW) of the lines be, based on the new conductor and existing substation equipment?

WATTS  
OR  
VOLT x AMP

**B** b) Is there a megawatt limit to what could interconnect with the system, e.g., could renewable energy projects interconnect with the power line facilities being installed? If yes, please explain.

**SDG&E Response to Q1.2-2:**

**A** a) Reference Question 1.2-1a in response to the Commission's adopted definition of system capacity. Generally, the MVA rating is 138 MVA for new 69kV - 636 ACSS/AW conductor and 132°C maximum allowable steady state conductor temperature rating. The 69kV line specific ratings are dependent on line specific data including, substation equipment, phase spacing and line mileage which would require more extensive analysis and studies.

Furthermore, power transfer is not a function of a line's capacity. It is determined by the terminal voltages and the line impedance. A power line is part of a network and the amount of power flow is determined by the network configuration and local sources and sinks, not by the size of the conductor. The transfer capability of this specific portion of the power line system is also dependent on other system parameters, including voltage, load, generation dispatch, availability of sources of reactive power, and so forth.

69 kV  
1155 AMP  
79,902 WATTS  
OR  
138 KV  
579 AMP  
39,951 WATTS

11/25

12/25

RPT. 12 6912 RECORDS WRITTEN

SDG&E January 17, 2014 Response  
A. 12-10-009 Cleveland National Forest Power Line Replacement Projects PTC  
ED Data Request 4 Dated December 19, 2013  
ED-SDGE-004: Q 1-7

B (b) The size of a generator allowed to connect to the SDG&E power line system is determined by transmission planning studies, as described by the California ISO's FERC-approved tariff and Business Process Manual. The size limit, in terms of megawatts, is determined by many factors, including the size of the interconnecting facilities, proximity of other generation, the technology of the specific generator, etc. Generally speaking, the greater the current-carrying capability of the interconnected facilities the larger the allowable generation, but there may be other limiting elements that need to be taken into account.

An entity seeking interconnection for any new generation would be required to obtain all necessary approvals and undergo environmental review as required by law prior to interconnection.

IF YOU DROP THE CURRENT 50% 79902 → 39951  
AND YOU DROP THE AMPS 400% 1158 → 286  
THE JOLTS INCREASE 100% 69KV → 138KV+

### Watts - volts - amps - ohms calculator

Watts (W) - volts (V) - amps (A) - ohms (Ω) calculator.

Calculates power / voltage / current / resistance.

Enter 2 values to get the other values and press the Calculate button:

|                         |           |
|-------------------------|-----------|
| Enter watts: 39951      | watts (W) |
| Enter volts: 139.688811 | volts (V) |
| Enter amps: 286         | amps (A)  |
| Enter ohms: 0.488422417 | ohms (Ω)  |

12/25

12/25

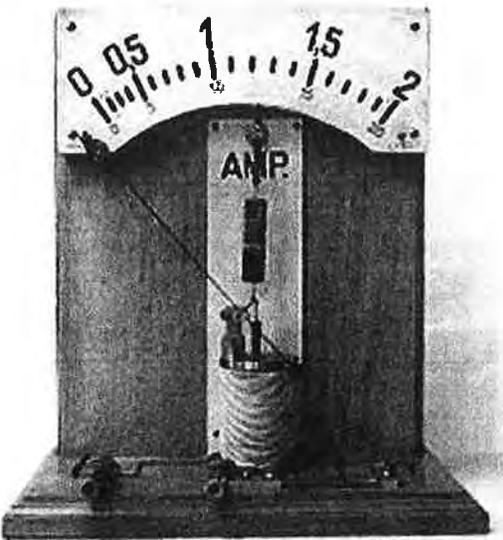
# Ampere

From Wikipedia, the free encyclopedia

The **ampere** (SI unit symbol: **A**; SI dimension symbol: **I**), often shortened to **amp**,<sup>[1]</sup> is the SI unit of electric current<sup>[2][3]</sup> (quantity symbol: *I*, *i*)<sup>[4]</sup> and is one of the seven<sup>[5]</sup> SI base units. It is named after André-Marie Ampère (1775–1836), French mathematician and physicist, considered the father of electrodynamics.

In practical terms, the ampere is a measure of the amount of electric charge passing a point in an electric circuit per unit time, with  $6.241 \times 10^{18}$  electrons (or one coulomb) per second constituting one ampere.<sup>[6]</sup>

### Ampere



Demonstration model of a moving iron ammeter. As the current through the coil increases, the plunger is drawn further into the coil and the pointer deflects to the right.

**Unit information**

| Unit system | SI base unit       |
|-------------|--------------------|
| Unit of     | Electric current   |
| Symbol      | A = AMP            |
| Named after | André-Marie Ampère |

The practical definition may lead to confusion with the definition of the coulomb (i.e., 1 ampere-second) and the ampere-hour (A·h), but amperes can be viewed as measuring a flow rate, the number of (charged) particles transiting per unit time, and coulombs simply as an amount, the total number of particles.

THE HIGHER THE AMPS AT A CONSTANT VOLTAGE (69 KV)  
 THE HIGHER THE ELECTRIC CURRENT  
 CARRYING CAPACITY 10/3/2014

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**From:** Steve Green <steveg@dimcom.net>  
**Sent:** Wednesday, October 22, 2014 3:50 AM  
**To:** CNFMSUP  
**Cc:** Kathy Goddard; Wilson, Adam; Jerry Wallenborn; Jeanine Hawkins; Supervisor Bill Horn; Supervisor Dianne Jacob; Supervisor Dave Roberts; Supervisor Greg Cox; Supervisor Ron Roberts  
**Subject:** powerline though CU-1

Dear Mr. Metz,

Last week my neighbors informed me of a meeting that the USFS and the California Public Utilities Commission held in Alpine on October 1st which included discussion of the electric lines that pass through the CU-1 area where my land is located. These electric lines go directly across my property located at 15785 Boulder Creek Road and have supplied my neighbor the McCoys and I with electricity since the 1940s. It seems some people find these electric lines unaesthetic and propose their removal.

Unfortunately I never received notification of this important meeting and only learned about it after it had come and gone. I'm very surprised by this oversight considering I am one of the larger land owners in the area and one of the few serviced by these lines. Not to mention that you and I have had recent communications about this area and I have voiced my concerns with these and similar land use issues at public meetings we have both attended and spoken at. Why did I not receive notification about this meeting? Have there been other meetings I was not notified about? Please put me on the notification list for all future meetings that affect my property.

As I am sure you are aware I am opposed to any changes to my current electrical service and potential future service and or upgrades. I would not have bought my 160 acres on Boulder Creek Road if it did not have reliable electrical power supplied by the grid. The price I paid and the value of my property reflect this. Land without grid power is worth considerably less.

In the past you have recommended the CU-1 areas surrounding my and my neighbors' property to be designated "Wilderness." I am opposed to this because this land does not qualify as per the definition. The electric lines in question are one of the reasons. To remove the electric lines in a step towards complying with the "Wilderness" definition would be a "Taking" of our lands utility and a violation of our private property rights. Removal would also be a step backwards for the infrastructure that serves the citizens of San Diego county. I am not opposed to solutions mitigating the visual impact such as burying the lines, however I am 100% opposed to removal or downgrading the electrical service that I paid for and rely on.

Please confirm receipt of this email, thank you.

Sincerely,

Steve Green  
PO Box 188  
Golden, CO 80402

tel: 303.933.7670

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**From:** Sandra Wilson <descansobusiness@gmail.com>  
**Sent:** Monday, October 27, 2014 3:41 PM  
**To:** CNFMSUP  
**Subject:** SDGE Master Permit

I am concerned about the placement of a pole at Hwy 79 and Viejas Blvd. in Descanso. Your proposal of pole placement is an eyesore. It is in front of a business that is a quaint store and fruit stand. At present, the wood pole does not distract from the ascetics of the property, but the new metal pole is very large and very industrial.

Visitors going to Julian driving along Hwy 79 will have their eyes directed right at the pole. If the pole was located across the street on the SW side of the corner, it would not be such an eyesore. Redirecting the pole across the street should not cause a problem with how the lines are running.

EMF's are also a concern. I couldn't tell if the lines were running by the Descanso Elementary. Could you give me information regarding that. On page 7 there is information about occupational limits to 60 HZ EMF's to no longer than 2 hours. While the people of the community don't work here, they definitely live here and that would equate to longer than 2 hours. I would call that a health hazard. In the report on pages 2 & 4 the report says two contradicting things. One says that the EMF's are stopped by objects and the other says that EMF's go through objects---- which is it?

I was also concerned that brush clearing around the poles was done by chemicals. Around the poles on Viejas Blvd. I have noticed that weeds don't grow around some of the poles, but I have been assured by SDGE that they don't use chemicals. Then how do the weeds not grow?

I am also concerned that a staging area opened up in a field at the eastern edge of Descanso with out community notification. The Planning Group was not informed. Isn't the community suppose to be notified of a commercial use of their agriculture properties???

Water use from any area that is reliant on ground water should not be considered under any circumstances. All areas above Alpine in the Easter section of San Diego County rely solely on ground water. All water needs should not be taken from anyone selling their well water in this area.

Thank you for your prompt reply to my concerns.

Sandra Wilson  
25280 Manzanita Ln  
Descanso, CA 91916

**GERALD W. FISHER**

OCT 30 2014

23550 Hwy. 76 Santa Ysabel, CA 92070•Phone 760-782-9208•Fax 760-782-0824•jfisher760@aol.com

To: Lisa Orsaba, California Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest

c/o Rica Nitka  
Dudek Office  
605 Third Street  
Encinitas, CA 92024

Re: MSUP and PTC Power Line Replacement Projects Draft EIR/EIS, TL682  
23550 Hwy. 76, Santa Ysabel, CA 92070

Ladies and Gentlemen,

Thank you for the information<sup>1,2</sup>. Based upon research and data to date<sup>3</sup>, an apparent strong basis for CPUC decisions, SDG&E steel poles only withstand winds up to 85 MPH is CEQA Class I, not Class IV – very important. The solution – undergrounding.

Recent 100 MPH winds from a SDG&E mountain site documents a wind speed that can virtually double when it gets squeezed<sup>4</sup> in its journey through canyons and valleys. This example would put the 85 MPH pole up against 150 MPH± wind gusts. Thus, there is no safety benefit as it is currently proposed or enhanced. In addition, the poles don't start fires; it is the wires that start fires.

The Scenic Highway Code Sections 260-284, including Section 320 of the California Public Code passed by the State Legislature, is very relevant.

[Note:] Section 262.5 has wording “shall” that mandates designation of any State Highway as an official State Scenic Highway within a United States National Forest.

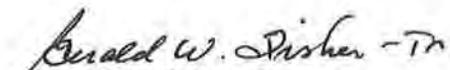
We have legal support<sup>5</sup> that opines the “shall”. Also, the Sierra Club, long-time supporters of forest issues, fully backs this area for Scenic Highway designation. Please also note that AT&T has recognized Section 320 of CPUC and has already puts its lines underground in the highway ROW; it would be very convenient for SDG&E to do likewise.

Our business experience asks “What is the best for both sides, without one taking from another? The answer is a \$100,000,000 40-year Bond<sup>6</sup>.

The math: 4%/40 years, spread among 1,300,000 ratepayers is 32 cents/mo!! This would be a great PR piece!

This would underground 100 miles of lines at \$1,000,000<sup>7</sup> per mile – a great benefit to all parties. Safety, financial, values, flora and fauna --- all win.

Respectfully submitted,

  
Gerald W. Fisher, Trustee

Ref: (1) MOA for EIR/EIS (2) Executive Summary Draft EIR/EIS (3) Union-Tribune article by J. Harry Jones, 10-23-14 (4) NOAA San Diego Station (5) Tosdal Law Firm (6) Wall St. (7) Sempra

# STREETS AND HIGHWAYS CODE

## SECTION 260-284

260. It is the intent of the Legislature in designating certain portions of the state highway system as state scenic highways to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. It is further declared to be the intent of the Legislature in designating such scenic highways to assign responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate thereto and to indicate, in broad statement terms, the location and extent of routes and areas requiring continuing and careful co-ordination of planning, design, construction, and regulation of land use and development, by state and local agencies as appropriate, to protect the social and economic values provided by the State's scenic resources.

261. The department shall establish and apply pertinent planning and design standards for development of official scenic highways.

In establishing and applying such standards for, and undertaking the development of, official scenic highways, the department shall take into consideration the concept of the "complete highway," which is a highway which incorporates not only safety, utility, and economy but also beauty. The department shall also take into consideration in establishing such standards that, in a "complete highway," pleasing appearance is a consideration in the planning and design process. In the development of official scenic highways, the department shall give special attention both to the impact of the highway on the landscape and to the highway's visual appearance. The standards for official scenic highways shall also require that local governmental agencies have taken such action as may be necessary to protect the scenic appearance of the scenic corridor, the band of land generally adjacent to the highway right-of-way, including, but not limited to, (1) regulation of land use and intensity (density) of development; (2) detailed land and site planning; (3) control of outdoor advertising; (4) careful attention to and control of earthmoving and landscaping; and (5) the design and appearance of structures and equipment.

262. Whenever the department determines that the corridor protection program for any state highway in the state scenic highway system established by this article has been implemented by local governmental agencies and a plan and program has been developed by the department for bringing the highway up to the standards for official scenic highways established by the department, including the concept of the "complete highway," as described in Section 261, the department shall designate the highway as an official state scenic

highway and shall so indicate the highway in any publications of the department or in any maps which are issued by the department to the public.

The department shall cause appropriate signs to be placed and maintained along the portions of the state scenic highway system which the department has designated as official state scenic highways that indicate that the highways are official state scenic highways.

If at any time the department determines that the corridor protection program of local governmental agencies, with respect to any highway which has been designated as an official state scenic highway, no longer adequately carries out responsibility of the local governmental agencies for the protection of the scenic corridor, it may revoke the designation of the highway as an official state scenic highway and remove the signs which so indicate the highway.

262.1. A local agency, as defined in subdivision (c) of Section 65402 of the Government Code, shall coordinate its planning with, and obtain the approval from, the appropriate local planning agency on the location and construction of any new district facility that would be within the scenic corridor of any state scenic highway.

262.5. (a) Whenever the department determines that any state highway within or traversing United States National Forest lands meets the standards for official state scenic highways, the department shall designate the highway as an official state scenic highway and shall so indicate the highway in any publications of the department or in any maps which are issued by the department to the public.

