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Sent: Friday, March 04, 2011 6:47 PM
To: ECOSUB; 'catulewind@blm.gov'; Fisher, Iain (iain.fisher@cpuc.ca.gov); 'nms@cpuc.ca.gov'
Cc: de Llanos, Estela; O'Beirne, Kevin
Subject: Comments of SDG&E - Joint Draft EIR/EIS for East County Substation Project
Attachments: SDGE ECO DRAFT EIR-EIS Comments (03-04-11S).pdf

San Diego Gas & Electric Company (SDG&E) submits the attached comments to the California Public Utilities Commission (CPUC) and the United States Department of Interior, Bureau of Land Management (BLM) on the Joint Draft Environmental Impact Report/Draft Environmental Impact Statements (EIR/EIS) for the East County Substation Project.

In addition, SDG&E will be sending hard copies via Fedex to the recipients of this e-mail.

Please contact me with any questions you may have.

Best regards,

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March 4, 2011

Mr. Iain Fisher, California Public Utilities Commission
Mr. Greg Thomsen, U.S. Department of the Interior, Bureau of Land Management
c/o Dudek
605 Third Street
Encinitas, California 92024

Re: Joint Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for
East County Substation Project (State Clearinghouse No. 2009121079; DOI-BLM-CA-D070-
2010-0027-EIS (ECO SUB))

Dear Mr. Fisher and Mr. Thomsen:

San Diego Gas & Electric Company (SDG&E) submits the attached comments to the California Public Utilities Commission (CPUC) and United States Department of Interior, Bureau of Land Management (BLM) on the Joint Draft Environmental Impact Report/Draft Environmental Impact Statement (EIR/EIS) for the proposed East County Substation Project (ECO Substation Project or Project).

SDG&E commends CPUC and BLM on their comprehensive analysis and consideration of the ECO Substation Project, as well as a number of other renewable energy projects that may interconnect with SDG&E transmission facilities in the future. The Draft EIR/EIS documents the extraordinary effort by CPUC and BLM to predict the future potential environmental impacts of multiple projects and to maximize public disclosure of those potential impacts. The Draft EIR/EIS far exceeds the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

SDG&E believes that in an effort to disclose all possible future impacts, the Draft EIR/EIS conservatively and unnecessarily combines distinct projects and overstates the future potential environmental impacts. As explained in more detail below, SDG&E urges the CPUC and BLM to prepare and certify the Final EIR/EIS and approve the ECO Substation Project without further delay for the following reasons:

- As required by CEQA and NEPA, the Draft EIR/EIS is “adequate,” “complete,” and represents more than a “good faith effort” at full disclosure. In an effort to consider and disclose even the most remote impacts, the CEQA/NEPA document for the ECO Substation Project has evolved into a joint Draft EIR/EIS for the ECO Substation and *five* renewable energy projects that are beyond the scope of SDG&E’s Permit to Construct (PTC) application, and none of which are subject to CPUC approval.¹

¹ In addition to the ECO Substation Project, the Draft EIR/EIS analyzes five renewable energy projects: the Energia Sierra Juarez Gen-Tie and Tule Wind projects, which are considered at the “project level,” and the Campo Wind, Manzanita Wind, and Jordan Wind projects, which are analyzed at a “programmatic” level.

- SDG&E has determined that the environmentally superior alternative to the ECO Substation Project identified in the Draft EIR/EIS is feasible and has revised the ECO Substation Project accordingly. This environmentally superior alternative includes changes to the substation footprint and the undergrounding of a segment of the 138kV line. SDG&E has conducted additional analysis to confirm that these changes to the ECO Substation Project are feasible and will not result in substantial new impacts or trigger recirculation of the Draft EIR.
- The Draft EIR/EIS concludes that construction of this modified version of the ECO Substation Project is environmentally superior to not constructing the ECO Substation Project. SDG&E agrees with this conclusion.
- The Draft EIR/EIS conclusion that the No-PROJECT Alternative, (i.e., not constructing any of the projects described in the Draft EIR/EIS) is environmentally superior to constructing all of the projects – after coming to the opposite conclusion on an individual project-by-project basis – defies logic and common sense. The EIR/EIS underestimates the environmental benefits of building the PROJECT and the environmental harms of *not* building the PROJECT should be taken into greater consideration.
- The Draft EIR/EIS is the product of well over a year of analysis and consideration by multiple federal, state, and local agencies. SDG&E originally filed its application for a PTC to construct the ECO Substation Project in August 2009. In an effort to present the most up-to-date analysis possible, the Draft EIR/EIS was delayed until December 2010 to incorporate evolving information about other projects considered in the document.
- The BLM and CPUC have provided extraordinary opportunities for public review and comment. The original 54-day period to allow for public comments on the Draft EIR/EIS was extended to 70 days in an effort to provide the broadest possible opportunity for public comment. For an EIR prepared under CEQA, anything over 60 days is considered unusual.² In addition, the CPUC and BLM have held multiple meetings in the community to solicit public input.
- The conservative analysis presented in the Draft EIR/EIS overestimates the impacts of the ECO Substation Project. The Draft EIR/EIS overstates the potential significant impacts associated with the ECO Substation Project and in some cases recommends mitigation measures that are unnecessary or disproportionate to the impact.

These projects will not be constructed by SDG&E and therefore are not subject to CPUC jurisdiction. Depending on the ultimate scope and location of these projects, CPUC approval may be required for electric public utility facilities related to these projects. As noted in the Draft EIR/EIS, these projects will be subject to future project-specific environmental review.

² Under CEQA Guidelines section 15105, the public review period for a draft EIR “should not” exceed 60 days “except in unusual circumstances.”

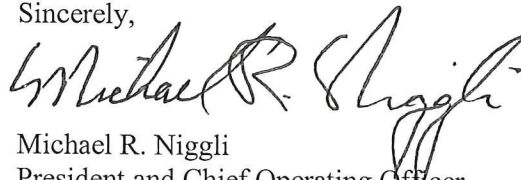
- Specific overriding considerations outweigh any potential environmental impacts of the ECO Substation Project. The ECO Substation Project will provide substantial benefits that must be considered. These benefits include facilitating California's renewable energy goals within a reasonable timeframe, advancing the State's efforts to reduce its carbon emissions consistent with Assembly Bill 32 (Stats. 2006, ch. 488), furthering federal energy policies and goals, creating an interconnection hub for renewable generation, improved service reliability throughout several communities in East San Diego County, and helping to create green jobs while boosting the local and regional economy.
- Any further delay of the ECO Substation Project will impede implementation of federal and state renewable energy requirements and policy objectives. The Project must move forward in a timely manner to facilitate compliance with California's ambitious Renewable Portfolio Standards (RPS) and greenhouse gas reduction requirements. Failure to do so will impede the ability to meet State and CPUC requirements and policy goals. SDG&E reached approximately 12% RPS by year-end 2010 and further Project delays jeopardize its ability to meet its goals and state mandates. Opponents to any of the six projects evaluated in the Draft EIR/EIS can be expected to argue for additional delay and recirculation in an effort to derail one or more of the individual projects. The Draft EIR/EIS is a conservative robust analysis that does not require recirculation.

Additional support for these points is contained in the attached materials prepared by the ECO Substation Project team.

For all of the foregoing reasons, SDG&E respectfully requests that the CPUC and BLM prepare and certify the Final EIR/EIS, and that the Final EIR/EIS: (1) acknowledge that the "No ECO/Tule/ESJ or Campo/Manzanita/Jordan" Alternative is neither environmentally superior, nor preferred by the agencies, nor feasible; (2) reflect the most accurate project description for the ECO Substation Project as discussed in Attachment A – Updated Project Description and ECO Substation Alternative Site; (3) revise the mitigation measures identified for the ECO Substation Project as proposed in Attachment B – Proposed Mitigation Measure Revisions; and (4) incorporate the technical corrections and clarifications described in Attachment C – Technical Corrections and Clarifications. Overriding considerations that should be considered by the CPUC are discussed in more detail in Attachment D. In addition, because there is no need given the conservative and comprehensive approach in the Draft EIR/EIS, SDG&E urges the CPUC and BLM not take the extraordinary step of recirculating the Draft EIR/EIS.