(b) The department shall cause appropriate signs to be placed and maintained along those portions of the highways which the department has designated pursuant to subdivision (a) as official state scenic highways that indicate that those portions of the highways are official state scenic highways.

(c) If at any time the department determines that a state highway, designated as an official state scenic highway pursuant to subdivision (a), no longer meets the standards for official state scenic highways, it may revoke the designation of the highway as an official state scenic highway and remove the signs which so indicate the highway.

263. The state scenic highway system is hereby established and shall be composed of the highways specified in this article. The highways listed in Sections 263.1 to 263.8, inclusive, are either eligible for designation as state scenic highways or have been so designated.

263.1. The state scenic highway system shall include:

Routes 28, 35, 38, 52, 53, 62, 74, 75, 76, 89, 96, 97, 127, 150, 151, 154, 156, 158, 161, 175, 197, 199, 203, 209, 221, 236, 239, 243, 247, 254, and 330 in their entirety.

Caltrans guidelines re 1,000 ft. rule

Website for Caltrans guidelines re: scenic highways....for "1,000 ft. rule", see pg.11

[http://www.dot.ca.gov/hq/LandArch/scenic/guidelines/scenic\\_hwy\\_guidelines\\_04-12-2012.pdf](http://www.dot.ca.gov/hq/LandArch/scenic/guidelines/scenic_hwy_guidelines_04-12-2012.pdf)

#### **Undergrounding of Utility Lines**

Section 320 of the California Public Utilities Code requires the undergrounding of all new or relocated electric and communication distribution facilities within 1,000 feet of any highway designated an official scenic highway and visible from that highway where feasible. Appendix A provides the full text of Section 320. Copies of the Public Utilities Commission's Order and Court Decisions Relating to Section 320 are available from the Caltrans District Scenic Highway Coordinator, and provide more detail on utility undergrounding. The California Public Utilities Commission makes final determinations regarding exceptions to undergrounding utilities.

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**From:** Maegan Martin <maegan.martin33@gmail.com>  
**Sent:** Thursday, October 30, 2014 11:42 AM  
**To:** CNFMSUP  
**Subject:** Re: My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our

My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our land for 74 years. This land has been in my family since the late 1800's. My ancestors were some of the original Julian Pioneers. Our land as well as our family depends on having electricity. I am opposed to any changes made by SDG&E that will end in the removal of our power lines. Removing the electrical lines would devastate our family as well as our way of life. I understand that upgrades being made to the current electrical lines will better insure the safety of us all out here against fires. I am not opposed to the upgrades; however I want to make it very clear that these upgrades will not be any more invasive to our property than it has been in the past. All upgrades need to remain in the same position on the same grid. I have heard mention of the idea that all power be removed do to the "wilderness" area that surrounds our private property. I see no reason why we would remove something that has been a part of our life for seventy plus years. Electrical grids contribute to not only our everyday way of life but the value of our property as well.

Maegan McCoy (Martin)

505-803-8048

[Maegan.martin33@gmail.com](mailto:maegan.martin33@gmail.com)

On Thu, Oct 30, 2014 at 12:05 PM, CNFMSUP <[CNFMSUP@dudek.com](mailto:CNFMSUP@dudek.com)> wrote:

Hi Maegan,

Would you mind resending this message with your comment in the body of an email? There are character restrictions on the subject field so unfortunately the full content of your message isn't coming through.

Thanks.

**From:** Maegan Martin [mailto:[maegan.martin33@gmail.com](mailto:maegan.martin33@gmail.com)]

**Sent:** Wednesday, October 29, 2014 10:24 AM

**To:** CNFMSUP

**Subject:** My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our I...

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**From:** j hawkins <hawkinslj1980@yahoo.com>  
**Sent:** Thursday, October 30, 2014 7:30 PM  
**To:** CNFMSUP  
**Cc:** Kathy Goddard; Adam Wilson; Steve Green; Supervisor Greg Cox; Jerry Wallenborn; Supervisor Dave Roberts; Supervisor Dianne Jacob; Supervisor Ron Roberts; Supervisor Bill Horn  
**Subject:** CPUC/USFS SDG&E Power Line Replacement Project

## Written Comment Form

Helen Joan McCoy-Anderson  
Charles E McCoy Trust  
P O Box 811  
Ramona, California 92065  
Phone #619 892-1515  
Email: [hawkinslj1980@yahoo.com](mailto:hawkinslj1980@yahoo.com)

Subject Line: SDG&E Master Permit-DEIR/DEIS Comments

Attn: Lisa Orsaba, CPUC Project Manager  
Attn: Will Metz, Forest Supervisor, Cleveland National Forest

I support SDG&E proposed power line replacement project for upgrading existing 69KV and 12KV electric lines with fire resistance poles and lines. I object to the Federal proposed action to relocate power lines (TL626). I furthermore, object to the additional alternative of removal of TL626 from service.

These power lines have provided public utilities to the Boulder Creek area of Julian since the 1940's. Removal or relocating existing lines is an unnecessary inconvenience and costly proposal. Any change to the existing lines could negatively affect access to electricity for necessary lights, power, and water wells. The federal proposed action to relocate power lines and the additional alternative to remove TL626 from service adversely affects the agricultural businesses and citizens of the area.

Please precede with SDG&E proposed line replacement projects for improved fire resistant poles and lines and don't interfere with private property rights. This current infrastructure serves our back country areas from Descanso/Alpine to Julian/Santa Ysabel. It is valuable resource that we don't want changed. Please confirm receipt of this email.

Sincerely,

Helen Joan McCoy-Anderson, Trustee  
Charles E McCoy Trust

APN 333-061-02-00

APN333-040-03-00  
APN333-070-01-00

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**From:** j hawkins <hawkinslj1980@yahoo.com>  
**Sent:** Thursday, October 30, 2014 7:54 PM  
**To:** CNFMSUP  
**Cc:** Kathy Goddard; Adam Wilson; Steve Green; Jerry Wallenborn; Supervisor Dianne Jacob; Supervisor Dave Roberts; Supervisor Greg Cox; Supervisor Ron Roberts; Supervisor Bill Horn  
**Subject:** CPUC/USFS SDG&E Power Line Replacement Projects

## Written Comment Form

Jeanine Hawkins  
P O Box 3541  
Ramona, California 92065  
Phone #760-470-8814  
Email: [hawkinslj1980@yahoo.com](mailto:hawkinslj1980@yahoo.com)

Subject Line: SDG&E Master Permit-DEIR/DEIS Comments

Attn: Lisa Orsaba, CPUC Project Manager  
Attn: Will Metz, Forest Supervisor, Cleveland National Forest

I support SDG&E proposed power line replacement project for upgrading existing 69KV and 12KV electric lines with fire resistance poles and lines. I object to the Federal proposed action to relocate power lines (TL626). I furthermore, object to the additional alternative of removal of TL626 from service.

These power lines have provided public utilities to the Boulder Creek area of Julian since the 1940's. Removal or relocating existing lines is an unnecessary inconvenience and costly proposal. Any change to the existing lines could negatively affect access to electricity for necessary lights, power, and water wells. The federal proposed action to relocate power lines and the additional alternative to remove TL626 from service adversely affects the agricultural businesses and citizens of the area.

Please precede with SDG&E proposed line replacement projects for improved fire resistant poles and lines and don't interfere with private property rights. This current infrastructure serves our back country areas from Descanso/Alpine to Julian/Santa Ysabel. It is valuable resource that we don't want changed. I am also concerned as to why this major change to the community was not brought before our local planning group. Please confirm receipt of this email.

Sincerely,

Jeanine Hawkins

**GERALD W. FISHER**

23550 Hwy. 76 Santa Ysabel, CA 92070•Phone 760-782-9208•Fax 760-782-0824•jfisher760@aol.com

October 31, 2014

To: Lisa Orsaba, California Utilities Commission  
Will Metz, United States Forest Supervisor, Cleveland National Forest

c/o Rica Nitka  
Dudek Office  
605 Third Street  
Encinitas, CA 92024

Re: MSUP and PTC Power Line Replacement Projects Draft EIR/EIS, TL682  
23550 Hwy. 76, Santa Ysabel, CA 92070

Ladies and Gentlemen,

My apologies, the hand delivered first comments letter yesterday was not dated. Thanks to the graciousness of Rica Nitka that should be taken care of. Her knowledge also challenged my thinking – so a few more areas need help.

Q: Isn't the protection of Life the highest priority of USFS Firefighters?

Q: If not, what are the top 3, in order?

Q: Because of the State supported/controlled monopoly, what is the return, over their cost, that Gas & Electric Utilities are allowed?

Q: What is the "not to exceed" return that the CPUC uses to protect the ratepayer?

Q: Isn't the protection of the lives of utility workers the highest priority of SDG&E?

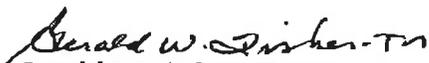
Q: If not, what are the top 3, in order?

The '07 Fires created a "cost" of 500 million+ that included many lives in the public sector. Q: Is it the process of the CPUC in comparing alternatives that a possible cost of 600 million+ to underground the 'at risk' East San Diego County electrical lines would be too expensive compared to the proposed pole replacement?

Rule 95 of the CPUC provides "discretion" for the Utility to protect above ground wires to the extent they can go many times – 100's of feet – further than the contracted easement. Q: If undergrounding eliminates this inequity, plus eliminates the fire danger and exposure to death by fire, what alternatives would the CPUC propose?

Q: What would the CPUC's rationale be for each one of the above alternatives?

Respectfully submitted,

  
Gerald W. Fisher, Trustee

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:49 AM

To: CNFMSUP

Subject: Sdg&e master permit comments

Comments in response to DR6 and the Master Permit.

SDG&E has proposed two options to make up for the proposed removal of TL626. In regards to Option A, which involves new larger wires and metal poles on TL6931 from the Crestwood substation to the Boulevard substation, this plan has been proposed and permits applied for in past years and is logical since the master plan fire hardening/upgrade only goes as far east along TL629 as the Crestwood substation. I feel certain TL6931 between Crestwood and Boulevard substations will eventually receive the metal poles and larger wires regardless of the future status of TL626.

In regards to Option B, SDG&E proposes construction of a 3 mile 69 kv line from the Suncrest substation to Japatul Road to tie into TL625b, the Barrett-Loveland 69 kv line. The SDG&E proposal is entirely on CNF lands across several huge canyons. The same result can be accomplished much easier than a new 69 kv line across rugged CNF lands. Bell Bluff Road, which links Japatul Valley Road to the Suncrest substation is almost entirely controlled and maintained by SDG&E. SDG&E secured easement and access along this road as part of the Sunrise Powerlink construction. A 69 kv line (TL625) and a 12 kv line is located at the entrance to Bell Bluff Road at Japatul Valley Road. (see image). When SDG&E build the Suncrest

substation, they ran a 12kv line from the existing poles along Bell Bluff Road and Japatul Valley Road all the way to the Suncrest substation. SDG&E built the 12kv line under Bell Bluff Road. I have enclosed images of the vault access points along Bell Bluff Road. I also enclosed Google Earth images showing 12kv vaults along Bell Bluff Road. SDG&E can use the existing 12kv conduits and vaults under Bell Bluff Road for a 69 kv tie in to TL625. If SDG&E cannot use the existing infrastructure under Bell Bluff Road, SDG&E can construct a new 69kv above or below ground along Bell Bluff Road to Japatul Valley Road that is shorter than DR6 proposes and accomplishes the mission without new construction on CNF lands. I would also like to point out that since Bell Bluff Road is not a county road and SDG&E has access and easements to everything along this road, construction of a powerline along this road does not have any of the issues construction elsewhere in San Diego County would have. Using Bell Bluff Road, SDG&E can tie the Suncrest substation to TL625 almost entirely on lands they already control. As part of this comment, please perform an official data request procedure on construction of an under ground 69kv powerline to link Suncrest substation to TL625 along Bell Bluff Road.

Pictures supporting this comment letter will be named Suncrest.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:52 AM

To: CNFMSUP

Subject: Sdg&e master permit

Attachments: Screenshot\_2014-07-14-20-59-54.png

Bell Bluff Road showing underground 12 kv (white squares) headed towards Suncrest Substation.

Sent from my Verizon Wireless 4G LTE smartphone



4G



81%



8:59 PM



(c) 2014 INEGI





From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:53 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: Screenshot\_2014-07-14-20-59-31.png

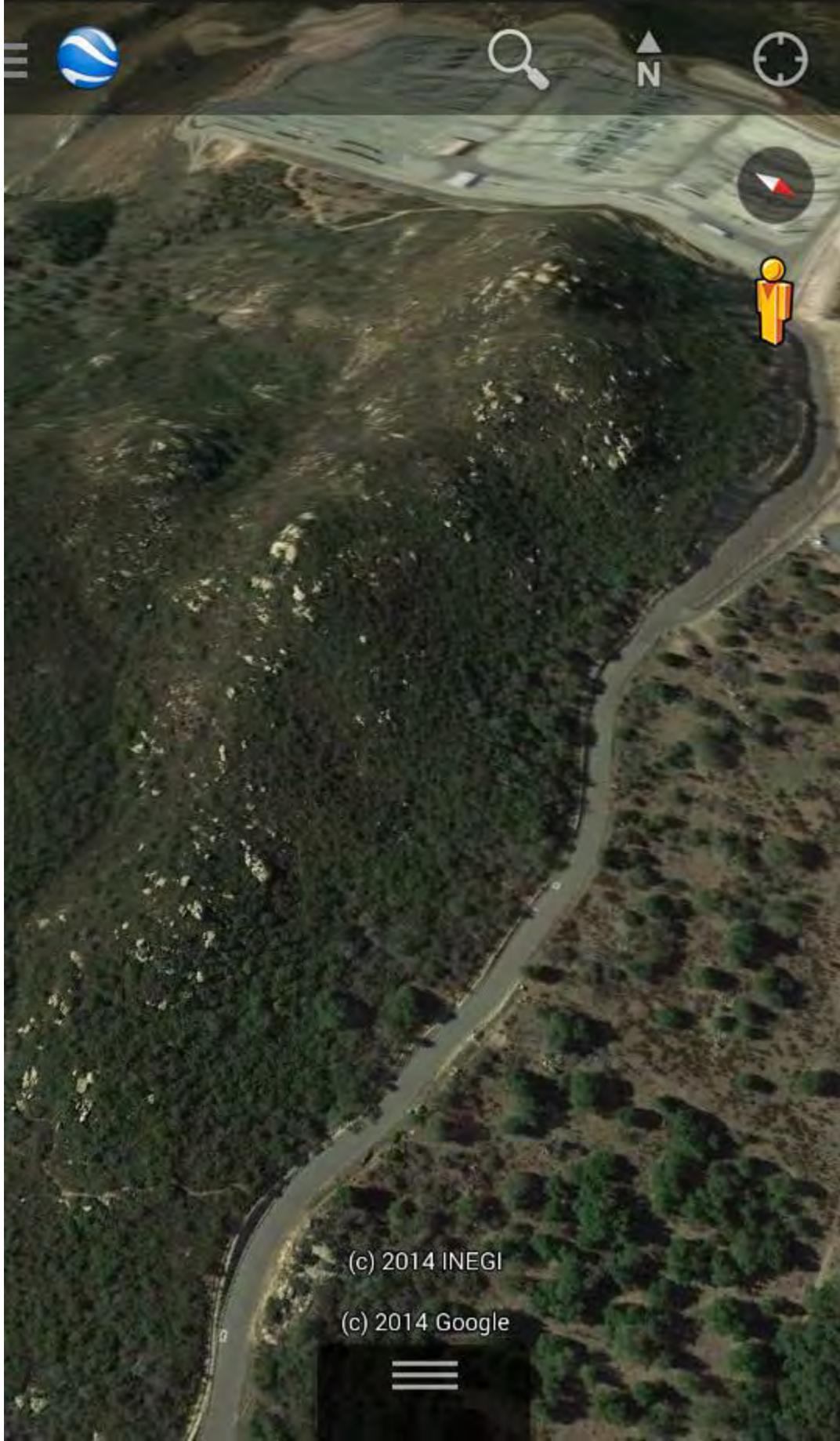
Suncrest Substation and Bell Bluff Road showing current 12kv under ground condition.