SDG&E appreciates this opportunity to comment on the ECO Substation Project and looks forward to receiving the Final EIR/EIS for the ECO Substation Project.

Sincerely,



Michael R. Niggli
President and Chief Operating Officer
San Diego Gas & Electric Co.

DETAILED COMMENTS ON THE DRAFT EIR/EIS

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

Cal. Code Regs. tit. 14, § 15151.

SDG&E proposes to construct the ECO Substation Project to improve service reliability to communities in Eastern San Diego County and to provide an interconnection hub for renewable generation developed near the existing Southwest Powerlink (SWPL) 500 kilovolt (kV) transmission line. As a California public utility, SDG&E is required to provide reliable electric service to all of its customers. Consistent with this obligation, a primary objective of the ECO Substation Project is to improve service reliability for the communities of Bankhead Springs, Boulevard, Jacumba and Manzanita, as well as the Campo, La Posta, and Manzanita Indian Reservations, which experience periodic outages due to a long radial 69 kV transmission system as the only source.

In addition, consistent with state RPS requirements and federal policy initiatives, SDG&E is committed to developing renewable energy to meet demand for electricity, California's RPS goals and greenhouse gas (GHG) reduction requirements. SDG&E is also required by federal law, including Federal Energy Regulatory Commission (FERC) regulations, to provide interconnection service to Independent Power Producers. Since SDG&E submitted the application for a Permit to Construct in August 2009, the need for the ECO Substation Project has increased considerably as the interconnection queue has grown by hundreds of megawatts (MW) of wind and solar energy.³ The ECO Substation Project will create an interconnection hub into which renewable generation can connect at three voltage levels—138 kV, 230 kV, and 500 kV—reducing the potential or need for constructing a series of switching stations (as part of the renewable projects' licensing and construction) and other facilities along SWPL. The proposed voltage levels would economically facilitate interconnection of generation projects of different sizes to the appropriate voltage.

SDG&E fully appreciates the CPUC and BLM's respective obligations under CEQA and NEPA to analyze, disclose and mitigate where feasible the environmental effects of the ECO Substation Project.

³ At the time SDG&E filed its PTC application, there were three projects seeking interconnection at ECO for a total of 1,120 MW and two projects seeking interconnection at Boulevard 138 kV with a total capacity of 361 MW. Today there is an additional 20 MW project interconnecting to the ECO 138 kV bus, and the number of projects requesting interconnection at Boulevard 138 kV is five with a total capacity of 596.5 MW. One has an executed LGIA, two are in the Phase II of the CAISO study process and one is in the Phase I study process. There are also two projects in the SGIP process totaling 40 MW for connection at 138 kV and one 5 MW project interconnection at the 12 kV. No additional details are available at this time about any of these projects, all of which are renewable resource projects.

The Draft EIR/EIS fully complies with both CEQA and NEPA, and the CPUC and BLM have satisfied their respective obligations to analyze and disclose the environmental effects of the ECO Substation Project.

SDG&E is troubled, however, by the suggestion that it is environmentally superior for *none* of the projects described in the Draft EIR/EIS to be constructed. This conclusion ignores the legislative and regulatory context of policies and requirements to develop renewable energy, as well as the environmental consequences of not constructing any renewable energy projects in southeastern San Diego County. In addition, SDG&E believes that in an extraordinary effort to portray a “worst-case” analysis of the potential environmental impacts, the Draft EIR/EIS vastly overstates the effects of the ECO Substation Project and proposes mitigation measures that are unwarranted or disproportionate to the impacts.

The projects evaluated under the Draft EIR/EIS are, in fact, separate projects. The Draft EIR/EIS, in an extreme effort to “belt and suspend” compliance with CEQA and NEPA, takes the conservative position that SDG&E’s ECO Substation Project, Iberdrola’s Tule Wind Project, Sempra Generation’s ESJ Wind Project, Campo/Invenergy’s Wind Project, the Manzanita Tribe’s Manzanita Wind Project, and Enel Green Power’s Jordan Wind Project⁴ – should be all evaluated as one PROJECT, by virtue of their proposed (and sometimes geographically remote) physical connection to the ECO Substation Project –even though with the exception of the ECO Substation Project, none of the subsequent projects are subject to CPUC approval under the California Public Utilities Code. The BLM has already indicated that separate Records of Decision will be prepared for the ECO Substation and Tule Wind Projects, and the CPUC has acknowledged that: (1) it has no jurisdiction over the Tule Wind Project or ESJ Project and that (2) subsequent project-specific environmental review would be conducted for the Jordan, Campo or Manzanita projects by jurisdictional agencies after the programmatic review completed here for these three projects.⁵ Although the Draft EIR/EIS could have reviewed the six projects as separate, cumulatively considerable projects, the Draft EIR/EIS instead conducts a detailed, *project-level* analysis of three projects (e.g., ECO, Tule and ESJ). This level of detail for the six projects far exceeds CEQA’s and NEPA’s requirements.

In light of the extensive amount of environmental analysis and worst-case assumptions, the Draft EIR/EIS more than adequately discloses and addresses the environmental impacts associated with the ECO Substation Project. SDG&E therefore urges the CPUC and BLM to prepare and certify a Final EIR/EIS for that project at this time. While SDG&E does not believe questions remain about the other

⁴ The Jordan project is now called the Jewel Valley Project. SDG&E does not express any views on the analysis of the other projects described in the Draft EIR/EIS.

⁵ The Draft EIR/EIS contains multiple references to the fact that this document provides programmatic review of the Campo, Manzanita and Jordan wind projects. *See* Executive Summary at 3-4, 13; Introduction/Overview at A-2; Project Description at B-1. *See In re Bay-Delta Programmatic EIR Coordinated Proceedings*, 43 Cal. 4th 1143, 1174-75 (2008) (An agency has discretion under CEQA to reserve project-level analysis for specific projects until it is considering approval of those specific projects.).

projects evaluated in the Draft EIR/EIS, to the extent they do, SDG&E urges the CPUC and BLM to prepare and certify the Final EIR/EIS and allow any questions about those projects to be resolved in the context of the project specific review and approvals required separately for those projects.

This letter respectfully requests that the CPUC and BLM prepare and certify the Final EIR/EIS to (1) acknowledge the potential environmental consequences associated with not constructing any of the renewable energy projects described in the Draft EIR/EIS and clarify that the “No PROJECT” alternative is not environmentally superior or preferred by the agencies; (2) reflect modifications to the ECO Substation Project that include, among other things, selection of the “ECO Substation Alternative Site” identified in the Draft EIR/EIS as environmentally superior; (3) revise the proposed mitigation measures for the ECO Substation Project that, as discussed below, are either not warranted by the potential impacts, not feasible, or redundant; and (4) incorporate the additional technical information and corrections for inclusion in the Final EIR/EIS.

**THE “NO ECO/TULE/ESJ/CAMPO/MANZANITA/JORDAN” PROJECT ALTERNATIVE
IS NEITHER FEASIBLE NOR ENVIRONMENTALLY SUPERIOR
AND SHOULD BE REJECTED**

The Draft EIR/EIS presents a recommendation regarding the environmentally superior alternative. While finding that each of the three individual projects—ECO Substation, Tule Wind and ESJ Gen-Tie—should be developed and is environmentally superior to the individual no project alternatives, the Draft EIR/EIS concludes that the scenario in which none of the projects described in the Draft EIR/EIS⁶ is constructed is environmentally superior to construction of the projects. The Draft EIR/EIS immediately follows that recommendation with the consequences that would occur should the projects not be developed:

There would be no new renewable energy source in the southeastern portion of San Diego County, and consequently, the region may not meet its California RPS program and associated Executive Order requirements to develop renewable energy on federal lands in compliance with the Energy Policy Act of 2005. The southeastern energy transmission system servicing the Boulevard, Jacumba, and other surrounding communities would remain unstable.

(Draft EIR/EIS at ES-24.)