Sent from my Verizon Wireless 4G LTE smartphone



(c) 2014 INEGI

(c) 2014 Google



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:59 AM

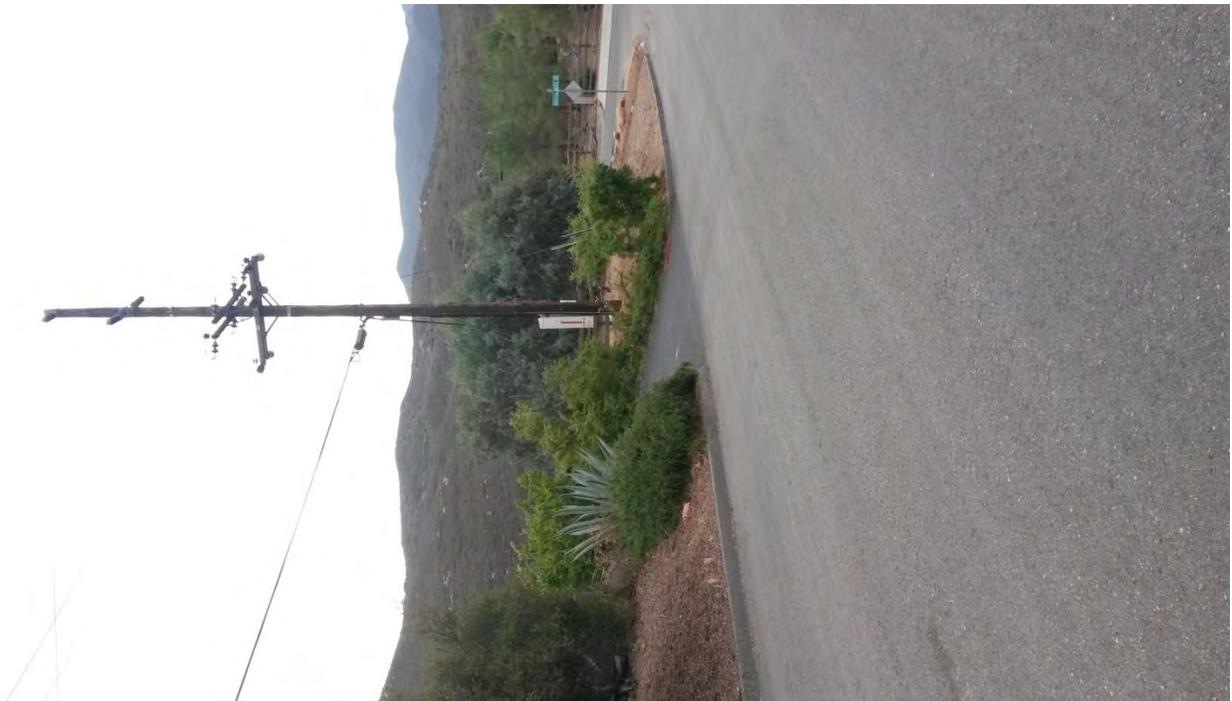
To: CNFMSUP

Subject:Sdg&e Master permit comments

Attachments: 20140714\_084151.jpg

Bell Bluff road and Japatul. Image shows TL625.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:00 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: 20140714\_180840.jpg

Current state 12kv underground on Bell Bluff Road

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:01 AM

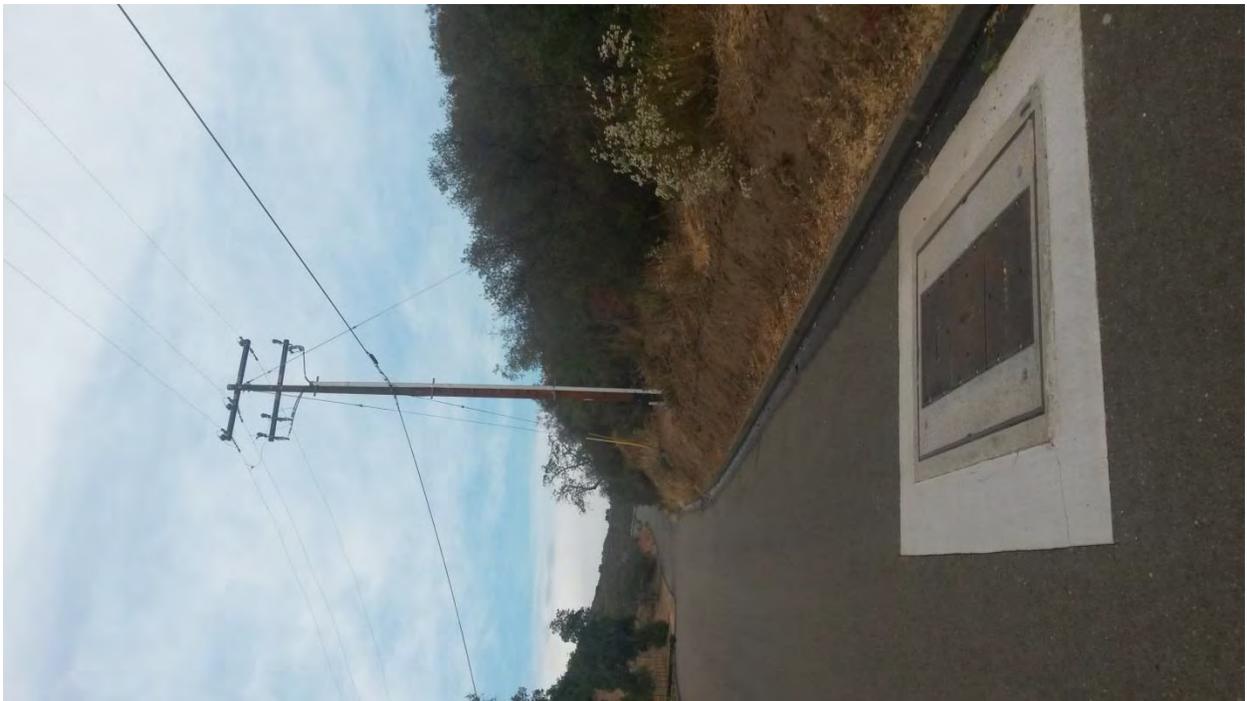
To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: 20140714\_180835.jpg

Bell Bluff Road transition from above ground to underground.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:40 AM

To: CNFMSUP

Subject: Sdg&e master permit comments

Attachments: 20140714\_182113.jpg

TL625 and Sunrise intersection looking north towards Suncrest Substation. Proposed location of new powerline in alternatives.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:55 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

In regards to the permit section that discusses the road removal plan. A map overview of all road sections removed should be included for public comment before Master Plan moves forward.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:45 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Master plan comments relating to slope on access roads. The proposed master plan removes all access roads with a slope greater than 25% grade. Please lower the slope grade removal criteria to 20%. The picture comments of erosion damage show damage caused by rainfall on roads with 22% grade on TL626. Note 1 foot deep ruts in road graded less than one year ago. Ideally, grade restrictions should be 15% as required on the Sunrise Powerlink and San Diego County rules. The access roads that will remain in service after the Master Permit process is complete will be in use for a minimum of 25 years and probably forever. There is no better time to correct the road issue than right now in the master permit process. 15% grade criteria cannot be met throughout the CNF, please work on a compromise that allows easement roads to reach max grade at 20%.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 3:51 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: 20141031\_172322.jpg

TL626 access road at approximately 22% grade. Under current master plan proposal, this road section would remain in service. This data shows 25% max grade criteria needs to be lowered to at least 20% grade in the CNF master permit area.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:10 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: Screenshot\_2014-04-30-10-14-55.png

Please include this image and update all my comments regarding

Maximum wind speed on TL626 and D79 in the CNF master permit process. Maximum recorded wind speed on TL626/D79 is now 101 mph.

The current master permit proposal rebuilds D79 to 85mph max wind speed rating. The data in this image shows a new max wind speed on this line at 101mph. Please modify D79 to an underground powerline in areas with wind speeds higher than the new proposed D79 wind speed capacity. Please explain "Shall Not Fail" rules under rule 95, cpuc guidelines, and the public safety effects and emergency plans in regards to the proposal to build a powerline (D79) to a standard of 85mph in a 101 mph area. I do not understand the logic, legality, and liability of building a powerline above ground to a max wind speed rating almost 16% below maximum recorded wind speed for the area.

Sent from my Verizon Wireless 4G LTE smartphone





From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:15 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: Screenshot\_2014-04-30-10-15-19.png

Please include this image and update all my comments regarding

Maximum wind speed on TL626 and D79 in the CNF master permit process. Maximum recorded wind speed on TL626/D79 is now 101 mph. Please update the master permit documents to reflect the max windspeed recorded in the permit area.

Sent from my Verizon Wireless 4G LTE smartphone



89%

10:15 AM

www.sdgeweather.com/station.php?s:



ImpactWeather

All Stations Radio Satellite Rainfall Station Map Enhanced Site

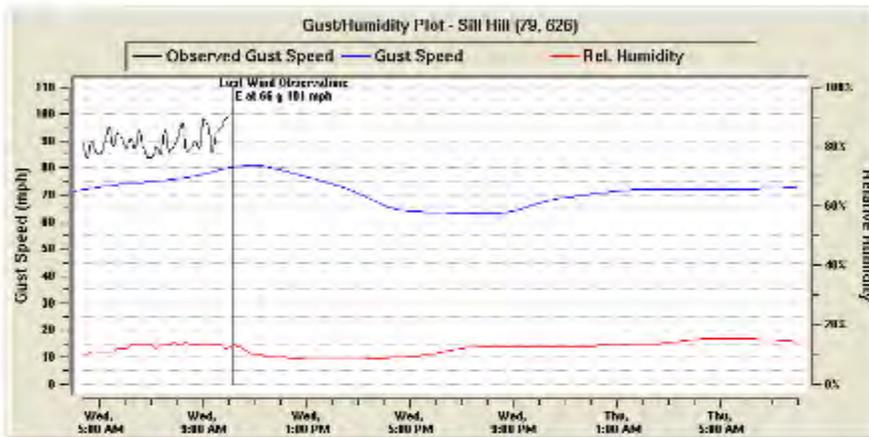
Observations: Wind Gusts Humidity Temperature

Forecasts: Wind Gusts Humidity Temperature

Sill Hill (79, 026) Station Data (Station Map)

Red Flag Warning: No  
Fire Weather Zone: 256  
SDGE Region: Mountain Empire  
Lat/Lon: 32.954/-116.643

Observations



| Time (PDT)   | Wind Spd/Gust | Temp | RH  | Fuel Moisture |
|--------------|---------------|------|-----|---------------|
| 4/30 10:10am | E 66 G 101    | 50°  | 13% | -             |
| 4/30 9:50am  | E 67 G 98     | 50°  | 12% | -             |
| 4/30 9:40am  | E 67 G 93     | 50°  | 13% | -             |
| 4/30 9:30am  | E 66 G 93     | 50°  | 13% | -             |
| 4/30 9:20am  | E 61 G 86     | 50°  | 13% | -             |
| 4/30 9:10am  | E 65 G 90     | 50°  | 13% | -             |
| 4/30 9:00am  | E 64 G 98     | 50°  | 13% | -             |
| 4/30 8:50am  | E 65 G 87     | 50°  | 13% | -             |
| 4/30 8:40am  | E 68 G 90     | 50°  | 13% | -             |
| 4/30 8:30am  | E 66 G 87     | 50°  | 13% | -             |
| 4/30 8:20am  | E 63 G 86     | 50°  | 14% | -             |
| 4/30 8:10am  | E 67 G 97     | 50°  | 13% | -             |
| 4/30 8:00am  | E 66 G 91     | 50°  | 13% | -             |
| 4/30 7:50am  | E 65 G 88     | 50°  | 14% | -             |
| 4/30 7:40am  | E 63 G 86     | 50°  | 13% | -             |
| 4/30 7:30am  | E 66 G 94     | 50°  | 13% | -             |
| 4/30 7:20am  | E 66 G 83     | 50°  | 13% | -             |
| 4/30 7:10am  | E 63 G 88     | 60°  | 12% | -             |
| 4/30 7:00am  | E 62 G 84     | 60°  | 13% | -             |
| 4/30 6:50am  | E 67 G 84     | 60°  | 13% | -             |
| 4/30 6:40am  | E 64 G 88     | 59°  | 13% | -             |
| 4/30 6:30am  | E 67 G 84     | 60°  | 13% | -             |
| 4/30 6:20am  | E 64 G 87     | 60°  | 13% | -             |
| 4/30 6:10am  | E 64 G 91     | 60°  | 13% | -             |
| 4/30 6:00am  | E 65 G 87     | 60°  | 12% | -             |
| 4/30 5:50am  | E 67 G 91     | 61°  | 12% | -             |
| 4/30 5:40am  | E 66 G 93     | 61°  | 12% | -             |
| 4/30 5:30am  | E 64 G 88     | 61°  | 13% | -             |
| 4/30 5:20am  | E 68 G 93     | 61°  | 13% | -             |
| 4/30 5:10am  | E 65 G 89     | 61°  | 11% | -             |
| 4/30 5:00am  | E 61 G 85     | 61°  | 13% | -             |
| 4/30 4:50am  | E 62 G 80     | 61°  | 13% | -             |
| 4/30 4:40am  | E 66 G 90     | 62°  | 13% | -             |
| 4/30 4:30am  | E 67 G 84     | 62°  | 10% | -             |
| 4/30 4:20am  | E 61 G 88     | 63°  | 10% | -             |
| 4/30 4:10am  | E 67 G 88     | 63°  | 10% | -             |

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:24 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please modify the master permit to include language stating SDG&E will assume 100% liability for any fire and damages in the CNF and adjacent lands that is a result of rebuilding powerline infrastructure to a max wind speed rating which is less than documented maximum wind speed for the permit area. For example, a fire resulting from a powerline issue at 90mph would be 100% SDG&E fault as the powerline was rebuilt to an 85 mph standard which is below maximum documented wind speed.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:55 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

I noticed in the Master Permit draft that pesticides and herbicides are prohibited along the cottonwood creek drainage. I also noticed in the Master Permit draft, pesticides herbicides are allowed everywhere else on CNF lands. The issue of pesticide and herbicide use and stopping there usage by SDG&E in the CNF should be addressed for the whole CNF. Please include language in the Master Permit that prohibits pesticide and herbicide usage in the entire CNF by SDG&E and all of its contractors. If a total ban on pesticides and herbicides cannot be negotiated, please address pesticide and herbicide usage in all areas of the CNF with significant streams, water features, rare or endangered species, etc.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:57 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please modify the master permit document to include a plan for power pole removal along the remove from service section of TL626 and the power line going up the west side of Cuyamaca Peak. Please include language that requires old poles be removed to a below grade condition with no visible wood. Current practice of chain sawing off old poles and leaving several inches to a foot of old pole sticking out of the ground is unacceptable on CNF lands being restored after power line removal.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:58 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please add language to the master permit to require sdg&e to contribute to the maintenance of Boulder Creek road and other county dirt roads used for construction access during and after construction.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 4:59 PM

To: CNFMSUP

Subject:SDG&E Master Permit comments

In regards to all access and easement roads associated with and maintained by SDG&E for powerlines on CNF lands as covered in the proposed master permit. Please survey and measure all road slopes in terms of percent grade as would be needed to implement road erosion control plans in the master permit

document. It is my understanding, that no formal measurement or survey exists and that for the purpose

of the master permit process, slope estimates were made by using topo map contour features. If necessary, please use a the Data Request process to accomplish the slope measurement of all roads covered by the master permit. Please measure the slope of all roads at a reasonable minimum distance (20 foot)and at the highest level of slope for each down hill section.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:02 PM

To: CNFMSUP

Subject:SDG&E master permit comments

The master permit document states easement roads will be maintained with a 10 year durability in mind. Please include additional language in permit to require road removal in areas where road grade is below the removal target percent grade criteria, but high rainfall is causing continuous erosion problems. For example, if easement road requires regrading every year for three consecutive years, then a CNF erosion stop action initiates and road is targeted for removal.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:03 PM

To: CNFMSUP

Subject:SDG&E master permit comments

As condition of the master permit, please add language that requires any new construction on CNF lands for the duration of the permit to be mitigated by a factor double the amount of land acerage that it is now standard. Require all mitigation land purchases be in the district of the CNF in contention for a project.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:03 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please amend the master permit to include non-expansion language. First, please make a condition of approval that SDG&E will not add any additional powerlines in the national Forest covered by the master permit.(this includes adding a second circuit to permitted lines) Second, please add language to prohibit voltage increases anywhere in the National Forest for the duration of the permit. Third please prohibit substation construction any where along an easement of a powerline in the permit area. Finally, prohibit any new construction of roads in the permit area. If these conditions cannot be agreed upon, include language that requires all future powerline construction or rebuilding be done in an underground configuration.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:04 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

In regards to all access and easement roads associated with and maintained by SDG&E for powerlines on CNF lands as covered in the proposed master permit. Please survey and measure all road slopes in terms of percent grade as would be needed to implement road erosion control plans in the master permit

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Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:08 PM

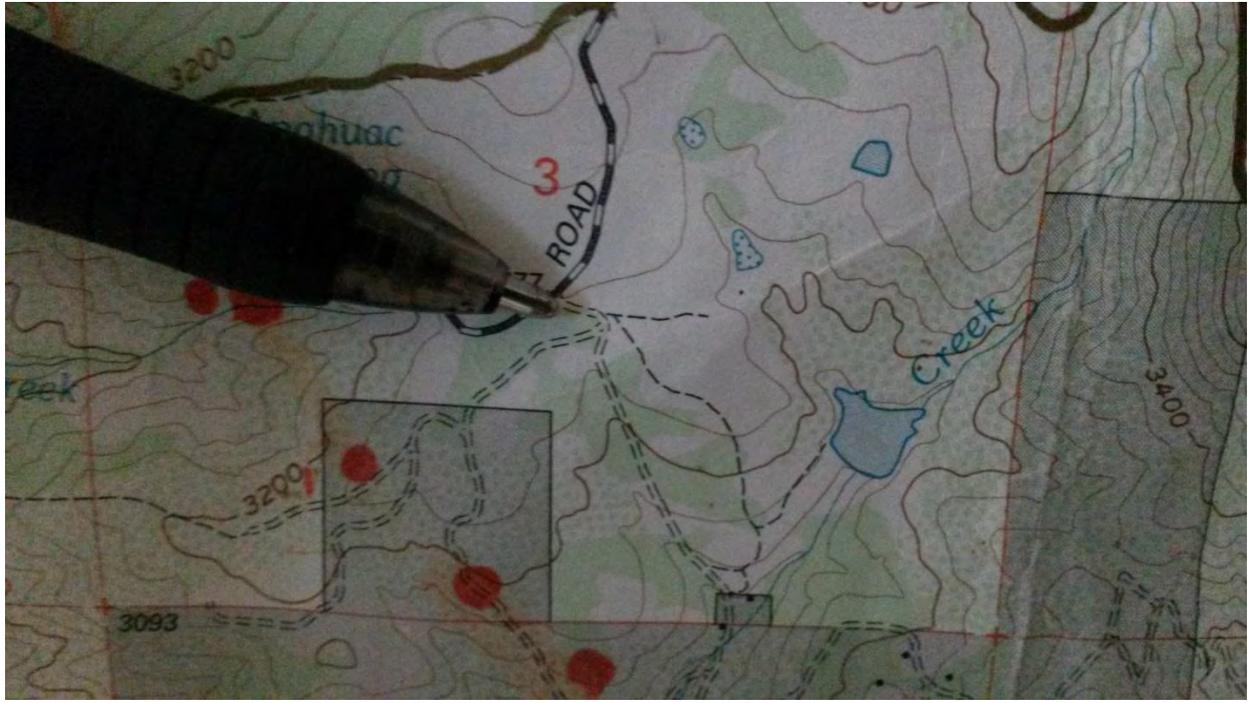
To: CNFMSUP

Subject: Sdg&e Master permit comments

Attachments: 20141102\_090555.jpg

Pen points to intersection of Boulder Creek Road and McCoy Ranch Road (pvt) in the Palomar District. The two roads shown headed south from the pen tip are used by both private property owners and for SDG&E access roads. Please included in the master permit road control issue for this area. A gate and barriers need to be added at the intersection of Boulder Creek Road and McCoy ranch road. A small parking circle near the road intersection could be included. The two access roads are a constant traffic stream of vehicles looking for a new place to drive. People have illegal campfires out of public view along these access roads. Although these two roads are SDG&E access, they do not maintain them and local residents do all the upkeep. Meanwhile, every jeep has to drive the muddy road in the winter and turn around and drive out. Residents are constantly fixing fences in this area to keep people from driving out into the meadow. Please respect the local landowners and gate these private roads/SDG&E access roads. Please provide the owner's of the properties that use these roads with keys.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:09 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please amend the master permit to include non-expansion language. First, please make a condition of approval that SDG&E will not add any additional powerlines in the National Forest covered by the master permit. Second, please add language to prohibit voltage increases anywhere in the National Forest for the duration of the permit. Third please prohibit substation construction anywhere along an easement of a powerline in the permit area. Finally, prohibit any new construction of roads in the permit area.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:09 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

I support the federal proposal to remove TL626 from service. However, rebuilding D79 in an above ground configuration in an area with a wind speed rating of 85mph is not acceptable. D79 should be placed underground along the length of Boulder Creek road. Keep in mind, undergrounding a 12kv line is much simpler and cheaper to install than a 69kv line. If undergrounding the entire length of D79 cannot be accomplished, Specific attention in the interest of public safety needs to be made to the sections experiencing the highest wind speed and the most fire danger. At a minimum, D79 for 1200 feet either side of the Sill Hill weather station should be placed under ground and the section crossing the Boulder Creek gorge as well. The entire length of D79 should be evaluated for undergrounding for the purpose of public safety. Please perform a data request process to evaluate undergrounding D79 as a complete powerline and in short 1100 foot sections in the most dangerous and scenic areas.(1100 feet I believe is the maximum distance 12kv can go without a vault. If 1100 feet is not correct, please modify this comment to substitute the max value in feet instead of 1100)

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:10 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

In regards to all access and easement roads associated with and maintained by SDG&E for powerlines on CNF lands as covered in the proposed master permit. Please survey and measure all road slopes in terms of percent grade as would be needed to implement road erosion control plans in the master permit

document. It is my understanding, that no formal measurement or survey exists and that for the purpose

of the master permit process, slope estimates were made by using topo map contour features. If necessary, please use a the Data Request process to accomplish the slope measurement of all roads covered by the master permit. Please measure the slope of all roads at a reasonable minimum distance (20 foot)and at the highest level of slope for each down hill section.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:11 PM

To: CNFMSUP

Subject: Sdg&e master permit comments

After roads are serviced and maintained as discussed in the master permit, please have qualified professionals inspect the work to assure all criteria is met. Please use forest staff or other non - SDG&E employees to ensure road maintenance meets master permit standards.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:12 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Relating to road removal in the master permit document. I don't see in the master plan what the actual plan is, or how they will re-plant any of the the old roas areas. I do not see a plan to monitor and correct if needed the restoration if it didn't work several years later.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:18 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Master plan should make public all new gates and barriers for public review and comment before Master Plan moves forward.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:20 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

In regards to the permit section that discusses the road removal plan. A map overview of all road sections removed should be included for public comment before Master Plan moves forward.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:23 PM

To: CNFMSUP

Subject:SDG&E Master Permit Comments

Language in the master permit calls out for "qualified professionals" to evaluate the roads for slope, erosion, corrective actions. We need to know who these qualified professionals are, who pays them, how long and often they will be inspecting(I think its just once, should be made on a continual and annual basis before workers are allowed to grade). Aditonal language should be added to the permit requiring that all inspections be done on foot rather than from the seat of a wheeled vehicle or helicopter.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 5:52 PM

To: CNFMSUP

Subject: Sdg&e master permit comments

Attachments: 20140803\_150924-1.jpg

Same road section as shown in previous photo erosion comments. Please include this comment with those photo comments showing measurement of this road section.

Photo shows 22% percent grade on TL626/D79 access road during summer thunderstorm. Note water running down road and causing erosion issues. Road was maintained under BMP by SDG&E last year. Under current proposed master permit, this road section would meet standards. Every year this section would have to be graded to restore. The 25% grade limit is not acceptable. Please modify the master permit from 25% max grade to at least 20% max allowable grade.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 6:42 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Attachments: 20140224\_103306.jpg

TL626/D79 in current configuration. Note top three 69kv wires are subdued in color of wire. 12kv component (bottom two wires) are extremely bright in the sun. Scenic integrity of the 12kv wire is terrible. Please make sure the master permit has all size wires replaced with non-reflecting subdued color wires.

Sent from my Verizon Wireless 4G LTE smartphone



From: nweflen <nweflen@yahoo.com>

Sent: Monday, November 03, 2014 6:51 PM

To: CNFMSUP

Subject: Sdg&e master permit comments

Attachments: 20140224\_092137-1.jpg

Please include this photo in the series of comments regarding erosion along a 22% grade section of TL626/D79. This picture shows 22% grade section as graded on 2-24-14.

Sent from my Verizon Wireless 4G LTE smartphone



---

**From:** Maegan Martin <maegan.martin33@gmail.com>  
**Sent:** Monday, November 03, 2014 8:32 AM  
**To:** CNFMSUP  
**Subject:** Re: My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our

My name is Maegan McCoy (Martin). I had previously submitted comments regarding the Master Special Use Permit and Permit to Construct Powerline Replacement Projects in Orange and San Diego Counties, California, to identify my standing and express my interests and concerns regarding the project. My comments pertain to TL626 and D79, the portion of the proposed project that runs near Boulder Creek Road and affects my family's property. I wish to provide these additional comments to reference my interests and concerns regarding the proposed project relative to specific language and alternatives within the draft Environmental Impact Review/Environmental Impact Statement (EIS).

I had previously stated support for maintaining the existing power grid within the region and to my family's property. However, an important component of my previous comments was also to express opposition to replacement of existing power lines on my family's land involving any new structures that compromise the aesthetic, environmental, or other values of the property. The EIS states that the proposed action for TL626 would be to "replace existing wood poles (40-90 feet in height) with weathered steel poles (max height 110 feet)". I would consider this action of powerline replacement using poles of increased heights to be invasive to the property, and therefore do not support the proposed action of the permit applicant (SDG&E) as currently written. My desire to avoid replacement of existing powerlines with larger and more invasive structures would be consistent with the No Project Alternative (maintaining the status quo), the Environmentally Superior Alternative under the California Environmental Quality Act (excluding TL626, replacing some 69 kV lines with 12 kV), or Forest Service Proposed Action Option 3 (partial underground relocation in Boulder Creek Road).