The No PROJECT Alternative is Not Feasible and Fails to Meet Project Objectives

The suggestion that not constructing *any* renewable energy projects could be environmentally superior flies in the face of extensive climate change policies and requirements developed over the last decade. The State of California, the federal government and project initiatives have established a foundation for the development of renewable resources, as recognized in the Draft EIR/EIS. In 2002, Senate Bill 1078 established the RPS program, requiring 20% renewable energy by 2017. The 2003

⁶ Under No Project Alternative 1, the proposed “PROJECT” includes the ECO Substation, Tule Wind, ESJ Gen-Tie, Campo Wind, Manzanita Wind, and Jordan Wind projects. The cumulative “No PROJECT” scenario assumes that none of these projects would be constructed.

Energy Action Plan accelerated the RPS deadline to 2010. In 2006, Senate Bill 107 codified the accelerated deadline into law. The 2005 Energy Action Plan examined a further goal of 33% by 2020. The State legislature adopted Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, which mandates that California reduce GHG emissions to 1990 levels by 2020. The Governor's 2008 Executive Order S-14-08 formally set the target of 33% by 2020. The Governor also issued Executive Order S-21-09, which directed the California Air Resources Board (CARB) to adopt regulations consistent with the Executive Orders.⁷ Draft EIR/EIS at D.18-8 to 12.

In response to this extensive list of California laws, mandates and orders, there have been a number of initiatives involving widespread stakeholders with the objective of developing plans to meet these critical renewable goals. The Renewable Energy Transmission Initiative (RETI) is a statewide initiative established to help identify the transmission projects needed to accommodate these renewable goals, support future energy policy, and facilitate transmission corridor designation and transmission and generation siting and permitting. The RETI effort is supervised by a coordinating committee including the CPUC, the California Energy Commission (CEC), the California Independent System Operator (CAISO) and various publicly owned utilities, with participation by a broad range of stakeholders, including the State's investor-owned utilities.

Another initiative includes the California Transmission Planning Group (CTPG), which is a forum for conducting joint transmission planning and coordination of transmission activities in order to meet the State's 33% by 2020 RPS goal. This effort is seeking to leverage a diverse portfolio of renewable energy generation technologies available to supply projected electricity demand in concert with the energy goals and mandates of the State of California.

The State of California has clearly paved the road for the development of renewable resources and the reduction in greenhouse gas emissions with ambitious legislation and policies. The Draft EIR/EIS agrees in stating that "The Proposed PROJECT is an important element in developing additional renewable energy resources required to meet the current and future California RPS and federal Energy Policy Act goals for developing renewable energy." Draft EIR/EIS at A-8. The CPUC's identified project objectives specifically embrace these policies, namely:

C-1 Accommodate delivery of renewable energy to meet state and federal renewable energy goals from wind and solar sources in San Diego County.

C-2 Meet California's RPS program requiring utilities to purchase 20% of energy from renewable sources by 2010.

⁷

On September 23, 2010, pursuant to its authority under Assembly Bill 32 (AB 32), the California Air Resources Board adopted the "Renewable Electricity Standard" (RES), which requires a 33% by 2020 renewable energy procurement mandate for most retail sellers of electricity in California, including but not limited to SDG&E. The RES is an independent requirement from California's existing RPS. California Air Resources Board, Resolution 10-23 (Sept. 23, 2010), available at <http://www.arb.ca.gov/regact/2010/res2010/res1071attb.pdf>.

C-3 *Meet the Governor's Executive Order S-14-08 that increased the RPS goal to 33% by 2020.*

C-4 *Improve the reliability of power delivery to the communities of Boulevard, Jacumba and surrounding communities.*

Draft EIR/EIS at A-11.

In light of these policies and requirements, not constructing “*any other* new renewable energy source in the southeastern portion of San Diego County” is not a feasible alternative and should be rejected.⁸ All of the projects described in the Draft EIR/EIS are located in an area that is considered rich in renewable resources and was identified in the CPUC-sponsored studies as a Competitive Renewable Energy Zone (CREZ).⁹ A primary objective of the ECO Substation Project is to meet SDG&E’s RPS commitments and to accommodate the delivery of renewable energy according to regulatory and legislative timetables. The Final EIR/EIS should acknowledge that the “No PROJECT” alternative is simply not feasible under the circumstances. Indeed, in the recently issued Final EIR/EIS for the Eldorado-Ivanpah Transmission Project (November 2010) (at pp. 4-7), the CPUC found that the No Project/No Action Alternative would not meet the agency’s project objectives, and thus determined that the environmentally superior alternative is the proposed project to build the transmission line for a solar project. The same finding should be made here.