Finally, I wanted to address the question about the right of way (ROW) for powerlines on private lands. The EIS appears to indicate that all powerline replacement will be conducted within existing ROWs, and that expanded ROWs will not be needed where powerlines will follow existing alignments. However, the EIS also states that "outside the CNF, existing ROWs have varying widths based on individual property agreements". We are currently unaware of the specific terms of the ROW through my family's land, as the person who has been the primary caretaker of the property, Mr. David McCoy (my father), is recently deceased. I therefore request that you re-initiate direct coordination with the McCoy family to clarify the terms and status of any existing ROW, lease, or easement through the property, and how the proposed action would affect that ROW and any property agreements. I also request that you keep me informed regarding any future proposed actions of this project involving the Boulder Creek Road area and TL626 and D79.

Thank you for your consideration and the opportunity to comment.

Maegan McCoy (Martin)

(505)803-8048

[Maegan.martin33@gmail.com](mailto:maegan.martin33@gmail.com)

Charles McCoy Trust

APN 333-061-02-00

APN 333-040-03-00

APN 333-070-01-00

On Thu, Oct 30, 2014 at 12:41 PM, Maegan Martin <[maegan.martin33@gmail.com](mailto:maegan.martin33@gmail.com)> wrote:

My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our land for 74 years. This land has been in my family since the late 1800's. My ancestors were some of the original Julian Pioneers. Our land as well as our family depends on having electricity. I am opposed to any changes made by SDG&E that will end in the removal of our power lines. Removing the electrical lines would devastate our family as well as our way of life. I understand that upgrades being made to the current electrical lines will better insure the safety of us all out here against fires. I am not opposed to the upgrades; however I want to make it very clear that these upgrades will not be any more invasive to our property than it has been in the past. All upgrades need to remain in the same position on the same grid. I have heard mention of the idea that all power be removed do to the "wilderness" area that surrounds our private property. I see no reason why we would remove something that has been a part of our life for seventy plus years. Electrical grids contribute to not only our everyday way of life but the value of our property as well.

Maegan McCoy (Martin)

[505-803-8048](tel:505-803-8048)

[Maegan.martin33@gmail.com](mailto:Maegan.martin33@gmail.com)

On Thu, Oct 30, 2014 at 12:05 PM, CNFMSUP <[CNFMSUP@dudek.com](mailto:CNFMSUP@dudek.com)> wrote:

Hi Maegan,

Would you mind resending this message with your comment in the body of an email? There are character restrictions on the subject field so unfortunately the full content of your message isn't coming through.

Thanks.

**From:** Maegan Martin [mailto:[maegan.martin33@gmail.com](mailto:maegan.martin33@gmail.com)]

**Sent:** Wednesday, October 29, 2014 10:24 AM

**To:** CNFMSUP

**Subject:** My name is Maegan McCoy (Martin). I am the daughter of David McCoy and the grandchild of Charles E. McCoy. I am the fifth generation to have grown up on our ranch. The McCoy ranch is located at 15787 Boulder Creek Road. We have had electricity on our l...



2014 NOV 4

S.D.G.& E / POWER LINE REPLACEMENT 11-4-14 *St*  
~~11 OCT 30 11 21 12~~

To: California Public Utilities Commission // 505 Van Ness Ave., San Francisco, CA 94102  
United States Forest Service // 18945 Rancho Bernardo Rd., San Diego, CA 92127

Re: San Diego Gas and Electric Company Master Permit Special Use and permit to Construct Metal Power Pole Replacements on existing lines Projects No. A. 12-10-009  
Subject: SDG&E Master Permit – DEIR/DEIS COMMENTS.doc

Dear CPUC Commissioners and FS Supervisor Will Metz,

Please add this supplemental letter to our previous letters of concern on SEMPRA, SDGE Projects No. A.12-10-009

SDG&E MASTER SPECIAL USE PERMIT TO CONSTRUCT POWER LINE REPLACEMENT PROJECTS EIR/EIS IN THE FEDERAL REGISTER VOL. 78, NO. 184 OF SEPTEMBER 23, 2013 STATES “ THE FOREST SERVICE PROPOSED ACTION IS DESIGNED TO BE CONSISTENT WITH THE LMP REQUIREMENTS.”

CONCERNING THE LAND USE ISSUE OF COMPATIBILITY, WITH THE L.M.P.'S FOREST-SPECIFIC DESIGN CRITERIA STATED IN CNF §6, “ UNDERGROUND NEW 33 KV AND UNDER ( WHICH INCLUDES ALL 12 KV ) POWER LINES WHEREVER POSSIBLE. “ *S-6*

WILL THE 20 OR SO PRIVATE LAND HOMES ON THE THREE BLOCKS OF MOUNT LAGUNA DRIVE AND MOUNT LAGUNA PLACE, BE UNDERGROUNDED?

“NEW” IS DIFFERENT FROM REPLACE. THE COST OF REPLACE SHOULD BE MORE THAN NEW. REPLACE INCLUDES REMOVING THE OLD. HERE IS A GOLDEN OPPORTUNITY TO MAKE THINGS BETTER.

ONE BLOCK IS WEST OF SUNRISE HIGHWAY, ONE BLOCK IS EAST AND THERE IS ALSO ONE CULDESAC BLOCK THAT LEADS SOUTH. THE SCENIC INTEGRITY/VISUAL IMPACT OF THE OVERHEAD 12KV LINE WHICH CROSSES OVER SUNRISE HIGHWAY IS APPARENT WHILE WALKING FOUR BLOCK TO & FROM BURNT RANCHERIA CAMPGROUND TO & FROM THE STORE, POST OFFICE AND VISITOR'S CENTER. THE CAMPGROUND WITHIN THE C.N.F. HAS 123 SITES FOR INDIVIDUAL OR FAMILY CAMPING.

SUNRISE HIGHWAY IS A NATIONAL SCENIC BYWAY ENJOYED BY MANY LOCALS AND MORE VISITORS.

-----  
BY THE WAY, AMPACITY IS A PORTMANTEAU. ONE WORD FROM TWO. (AMPERE CAPACITY)

SDG&E CHART SHOWS “ROOK'S” AMPACITY AT 1,158 FOR 100 DEGREES FAHRENHEIT ( 37.8 C )  
THE MANUFACTURER SHOWS AMPACITY AT 1,444 FOR 392 DEGREES FAHRENHEIT ( 200 C )  
THE MANUFACTURER SAYS “WITHOUT LOSS OF STRENGTH” FOR 482 DEGREES FAHRENHEIT ( 250 C )

REFERENCING DATA REQUEST #4, SDG&E'S RESPONSE: PAGE 7 OF 23, SHOWS THE NEW 69KV LINE WILL HAVE AN AMPACITY OF 1,158 COMPARED TO THE OLD 69KV LINE OF AN AMPACITY OF 270 .

THE INCREASE IN AMPACITY IS 4.2888 TIMES. SO, WHEN THERE ARE THREE LINES ON THE 69KV POLES THEN EACH LINE HAS 23KV.

- .  $69KV / 3 = 23KV$  PER LINE PER POLE
- . (  $3 \times 23KV = 69KV$  OLD CAPACITY PER 69KV POLE )
- . (  $4.2888 \times 1 \times 23KV = 98KV$  NEW CAPACITY PER LINE )
- . (  $4.2888 \times 3 \times 23KV = 296KV$  NEW CAPACITY PER 69KV POLE )

SDG&E SAYS THEY WANT TO USE THIS SAME LINE FOR THE 12KV CIRCUITS. THEY PLAN TO USE 2 TO 4 LINES PER POLE

- . (  $4.2888 \times 2 \times 98KV = 197KV$  NEW CAPACITY PER 2 LINE 12KV POLE )
- . (  $4.2888 \times 4 \times 98KV = 394KV$  NEW CAPACITY PER 4 LINE 12KV POLE )

WITH THE NEW HIGHER AMPACITY LINE, THE ONLY THING STOPPING THE HIGHER FLOW OF VOLTAGE IS THE SUB-STATIONS' CAPABILITY AND SDG&E SAYS THE AUTHORIZATION OF THE CPUC AND CAISO. I WOULD THINK THAT C.N.F. AND THE FEDERAL GOVERNMENT MIGHT HAVE SOME SAY IN THE MATTER.

I BELIEVE THE AMPACITY OF THE NEW LINE IS THE PROBLEM. THE AMPACITY INCREASE COMES FROM THE INCREASE IN DIAMETER OF THE NEW LINE COMPARED TO THE OLD LINE.

THE NEW LINE IS 0.977 INCHES IN DIAMETER (ROCK FROM SOUTHWIRE )  
THE OLD LINE MUST HAVE BEEN LESS THAN HALF OF THAT, SAY 0.480

SO ENOUGH OF THE MATH LET'S GET BACK TO THE PROBLEM AT HAND

WE NEED A NEW CONDUCTOR WITH AMPACITY OF 270. THE SAME AMPACITY OF THE OLD 69KV LINE. WE ALSO NEED A NEW CONDUCTOR FOR THE 12KV LINE WITH THE AMPACITY OF THE OLD 12KV LINE.

SO LET'S TALK TO ALL THE ELECTRIC COMPANIES IN CALIFORNIA BESIDES SDG&E AND FIND OUT WHAT CONDUCTOR THEY ARE USING IN FORESTED LANDS THAT COMPLIES WITH ORDER 95.

LET'S ALSO TALK WITH THE DEPARTMENT OF ENERGY TO HELP WITH THE SOLUTION.

LET'S ALSO TALK WITH THE OTHER 49 STATES OR AT LEAST THEIR NATIONAL FOREST PEOPLE.

THERE MUST BE A 270 AMPACITY LINE FOR 69KV THAT WILL QUALIFY TO BE USED IN THE FOREST.

LASTLY, THE C.N.F. COULD PUT IN A "FUSE STATION" ON EACH LINE. IF AMPS ARE TOO HIGH TURN OFF.

---

SDG&E HAS STATED THAT WITHIN THE C.N.F. THE 69KV LINES HAVE A 30 FOOT EASEMENT.  
SDG&E HAS STATED THAT WITHIN THE C.N.F. THE 12KV LINES HAVE A 20 FOOT EASEMENT.  
SDG&E HAS STATED TO US THAT "THE ANALYSIS DOES NOT HAVE INFORMATION ON  
ANTICIPATED EASEMENT NEEDS FOR PRIVATE LAND". SAN DIEGO COUNTY HAS THAT INFORMATION.

THEREFORE, SDG&E SHOULD NOT USE 10 FEET OR 12 FEET CROSS-BARS ON THEIR 12KV POLES  
THAT RUN THRU THE PRIVATE LAND ON THEIR EXISTING 4 FOOT EASEMENT IN MOUNT LAGUNA.  
PLEASE SEE ATTACHED ROUTE MAP B-9 PAGE 35 OF 52 FOR C440. UNDERGROUND 3 BLOCKS.

---

CONCERNING INCREASING THE POLE HEIGHT, SDG&E SAYS IT IS NEED DUE TO ADDED CONDUCTOR  
SPACING. THEY PLAN TO MOVE THE LINES HORIZONTALLY ON A LONGER CROSS-ARM. ANOTHER WAY  
TO ADD CONDUCTOR SPACING IS SLIGHTLY VERTICAL BY ADDING A TALLER INSULATOR ON EVERY

OTHER LINE. LIKE PUTTING THE CONDUCTORS IN A " W " PATTERN ON A HORIZONTAL CROSS-ARM.  
THE " W " PATTERN USES THE EXISTING LENGTH CROSS-ARM BUT GIVES AN EXTRA 40% SPACING.

SDG&E SAYS ADD CONDUCTOR SPACING TO MINIMIZE CONDUCTOR GALLOPING/CLASHING.  
ADDED SPACING CAN LEADS TO AN INCREASE IN THE WIDTH OF AN EASEMENT.  
ESPECIALLY WHEN THE EXISTING EASEMENT ON MOUNT LAGUNA DRIVE IS 4 FEET.

SDG&E SAYS POLE HEIGHT INCREASE IS NEEDED TO PROPERLY MAINTAIN GROUND CLEARANCE.  
IF POLE HEIGHT INCREASE IS NEEDED FOR CONDUCTOR SAG THEN PUT THE POLES CLOSER TOGETHER.

---

PUBLIC SCOPING COMMENTS WERE RECEIVED AND RECORDED ON TABLE 2 SUMARY.  
PROJECT ALTERNATIVES – RECIEVED 8 COMMENTS ON UNDERGROUNDING.  
PROPERTY RIGHTS – RECEIVED 2 COMMENTS ON NOT INCREASING ELECTRICAL EASEMENTS.  
BIOLOGY – RECEIVED 1 COMMENT ON UTILITY TRUCKS NOT TO CRUSH TREE ROOTS.  
SCENIC INTEGRETU/VISUAL IMPACTS – RECEIVED 1COMMENT ON THE NATIONAL SCENIC BYWAY.  
HEALTH AND SAFETY – RECEIVED 1 COMMENT ON UNDERGROUNDING AVOIDS FIRE.  
HYDROLOGY – RECEIVED 1 COMMENT ON EXPLOSIVES DAMAGING WELL WATER.  
THE FOREST SERVICE'S ENTRY IN THE FEDERAL REGISTER VOL. 78 NO. 184 OF SEP 23, 2013  
PERMIT TO CONSTRUCT SAYS : "ADDITIONAL UNDERGROUNDING SHOULD BE EVALUATED AS PART OF  
THE MSUP REVIEW PROCESS" ; "CONSISTANT WITH THE CNF LAND MANAGEMENT PLAN ( CNF S-6 );  
"PERMITS ISSUED BY THE FOREST SERVICE ARE REQUIRED BY LAW TO BE CONSISTANT WITH THE LMP";  
"REPLACEMENT WOULD INCLUDE...UNDERGROUNDING".  
WHY DID THE ABOVE PUBLIC SCOPING COMMENTS NOT GET TO TABLE 3 "ISSUES TO BE ADDRESSED"?  
WHY WERE THESE ISSUES NOT MENTIONED IN 4.2 "ISSUES OUTSIDE THE SCOPE" ?

“UNDERGROUNDING” SHOULD BE ADDED TO THE “ENVIRONMENTAL ISSUE AREA” . ANIMALS ARE KNOWN TO LEAVE THE AREA WHERE ELECTRICAL TRANSMISSION AND DISTRIBUTION LINES TRAVEL. MAINTENANCE WORK WITH WORKERS, VEHICLES AND HELICOPTERS DISRUPT WILDLIFE.