The Final EIR/EIS Should Acknowledge the Environmental Consequences of the No PROJECT Alternative

The conclusion that the “No PROJECT” alternative is environmentally superior ignores the adverse environmental consequences of not constructing the ECO Substation, Tule, ESJ, Campo, Manzanita, Jordan, “*or any other* new renewable energy source in the southeastern portion of San Diego County.” CEQA and NEPA require that the CPUC and BLM consider the environmental consequences of no other new renewable energy source being constructed in the southeastern area of San Diego County.

⁸ CEQA defines “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.” Cal. Pub. Res. Code § 21061.1. *See also Seattle Audubon Soc’y v. Mosley*, 80 F.3d 1401, 1404 (9th Cir. 1996) (per curiam) (A federal agency is under no obligation to consider “alternatives that are unlikely to be implemented or those inconsistent with its basic policy objectives”); *Laguna Greenbelt, Inc. v. U.S. Dep’t of Transp.*, 42 F.3d 517, 525 (9th Cir. 1994) (rejecting alternative that did not meet project purpose and need).

⁹ In adopting Senate Bill (SB) 1078 in 2002, the Legislature made it clear that the CPUC should facilitate the construction of new transmission facilities necessary to accommodate the development of renewable resources in the state. In particular, California Public Utilities Code Section 399.2.5, adopted as part of SB 1078, directs the CPUC to approve construction of transmission facilities that facilitate the achievement of the renewable power goals established by that law, and further directs the CPUC to support actions that are necessary to assure that the costs of such transmission facilities are included in retail electricity rates.

CEQA Guidelines section 15126.6(e) explains that the purpose of identifying the “no project” alternative “is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” In many cases, the “no project” alternative simply describes the circumstances under which the project does not proceed. This appears to be the approach taken in the Draft EIR/EIS. In other cases, however, the environmental consequences of not constructing the proposed project should be discussed:

If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Cal. Code Regs. tit. 14, § 15126.6(e)(3)(B). Once the no project alternative has been identified, CEQA requires the lead agency to “analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Cal. Code Regs. tit. 14, § 15126.6(e)(3)(C). Similarly, U.S. Department of the Interior NEPA regulations (which are applicable to the BLM) expressly provide that “[t]he analysis of the effects of the no-action alternative may be documented by contrasting the current condition and expected future condition should the proposed action not be undertaken with the impacts of the proposed action and any reasonable alternatives.” 43 C.F.R. § 46.415(b)(1). This is consistent with guidance from the Council on Environmental Quality (CEQ), which states:

[w]here a choice of “no action” by the agency would result in predictable actions by others, this consequence of the “no action” alternative should be included in the analysis. For example, if denial of permission to build a railroad to a facility would lead to construction of a road and increased truck traffic, the EIS should analyze this consequence of the “no action” alternative.

See CEQ, Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations, Question #3, 46 Fed. Reg. 18026 (1981).

Where, as here, non-approval will result in foreseeable environmental consequences, those consequences should be discussed. The Final EIR/EIS need only acknowledge the practical results of the No PROJECT alternative; neither CEQA nor NEPA demands a quantitative analysis.

The Draft EIR/EIS takes this approach in the analysis of the “No ECO Substation Project,” which finds:

“Under the No Project Alternative 2, the ECO Substation Project would not be built, and the conditions in the existing energy grid and local environment would remain. Without the ECO Substation Project, there would not be an interconnection hub that would enable renewable generation such as the ESJ Gen-Tie or Tule Wind projects to connect to the grid. Additionally,

energy transmission would remain unreliable in the Boulevard, Jacumba, and surrounding communities. Planned generation facilities in the project area would require additional miles of transmission line to reach an interconnection point and possibly multiple connection points on SDG&E's existing transmission system. In addition, new substations to be constructed by each generator might be required to connect the generation facilities to the grid.

(Draft EIR/EIS at E-12.)

And most importantly, the Draft EIR/EIS concludes that:

“Development of these facilities under the No ECO Substation Project Alternative (No Project Alternative 2) may actually increase impacts when compared to the ECO Substation Project, and therefore it was determined not to be environmentally superior.” (Emphasis added.)

(Draft EIR/EIS at E-12.)

The environmental consequences of not constructing *any* new renewable energy source in southeastern San Diego County are considerable and well-documented. These include continued and new reliance on fossil fuel fired generation and the associated GHG emissions, such as carbon dioxide (CO₂), that these carbon-based sources create. As the CEC stated in its *2009 Integrated Energy Policy Report*, renewable energy will “help achieve a significant portion of [CARB’s] target for GHG emission reductions from the electricity sector” and the RPS “is an essential tool to help the state reduce its GHG emissions.” CEC, *2009 Integrated Energy Policy Report*, CEC -100-2009-003-CMF, at 77 (Dec. 2009). The CEC finds that “[m]eeting RPS goals depends in large part on building new transmission lines to access remote renewable resources.” *Id.* at 26. Both the CPUC and the CEC have aggressively promoted renewable energy and recommended 33% renewables as a key to reducing GHG emissions that would otherwise be caused by fossil-fuel generation. See CPUC Decision D.08-10-037 in Rulemaking (R.) 06-04-009 (Oct. 2008) (decision representing joint effort by CPUC and CEC to recommend GHG regulatory strategies to CARB, including modeling that demonstrates significantly reduced GHG associated with renewable energy development, particularly on an accelerated basis); CEC, *Final Opinion on Greenhouse Gas Regulatory Strategies*, Docket No. 07-OII-1 (Oct. 28, 2008).

It is this area specifically that the Draft EIR/EIS understates the potential beneficial impacts on the environment associated with the “PROJECT” by understating the environmental consequences of the “No PROJECT” alternative. As noted above, one of the primary purposes of the ECO Substation Project is to create an interconnection hub for renewable generation along SDG&E’s existing SWPL transmission line, and indeed, a key basic purpose, need, and benefit of the various proposed renewable energy projects is to reduce reliance on fossil fuel generation. In reviewing the otherwise robust GHG analysis contained in the Draft EIR/EIS, while it recognizes that the proposed projects would decrease overall emissions attributable to electric generation in California,¹⁰ the Draft EIR/EIS fails to acknowledge the GHG

¹⁰ See Draft EIR/EIS at § D.18 (climate change) generally; D.18-16 (finding impacts less than significant (Class III) and stating: “[i]n addition, the [ECO] project would facilitate interconnection of renewable sources of energy, thereby potentially decreasing overall emissions attributable to electric generation in California.”); *id.* at D.18-18 (same finding with respect to the Tule Project and stating: “[i]n addition, the project would create a renewable sources of energy, thereby potentially decreasing overall emissions

benefits and consequences of *not* approving the PROJECT when it selects the No-Project Alternative 1 as the CEQA Environmentally Superior Alternative. Rather, the analysis states only that if the PROJECT is not built, “existing conditions would remain at these sites” and “Climate change impacts resulting from the Proposed PROJECT would not occur.” See Draft EIR/EIS at D.18-32 to 33. But less costly and more efficient renewable energy would be expected to displace fossil-fuel generation on the SWPL and as a result, less fossil fuel generation would result in less GHG emissions. SDG&E believes that the No Project analysis contained in the Draft EIR/EIS should be amplified to include a more robust recognition that if the ECO Substation Project and other projects are not approved, there will be no commensurate reduction of GHG emissions from other fossil-fuel power plants. See Draft EIR/EIS at D.18-32 to 34; *see also id.* at F-206 (discussing cumulative impacts of No Project Alternative 1; same); *id.* at 207 (finding under No Project Alternative 3 that while GHG would be reduced during construction if the Tule Wind project is not built, “it would also lose some of the GHG offsets attributable to such projects.”).