TABLE 1, 2, 3 COMMENTS ON UNDERGROUNDING

ABOVE GROUND ELECTRIC LINES CAN BE MADE LESS LIKELY TO START FIRES BUT NOT ELIMINATE FIRES.

---

DOES SDG&E NEED FEDERAL PERMISSION TO INCREASE CONDUCTOR AMPACITY 4 TIMES IN NATIONAL FORESTS ?

THAT IS WHAT IS ABOUT TO HAPPEN ON THE 69KV CONDUCTORS. WORSE ON THE 12KV CONDUCTORS.

CONDUCTOR AMPACITY : EXISTING 69KV IS 270; NEW 69KV PLAN IS 1,158;

EXISTING 12KV IS ? NEW 12KV PLAN IS 1,158 .

---

CALIFORNIA PUBLIC UTILITIES NEEDS TO TAKE A STAND ON THIS ONE.

WE OBJECT TO THE ANSWERS THE SDG&E GAVE IN THE COMPLETE 02/15/13 RESPONSE TO THE CNF REVIEW 12/7/12 ON THE PERMIT 8.2 PESTICIDE APPLICATION :

“USE OF PESTICIDES FOR WHICH SDGE” SAYS ON PAGE 20 OF 43 THEY “MAY USE ONE OR MORE OF THE FOLLOWING INSECTICIDES”. LISTING, HIT SQUAD INDUSTRIAL INSECTICIDE OR BLAST EM. THEN GOING ON TO SAY THAT THEY MAY GO ON TO USE ONE OR MORE HERBICIDES DURING POLE BRUSHING, CUT-STOMP TREATMENTS ASSOCIATED WITH TREE REMOVAL , FOLLOWED BY PRODUCTS: RODEO, ROUNDUP, ROUNDUP PTO, ACCORD CONCENTRATE, GALLERY 75 DF, GARLON 3 ULTRA, LANDMARK XP, MILESTONE, PATHFINDER, PATHFINDER, STALKER, SPPA-26, AND OR DIMENSION ULTRA 40. THESE LINES THROUGH THE FOREST AND PRIVATE LANDS ARE GOING THROUGH CRITICAL HABITAT. THEY CLAIM PITIFUL MITIGATION ON ENDANGERED SPECIES THROUGHOUT THIS EIR/EIS. ESPECIALLY MOUNT LANGUNA SKIPPER BUTTERFLY HABITAT AREAS. NO WONDER ALL THE DEER AND WILDLIFE SEEM TO HAVE DISAPPEARED FROM THE BARRETT LAKE DRAINAGE AND MEADOWS DOWN IN THE SOUTH WEST CORNER OF CNF. WE MENTIONED THAT WHEN THEY PUT IN THE SDGE SUNRISE POWERLINK TRANSMISSION LINE, THE GROUPS OF DEER THAT COULD BE SEEN FROM JAPATUL VALLEY ROAD IN THE EARLY MORNING AND AT DUSK ARE NOW GONE. WE DON'T WANT THESE CHEMICALS ON OUR PRIVATE PROPERTIES, NOT ONLY HUMAN CONSUMPTION OF WELL WATER ENDS UP POLLUTED, BUT ANIMALS DIE. BARRETT RESERVOIR IS VITAL CITY OF SAN DIEGO EMERGENCY WATER SUPPLY. UP ON MOUNT LAGUNA THERE IS STUART WATER COMPANY SERVICING PRIVATE PROPERTIES. THE WILDLIFE ALSO USE THE SAME WATER THE CATTLE USE ON THE RANCH LANDS. WE OBJECT TO THE MAINTENANCE PRACTICES, ESPECIALLY ON CRITICAL HABITAT.

LOOK ON THE MAPS FOR MT. LAGUNA, MT. PALOMAR, CUYAMACA, AND ALL THE OTHER AREAS THEY COVER WITH CONSOLIDATING THESE PERMITS. WILDLIFE ARE SQUEEZED INTO THESE LAST HABITATS IN SAN DIEGO COUNTY. THIS IS THE LAST STAND FOR THEM. THE TREES THAT ARE LEFT IN THESE FORESTED LANDS ARE NEEDED TO SURVIVE FOR THE WILDLIFE, AND TO COUNTER GLOBAL WARMING. THEY ARE MORE VALUABLE NOW THAN EVER. THESE TREES ARE BREATHING IN CARBON DIOXIDE AND BREATHING OUT OXYGEN. SAN DIEGO'S 3 MILLION POPULATION NEEDS THIS RESOURCE FAR MORE, THAN ELECTRIC REPLACEMENT LINES, WITH FOUR TIMES THE AMPERAGE.

WE ARE OPPOSED TO THE PROJECT. REGARDING FAIRNESS, TO ALL PRIVATE PROPERTY OWNERS WITH PARCELS THAT HAVE ELECTRICAL UTILITY RIGHT-OF-WAYS, AND/OR FUTURE ONES. THEY HAVE NO WAY TO PROTEST DECISIONS MADE AFTER THIS POINT. IT HAS TOO MANY IMPACTS TO THE ENVIRONMENT THAT WE HAVE ALREADY WITNESSED WITH THE SUNRISE PROJECT THAT MAY BE IRREVOCABLE. WE KNOW TO SAY NO ALTERNATIVE IS NOT THE ANSWER TO FIRE IMPACTS FOR THE FOREST. BUT A DECISION HAS TO BE MADE ON THIS ULTIMATELY, AS TO WHETHER THIS IS VIABLE, IN LIGHT OF THE FACT THAT SDGE IS ASKING FOR MUCH MORE ON THESE LINES THAN WHAT IS CURRENTLY THERE WITH THE INCREASED CAPACITY, IS WHERE THE OBJECTION IS THE GREATEST. IT WAS SUPPOSE TO BE A SIMPLE REPLACEMENT, BUT SEMPRA SET UP A BAIT AND SWITCH. WE BELIEVE THIS IS GOING TO END EVENTUALLY UP WITH FUTURE EXPANSION OF TRANSMISSION. IT JUST DOES NOT FIT IN THE FOREST.

Sincerely, Shannon and William Davis // mail to // 1185 East Lane // Imperial Beach, CA 91932

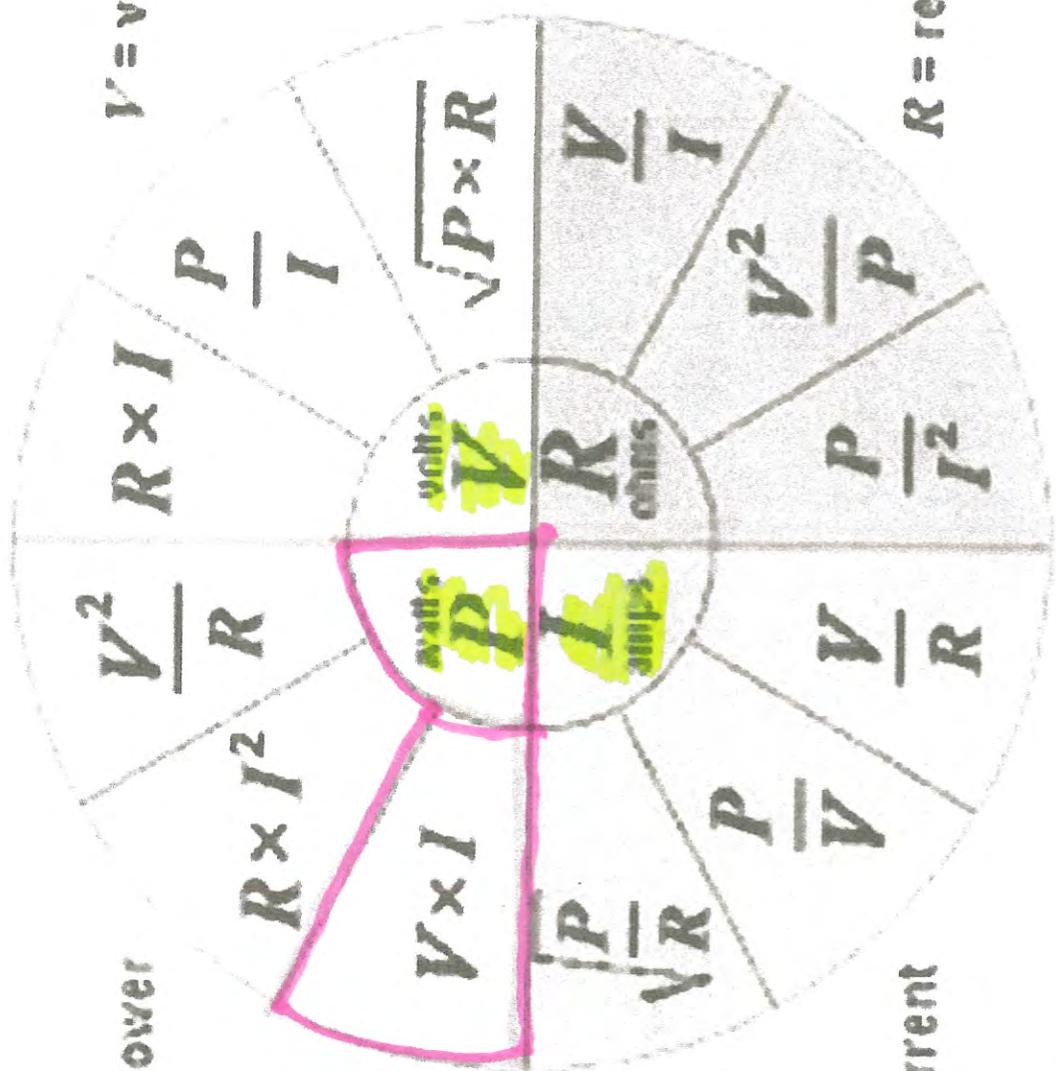
V = voltage

P = power

R = resistance

I = current

$P = V \cdot I$   
 WATTS      AMPS  
 VOLTS



~~$R = \frac{V}{I}$~~   
 ~~$R = \frac{V^2}{P}$~~   
 ~~$R = \frac{P}{I^2}$~~   
 ~~$R = \frac{V}{I}$~~   
 ~~$R = \frac{V^2}{P}$~~   
 ~~$R = \frac{P}{I^2}$~~

## Ohm's Law

$$E = IR$$

$$I = \frac{E}{R}$$

$$R = \frac{E}{I}$$

## Joule's Law

$$P = IE$$

$$P = \frac{E^2}{R}$$

$$P = I^2 R$$

WATTS = AMPS • VOLTS  
 WATTS = AMPS • VOLTS

Where,

✓ **E** = Voltage in **volts** ✓

✓ **I** = Current in amperes (**amps**) ✓

**R** = Resistance in ohms

✓ **P** = Power in **watts** ✓

ANALYZE !!!

ANS.

#4

Question 1.2-1 System Capacity

The Forest Service, in its December 7, 2012 comments on the preliminary Plan of Development asked the following question: Section, 4.1, Single to Double Circuit Conversion, **Question 1:** "The POD emphasizes that the proposed action would not increase system capacity, yet doubling certain circuits would appear to increase the capacity of the system between selected substations. The proposed action should explain any changes to system capacity that will result from the additional circuits."

Follow-up questions to SDG&E's response (02/15/13) are as follows:

- a) The common definition of "system capacity" is the maximum amount of power, generally expressed in terms of MVA or MW that can be transferred from one location to another. In the context of a transmission line the term "capacity" would imply the maximum amount of electric power that can be transferred over the transmission facility in a reliable manner. While the **voltage** of the facility is a key parameter the amount of **current** (ampacity) the conductor can safely transmit is also critical in determining the power transferred. For example a 69kV line capable of carrying 100 amps will have twice as much capacity to transmit power as a line carrying 50 amps.

In light of the above please provide all sources relied upon in support of the statement "System capacity", as used in this context, refers to the nominal operating voltages of the transmission facilities in question" Fully explaining why capacity is solely tied to voltage and not to power being transmitted.

- b) Describe the basis for SDG&E's statement that "These proposed reconfigurations do not in any way alter the potential system load nor allow for an increase in system capacity."

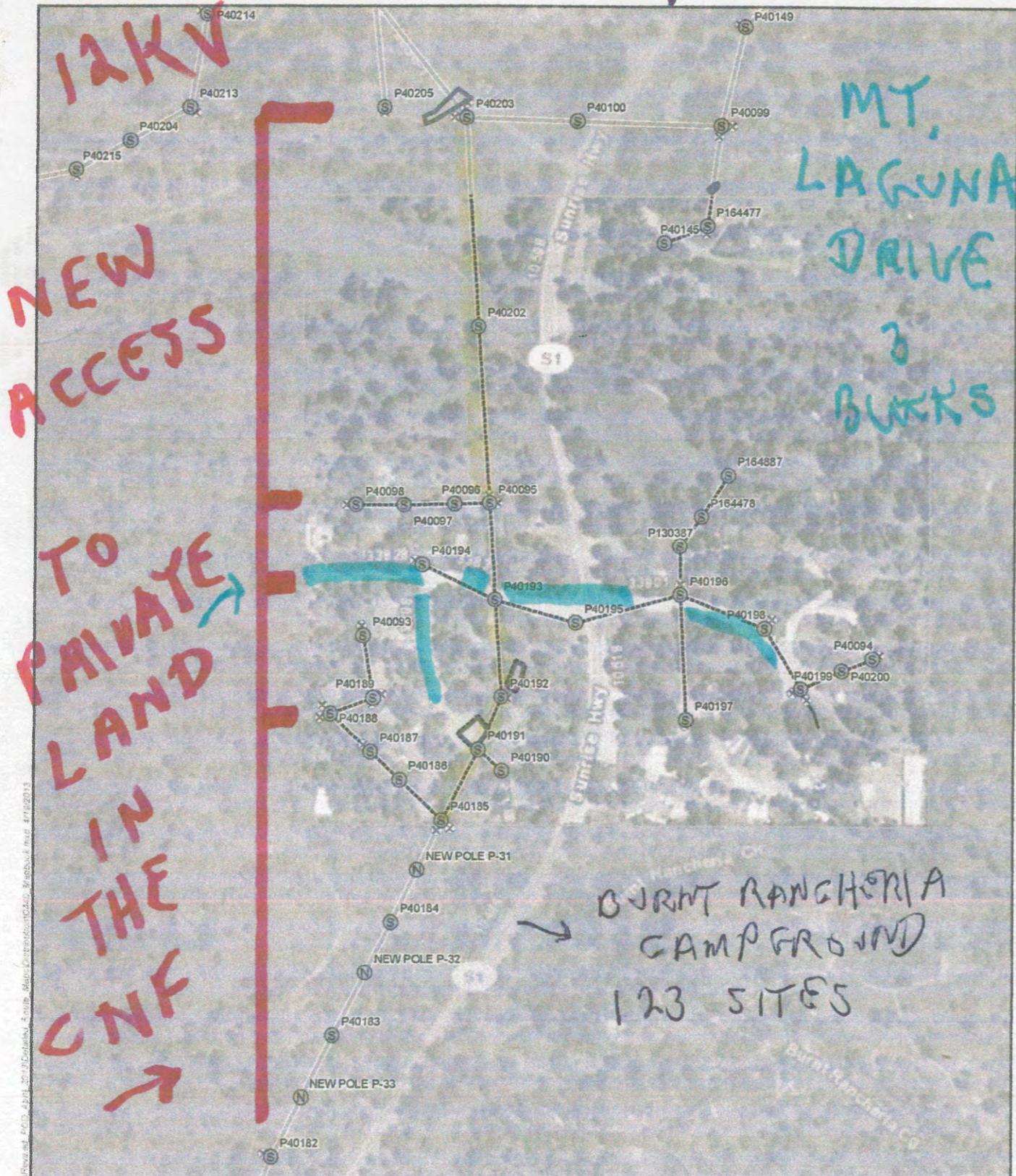
Is SDG&E suggesting that increasing the size of the conductor will not result in a corresponding increase in the ability of the lines to carry additional current and hence increase the system's ability to transmit power? If so, fully explain the electrical and applicable laws of physics used in support of the statement. If not, fully describe the impact the new conductor will have on the lines ability to transmit power.

YES

- c) With regard to the following statement:

From a technological perspective, the capacity of these power lines is limited to the voltage ratings of the substation facilities and other related equipment. To increase the system capacity, the installation of additional substation and associated equipment would be required. The Proposed Action does not include the installation of such equipment; therefore, the voltage rating and system capacity will remain the same. In addition, SDG&E would have to obtain CAISO approval and CPUC authority to increase the voltage ratings (i.e., the capacity of these lines). SDG&E is not requesting this authority from the CPUC or CAISO.

SUNRISE HIGHWAY

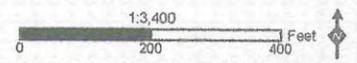


PRT. 06 271 RECORDS WRITTEN

Attachment B.9: C440 Route Map 35 of 52

CNF Revised Plan of Development

- New Steel Pole
- Removal
- ⊗ Wood-to-Steel Replacement
- Undergrounding
- Similar Actions Shown with Dashed Line
- Staging Area
- ▭ Stringing Site
- ▭ Similar Actions Work Areas Shown with Dashed Line
- United States Forest Service
- Stream
- Surveyed Drainage
- Pole to Remain, No Action
- ⊗ Anchor
- Access Road



Source: SDG&E, 2012; USFS, 2012; Chambers Group, Inc., 2012

← 400 FT →

SOE & E'S RESPONSE TO QUESTION #4

Finally, with regards to the ability of any future generation to connect to the 69 kV system in East County San Diego – none of the modifications discussed as a part of this project, in and of themselves, will allow interconnection of any proposed generation. Proposed generation will be required to go through the CAISO's generator interconnection process as specified in the CAISO's FERC tariff and Business Process Manual (BPM). This process requires extensive, detailed studies of any proposed generation's effects on the power line system and identifies necessary upgrades to the system for that generation to connect reliably and safely.

c) Ampacity of existing and new 69kV conductors at 37.8°C (100°F) ambient temperature, range from the following:

| Type             | Conductor Material | Temperature (°C) | Ampacity (Amps) |
|------------------|--------------------|------------------|-----------------|
| Existing         | 1/0 Cu             | 75°C             | 270             |
| Existing and New | 636 ACSS/AW        | 132°C            | 1,158           |

270°F = 1,444 Ampacity

$$\frac{1158}{270} = 4,2888$$

OR

$$\frac{1444}{270} = 5,348$$

$$392^{\circ}F$$

OR 482°F " WITHPOST LOTS OF STRENGTH "

THE MANUAL WIRE SOUTH WIRE SHOWS THE AMPACITY IS 444

| Code Word         | Size (kcmil) | Stranding (Al/St) | Diameter (in)    |       |            |                | Weight Per 1000 ft (lb) |       |       | Rated Strength (lb) | Resistance OHMS/1000 ft |           | Ampacity at 200°C (AMPS) |
|-------------------|--------------|-------------------|------------------|-------|------------|----------------|-------------------------|-------|-------|---------------------|-------------------------|-----------|--------------------------|
|                   |              |                   | Individual Wires |       | Steel Core | Complete Cable | Al                      | Steel | Total |                     | DC @ 20°C               | AC @ 75°C |                          |
|                   |              |                   | Al               | Steel |            |                |                         |       |       |                     |                         |           |                          |
| Junco/ACSS/AW     | 266.8        | 30/7              | .0943            | .0943 | .2829      | .66            | 252                     | 140   | 392   | 11200               | .0589                   | .0723     | 841                      |
| Ostrich/ACSS/AW   | 300          | 26/7              | .1074            | .0835 | .2506      | .68            | 283                     | 110   | 393   | 9360                | .0534                   | .0656     | 891                      |
| Linnet/ACSS/AW    | 336.4        | 26/7              | .1137            | .0885 | .2654      | .72            | 317                     | 123   | 440   | 10500               | .0476                   | .0585     | 960                      |
| Oriole/ACSS/AW    | 336.4        | 30/7              | .1059            | .1059 | .3177      | .741           | 318                     | 177   | 494   | 14200               | .0467                   | .0573     | 979                      |
| Brant/ACSS/AW     | 397.5        | 24/7              | .1287            | .0858 | .2574      | .772           | 374                     | 116   | 490   | 10400               | .0407                   | .0501     | 1061                     |
| Ibis/ACSS/AW      | 397.5        | 26/7              | .1236            | .0962 | .2885      | .783           | 374                     | 146   | 520   | 12400               | .0403                   | .0496     | 1071                     |
| Lark/ACSS/AW      | 397.5        | 30/7              | .1151            | .1151 | .3453      | .806           | 375                     | 209   | 584   | 16700               | .0395                   | .0486     | 1092                     |
| Flicker/ACSS/AW   | 477          | 24/7              | .141             | .094  | .2819      | .846           | 449                     | 139   | 589   | 12500               | .0339                   | .0418     | 1195                     |
| Hawk/ACSS/AW      | 477          | 26/7              | .1354            | .1053 | .316       | .858           | 449                     | 175   | 624   | 14900               | .0336                   | .0413     | 1207                     |
| Hen/ACSS/AW       | 477          | 30/7              | .1261            | .1261 | .3783      | .883           | 450                     | 251   | 701   | 20100               | .0329                   | .0405     | 1231                     |
| Parakeet/ACSS/AW  | 556.5        | 24/7              | .1523            | .1015 | .3045      | .914           | 524                     | 163   | 687   | 14600               | .0291                   | .0359     | 1323                     |
| Dove/ACSS/AW      | 556.5        | 26/7              | .1463            | .1138 | .3413      | .927           | 524                     | 204   | 728   | 17500               | .0288                   | .0355     | 1336                     |
| Eagle/ACSS/AW     | 556.5        | 30/7              | .1362            | .1362 | .4086      | .953           | 525                     | 293   | 818   | 22900               | .0282                   | .0348     | 1362                     |
| Peacock/ACSS/AW   | 605          | 24/7              | .1588            | .1058 | .3175      | .953           | 570                     | 177   | 746   | 15900               | .0267                   | .033      | 1397                     |
| Squab/ACSS/AW     | 605          | 26/7              | .1525            | .1186 | .3559      | .966           | 570                     | 222   | 792   | 19000               | .0265                   | .0327     | 1411                     |
| Wood Duck/ACSS/AW | 605          | 30/7              | .142             | .142  | .426       | .994           | 571                     | 318   | 889   | 24400               | .026                    | .032      | 1439                     |
| Teal/ACSS/AW      | 605          | 30/19             | .142             | .0852 | .426       | .994           | 571                     | 311   | 883   | 25000               | .026                    | .032      | 1438                     |
| Rook/ACSS/AW      | 636          | 24/7              | .1628            | .1085 | .3256      | .977           | 599                     | 186   | 785   | 16700               | .0255                   | .0314     | 1444                     |
| Grosbeak/ACSS/AW  | 636          | 26/7              | .1564            | .1216 | .3649      | .991           | 599                     | 233   | 832   | 19900               | .0252                   | .0311     | 1458                     |
| Scoter/ACSS/AW    | 636          | 30/7              | .1456            | .1456 | .4368      | 1.019          | 600                     | 334   | 935   | 25100               | .0247                   | .0305     | 1487                     |
| Egret/ACSS/AW     | 636          | 30/19             | .1456            | .0874 | .4368      | 1.019          | 600                     | 327   | 928   | 26300               | .0247                   | .0305     | 1486                     |
| Flamingo/ACSS/AW  | 666.6        | 24/7              | .1667            | .1111 | .3333      | 1              | 628                     | 195   | 823   | 17500               | .0243                   | .03       | 1489                     |
| Gannet/ACSS/AW    | 666.6        | 26/7              | .1601            | .1245 | .3736      | 1.014          | 628                     | 245   | 872   | 20900               | .024                    | .0297     | 1504                     |
| Stilt/ACSS/AW     | 715.5        | 24/7              | .1727            | .1151 | .3453      | 1.036          | 674                     | 209   | 883   | 18800               | .0226                   | .028      | 1559                     |
| Starling/ACSS/AW  | 715.5        | 26/7              | .1659            | .129  | .3871      | 1.051          | 674                     | 263   | 936   | 22000               | .0224                   | .0277     | 1576                     |
| Redwing/ACSS/AW   | 715.5        | 30/19             | .1544            | .0927 | .4633      | 1.081          | 676                     | 368   | 1044  | 29500               | .022                    | .0272     | 1605                     |
| Cuckoo/ACSS/AW    | 795          | 24/7              | .182             | .1213 | .364       | 1.092          | 749                     | 232   | 981   | 20900               | .0204                   | .0252     | 1671                     |
| Drake/ACSS/AW     | 795          | 26/7              | .1749            | .136  | .408       | 1.107          | 749                     | 292   | 1040  | 24400               | .0202                   | .025      | 1688                     |
| Macaw/ACSS/AW     | 795          | 42/7              | .1376            | .0764 | .2293      | 1.055          | 749                     | 92    | 841   | 11400               | .0209                   | .026      | 1630                     |
| Tem/ACSS/AW       | 795          | 45/7              | .1329            | .0886 | .2658      | 1.063          | 749                     | 124   | 873   | 13500               | .0208                   | .026      | 1620                     |
| Condor/ACSS/AW    | 795          | 54/7              | .1213            | .1213 | .364       | 1.092          | 749                     | 232   | 981   | 15800               | .0204                   | .026      | 1639                     |
| Mallard/ACSS/AW   | 795          | 30/19             | .1628            | .0977 | .4884      | 1.139          | 751                     | 409   | 1160  | 32900               | .0198                   | .0245     | 1721                     |
| Ruddy/ACSS/AW     | 900          | 45/7              | .1414            | .0943 | .2828      | 1.131          | 848                     | 140   | 988   | 15300               | .0183                   | .023      | 1767                     |
| Canary/ACSS/AW    | 900          | 54/7              | .1291            | .1291 | .3873      | 1.162          | 848                     | 263   | 1111  | 23200               | .018                    | .023      | 1779                     |
| Rail/ACSS/AW      | 954          | 45/7              | .1456            | .0971 | .2912      | 1.165          | 899                     | 149   | 1047  | 16200               | .0173                   | .0218     | 1836                     |
| Towhee/ACSS/AW    | 954          | 48/7              | .141             | .1097 | .329       | 1.175          | 899                     | 190   | 1088  | 19000               | .0172                   | .0214     | 1858                     |

ROOK

14  
15  
16

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# Maps

## California's Electric Transmission Lines

### OWNERS

- Pacific Gas & Electric (PG&E)
- Southern California Edison (SCE)
- Imperial Irrigation District (IID)
- Los Angeles Dept. of Water & Power (LADWP)
- San Diego Gas & Electric (SDG&E)
- Sacramento Municipal Utility District (SMUD)
- PacifiCorp
- Western Area Power Administration
- All Other Owners
- Cities

Pacific DC Intertie  
(Oregon/Washington)

# AAAC-6201

| Code Word | Size (kcmil) | Stranding | Diameter (ins.)  |                 | Cross-Sectional Area (Sq. ins.) | Weight Per 1000 ft. (lbs.) | Rated Strength (lbs.) | Resistance OHMS/1000 ft. |           | Allowable Ampacity+ (Amps) | ACSR With Equiv. Diam. |                    | Approx. EC Cond. With Equivalent Resistance |
|-----------|--------------|-----------|------------------|-----------------|---------------------------------|----------------------------|-----------------------|--------------------------|-----------|----------------------------|------------------------|--------------------|---|
|           |              |           | Individual Wires | Complete Cables |                                 |                            |                       | DC @ 20°C                | AC @ 75°C |                            | Size                   | Stranding (AL/STL) |   |
| Akron     | 30.58        | 7         | 0.0661           | 0.198           | 0.0240                          | 28.5                       | 1110                  | .659                     | .785      | 107                        | 6                      | 6/1                | 6   |
| Alton     | 48.69        | 7         | 0.0834           | 0.250           | 0.0382                          | 45.4                       | 1760                  | .414                     | .493      | 143                        | 4                      | 6/1                | 4   |
| Ames      | 77.47        | 7         | 0.1052           | 0.316           | 0.0608                          | 72.2                       | 2800                  | .260                     | .310      | 191                        | 2                      | 6/1                | 2   |
| Azusa     | 123.3        | 7         | 0.1327           | 0.398           | 0.0968                          | 115.0                      | 4460                  | .163                     | .195      | 256                        | 1/0                    | 6/1                | 1/0   |
| Anaheim   | 155.4        | 7         | 0.1490           | 0.447           | 0.1221                          | 144.9                      | 5390                  | .130                     | .154      | 296                        | 2/0                    | 6/1                | 2/0   |
| Amherst   | 195.7        | 7         | 0.1672           | 0.502           | 0.1537                          | 182.5                      | 6790                  | .103                     | .123      | 342                        | 3/0                    | 6/1                | 3/0   |
| Alliance  | 246.9        | 7         | 0.1878           | 0.563           | 0.1939                          | 230.2                      | 8560                  | .0816                    | .0973     | 395                        | 4/0                    | 6/1                | 4/0   |
| Butte     | 312.8        | 19        | 0.1283           | 0.642           | 0.2456                          | 291.7                      | 11000                 | .0644                    | .0769     | 460                        | 266.8                  | 26/7               | 266.8                                       |
| Canton    | 394.5        | 19        | 0.1441           | 0.720           | 0.3099                          | 367.9                      | 13300                 | .0511                    | .0610     | 532                        | 336.4                  | 26/7               | 336.4                                       |
| Cairo     | 465.4        | 19        | 0.1565           | 0.783           | 0.3655                          | 434.0                      | 15600                 | .0433                    | .0518     | 590                        | 397.5                  | 26/7               | 397.5                                       |
| Darien    | 559.5        | 19        | 0.1716           | 0.858           | 0.4394                          | 521.7                      | 18800                 | .0360                    | .0431     | 663                        | 477.0                  | 26/7               | 477.0                                       |
| Elgin     | 652.4        | 19        | 0.1853           | 0.927           | 0.5124                          | 608.4                      | 21900                 | .0309                    | .0371     | 729                        | 556.5                  | 26/7               | 556.5                                       |
| Flint     | 740.8        | 37        | 0.1415           | 0.990           | 0.5818                          | 690.8                      | 24400                 | .0272                    | .0327     | 790                        | 636.0                  | 26/7               | 636.0                                       |
| Greeley   | 927.2        | 37        | 0.1583           | 1.108           | 0.7282                          | 864.6                      | 30500                 | .0217                    | .0263     | 908                        | 795.0                  | 26/7               | 795.0                                       |

+Ampacity based on 75°C conductor temperature, 25°C ambient temperature, 2 ft/sec. wind in sun, emissivity 0.5, 52.5% conductivity.

$250^{\circ}C \approx 680^{\circ}F$

$\frac{9}{5}C + 32 = F$

$(F - 32) \frac{5}{9} = C$

$\frac{9}{5}(250^{\circ}C) + 32 = F$   
 $360 + 32 = 392^{\circ}F$

$(\frac{9}{5} \times 250^{\circ}C) + 32 = F$   
 $450 + 32 = 482^{\circ}F$

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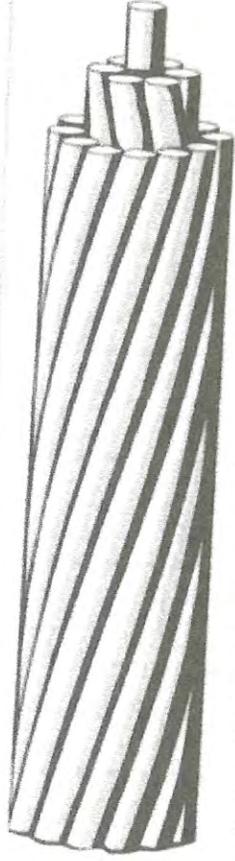
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**ACSS**



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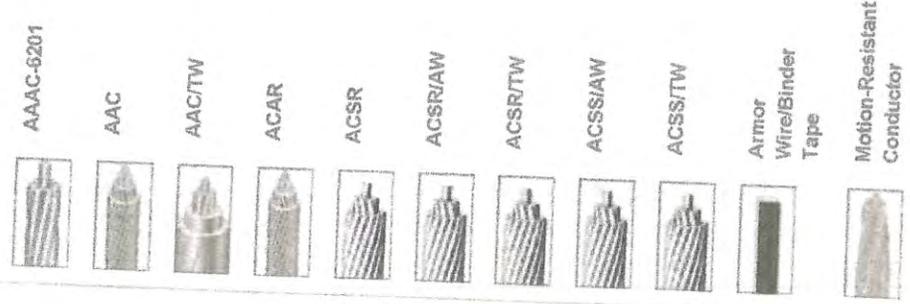
**APPLICATIONS**

ACSS is used for overhead distribution and transmission lines. It is designed to operate continuously at elevated temperatures up to 250°C without loss of strength; it sags less than a comparable ACSR under electrical loadings; it is self-damping if prestretched during installation; and its final sags are not affected by long term creep of aluminum. The advantages make ACSS especially useful in reconductoring applications requiring increased current with existing tensions and clearances, new line applications where structures can be economized because of reduced conductor sag, new line applications requiring high emergency loadings, and lines where aeolian vibration is a problem.

**Code Words:**

- Partridge, Junco, Ostrich, Linnet, Oriole, Brant, Ibis, Lark, Flicker, Hawk, Hen, Parakeet, Dove, Eagle, Peacock, Squab, WoodDuck, Teal, Rook, Grosbeak, Scooter, Egret, Flamingo, Gannet, Stilt, Starling, Redwing, Cuckoo, Drake, Macaw, Tern, Condor, Mallard, Ruddy, Canary, Redbird, Rail, Towhee, Cardinal, Canvasback, Snowbird, Ortolan, Curlew, Bluejay, Finch, Bunting, Bittern,
- OEM
- SCR Technologies
- Canada

**RELATED PRODUCTS**



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## Conductor clashing

Using a range of data capture techniques including airborne, mobile and terrestrial LiDAR, NM Group can generate ~~Set~~ maps of powerline circuits at risk of conductor clashing.

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**Existing powerlines links** (<http://www.nmgroup.com/en/services/surveying-and-mapping/arrow>)

**Thermal ratings confirmation** (<http://www.nmgroup.com/en/sectors/arrow/>)

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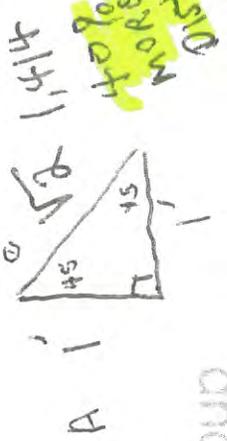
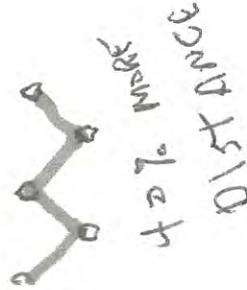
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**New power lines** (<http://www.nmgroup.com/en/sectors/new-powerlines/>)

**Substations** (<http://www.nmgroup.com/en/sectors/substations/>)

5. Insulator P2 has been raised to obtain the required clearance distance.

SPACER  
MODIFIED  
GROSS-ARM



Once a threat has been identified, remediation options can then be offered and evaluated which include:

Downloads (<http://www>)

News & Events (<http://www>)

1. Installing a spacer between the conductors.

2. Lengthening the cross arm to increase clearance between the conductors, and re-tensioning the conductor that has been moved result.

About us (<http://www>)

3. Re-tensioning the span.

Contact us (<http://www>)

4. Relocating the poles to reduce the span length, which in turn will reduce movement at mid-span.

5. In some cases simply increasing the length of the post insulator on the middle conductor of delta configuration distribution will resolve the issue in a very cost effective manner.

---

**From:** Richard Garner <rgarner\_1998@hotmail.com>  
**Sent:** Tuesday, November 04, 2014 8:42 PM  
**To:** CNFMSUP  
**Subject:** SDG&E Master Permit DEIR/DEIS Comments

I would like to add my voice to the concerns raised by others including the Sierra Club regarding the SDG&E application for a Master Permit for their power line replacement project through areas of the Cleveland National Forest. I specifically wish to express my concern about the very real increased fire hazard that will be created in many areas by this project. It is my understanding that this power line replacement will involve an increase in the physical size of the sections replaced from 1/2 inch to 1 full inch and further, that this increased physical size will mean an increase in the capacity of the line to carry more current, that is, more electricity. This increase in the capacity of the line will inevitably mean an increased fire hazard and an increase in the potential electromagnetic effects coming from the line on the life, on the ecosystems of the forest. SDG&E should be required to disclose that their power line replacement will have this increased electrical capacity and further required to address effectively the consequent effects.

The risk of fire in San Diego County, especially in the forested areas, is very real. The effects of a fire over a large area can be devastating not just in terms of lives lost or disrupted and property damaged or lost but in terms of the indirect effects, economic and psychological, on citizens and residents living throughout the county. This is even more true than it used to be because of the effects of climate change including the drying out of the forest and the statewide drought which in turn is an effect of climate change and shows no sign of letting up in any major way as far into the future as we can see.

It has already been shown that a SDG&E power line was held to be partly responsible for a major fire and the damage it caused of a few years ago. SDG&E was successfully sued.

I also wish to express my opposition to allowing SDG&E to have any kind of cameras, video cameras, or infrared cameras, in the Cleveland National Forest. There is no good reason for this whatsoever.

SDG&E should absolutely be required to underground their power line replacement for the overwhelming majority of the length of the replacement sections except where they can conclusively provide reasons why it is impractical or not technical feasible. In those cases where they claim it is impractical they should be required to thoroughly document why.

In every case, the maximum feasible protection of the forest and the public should be maintained.

Sincerely yours,

Richard Garner  
121 Orange Ave., Sp. 115  
Chula Vista, CA 91911  
Phone: (619) 425-5279

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 10:07 AM

To: CNFMSUP

Subject: Sdg&e master permit comments

Attachments: Screenshot\_2014-11-04-06-06-28.png

The master permit has a section in the document regarding C78, the 12kv powerline that roughly parallels Viejas Grade road. The current plan moves the powerline close to the road to minimize its impact on CNF lands. As currently proposed, I do support moving this powerline.

However, I request the master permit go one step further and remove the line in the CNF section that spans the two areas of private land. To clarify, this powerline runs roughly east/west from the Descanso substation to the Viejas casino. The powerline is connected on either end to the rest of the grid. The powerline travels through private land on either side of the CNF land. All of the customers are on either side of the CNF land. I request the master plan remove this powerline from the CNF land between the private property on Viejas grade. Removing that middle section would increase public safety, increase the scenic integrity of the forest, and save SDG&E money.

In fact, the only reason to keep this section appears to be future expansion plans along this route from the Descanso substation. Removal of this forest section would result in no loss of electrical service because the powerline is supported and fed by both sides. Image/map shows C78 section in blue/green color on CNF forest land that should be removed.

Sent from my Verizon Wireless 4G LTE smartphone



Figure 2: Facilities to be Reconstructed

CNF Rev





From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 10:11 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

Please include language in the master permit to prohibit SDG&E and its contractors from installing cameras in the CNF. Please ensure this prohibition applies to both standard image/movie cameras and thermal/infrared cameras.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 10:17 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

In the master permit documents, please include language to limit the usage of aviation visibility balls installed on wires. Please require SDG&E to evaluate every location where these balls will be potentially installed. Require SDG&E to release alternatives to the CNF to move the line or add additional poles to reduce the need for aviation visibility balls. Aviation visibility balls directly impact the scenic integrity of the national forest.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 10:28 AM

To: CNFMSUP

Subject:Sdg&e master permit comments

As a condition of master permit approval, please require SDG&E to open up Bell Bluff Road for public access to National Forest lands along Bell Bluff. Public access includes either or both foot and/or vehicle usage. Please also require SDG&E to allow public access to mitigation property around the Suncrest Substation.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 3:05 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

I support the master permit plan to remove C79, the powerline up the west side of Cuyamaca. I question the logic and cost to underground a new powerline up the east side of Cuyamaca. My comments relate to today's solar energy technology. Please initiate the data request process to compare the cost and environmental impact of an underground powerline to the top of Cuyamaca verses a solar and battery system located near the top of Cuyamaca.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 3:35 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

I question the logic and cost in the section of the master permit document that places approximately 1500 feet of 69kv powerline underground on La Jolla Indian reservation. The La Jolla reservation 69kv is to be placed underground in something similar to the reservations economic zone. I interpret this language as SDG&E will be undergrounding powerlines for a casino and the casinos appearance. Please return SDG&E focus in the master permit on undergrounding for public safety rather than favors for reservations.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 3:36 PM

To: CNFMSUP

Subject: Sdg&e master permit comments

I question the logic and cost in the current master permit behind SDG&E willingness to underground a powerline up Cuyamaca (C79) and then build D79 above ground. The cost of undergrounding should be the same in both locations. The public safety issue of an above ground powerline in the windiest area in Southern California should be put front and center. At a minimum, SDG&E should be required to and be willing to place an equal length of D79 underground in the windiest and highest fire danger areas.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 5:23 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

In reference to ES.7, the federal preferred alternative in the executive summary, I have comments regarding the following sentence. "The federal preferred alternative also incorporates the portions of the partial removal of overland access road alternative applicable to TL625, C442, and TL629."

Most of the erosion data, comments, and grade measurements were taken on TL626/D79. Please note, TL626/D79 share the same pole and access roads. I see in the summary that the federal preferred alternative removes TL626 from service, but rebuilds D79. From the sentence quoted above in the executive summary, the conclusion can be drawn that the easement/access road used for D79 will be left in service. Please clarify or modify the master permit document to state D79 access roads in excess of max grade limit (currently 25%) will be removed as well. D79 access road has numerous stretches over 25% including one location shown in previous comments that reaches 47% grade.

In summary, if the intent of the master permit language was to keep the access road across Boulder Creek and the entire Boulder Creek Gorge (D79) open and in service, please include in this comment letter all erosion photos and powerpoint presentations submitted by comments to the master permit in the last two years relating to access roads in the CNF.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 5:39 PM

To: CNFMSUP

Subject:Sdg&e master permit comments

Comments regarding master permit section D. 9-4.3. MM HYD-4, access road condition and repair design report addressing roads exceeding 15% grade over 100 feet. Please re-evaluate the 100 foot criteria and change to a 50 foot standard.

Sent from my Verizon Wireless 4G LTE smartphone

From: nweflen <nweflen@yahoo.com>

Sent: Tuesday, November 04, 2014 5:45 PM

To: CNFMSUP

Subject: Sdg&e master permit comments

Master permit comments relating to table D.9-9, SDG&E exclusive use access roads to be removed. I do not see D79 listed on this table. D79 shares access roads with TL626 which are likely the steepest road grades in the system. D79 should be the number one priority road to be addressed in table D.9-9.

Sent from my Verizon Wireless 4G LTE smartphone