Prior CPUC, BLM and U.S. Forest Service CEQA and NEPA documents evaluate the beneficial effects of reduced GHG emissions due to decreased emissions from fossil-fuel fired power plants resulting from the development of renewable energy sources. By way of example, the Tehachapi Renewable Transmission Project Final EIS (September 2010) at pages 3.3-27 to 28 states that the No-Action Alternative assumes that existing transmission lines and power plants would continue to operate and that “[t]he forecast net decrease in emissions from power plants . . . would not occur with implementation of the No Project Alternative (CAISO, 2008).” It also finds (at pages 3.3-40 to 41), that “the Project’s purpose would implement key strategies for mitigating climate change proposed by the California Energy Commission and the IPCC to improve transmission and increase renewable energy use. Therefore, the Project would provide a beneficial GHG emissions impact.”¹¹ Similarly, the Desert Sunlight Solar Farm and Red Bluff Substation Draft EIR/EIS (August 2010) (at pages 4.5-35 to 36) acknowledge that under No-Action, “none of the benefits of the Proposed Project in displacing fossil fuel fired generation and reducing associated pollutant emissions would occur.” See *also id.* at 4.5-14 to 15 (greenhouse gas emissions avoided by displacing fossil fuel power generation); *id.* at 4.5-39 (cumulative analysis recognizing that action alternatives “would displace alternative power generation for SCE and PG&E, resulting in an indirect climate change benefit by avoiding future greenhouse gas emissions from alternative power generation facilities.”); Appendix D-5 (greenhouse gas emission avoided through

attributable to electric generation in California.”); *id.* at D.18-19 (same with respect to ESJ); *id.* at D.18-20 (“Over their lifespans, the individual ECO Substation, Tule Wind, and ESJ projects, as well as the Proposed PROJECT as a whole, would assist in the attainment of the state’s goals by utilizing a renewable source of energy that could displace electricity generated by fossil-fuel powered plants. The Proposed Project, along with the proposed Campo, Manzanita, and Jordan wind projects would therefore be consistent with state initiatives aimed at reducing GHG emissions, and impacts would therefore not be adverse.”).

¹¹ See *also* TRTP Final EIS at 3.3-33 to 35 (“Project indirect emissions are comprised of the Project’s impact on the transmission grid and operation of existing and forecast power plants. . . . Additionally, the proposed Project’s transmission of renewable energy is assumed to help impel an indirect emission decrease and an overall emissions decrease.”).

displacement of alternative power generation sources). Neither of these projects has identified or selected a No Project Alternative as environmentally superior.

SDG&E urges the CPUC and BLM to more fully consider the avoided GHG emissions associated with the proposed projects in the Final EIR/EIS, and believes that once consideration of these environmental benefits are more fully integrated into the environmental review process, the PROJECT will emerge as the environmentally superior alternative under CEQA.

THE ECO SUBSTATION PROJECT HAS BEEN MODIFIED TO INCORPORATE THE ENVIRONMENTALLY SUPERIOR ECO SUBSTATION PROJECT ALTERNATIVE

The Draft EIR/EIS identifies two categories of modifications that, taken together, will result in an environmentally superior alternative to the ECO Substation Project. These modifications include a shift in the location of the ECO Substation Project and the partial undergrounding of the proposed overhead 138 kV line. SDG&E has confirmed the feasibility of these changes and modified the Project to reflect these environmentally superior changes to the ECO Substation Project.¹² As a result, the ECO Substation Project will result in fewer impacts than previously identified in the Draft EIR/EIS.

These modifications to the ECO Substation Project, some of which were previously submitted to the CPUC on April 30, 2010 and October 7, 2010, are described in more detail in Attachment A – Updated Project Description and ECO Substation Alternative and should be reflected in the Final EIR/EIS.¹³

THE DRAFT EIR/EIS OVERSTATES THE ENVIRONMENTAL IMPACTS OF THE ECO PROJECT AND INCLUDES UNWARRANTED, INFEASIBLE OR DISPROPORTIONATE MITIGATION

The Draft EIR/EIS classifies several potential impacts of the ECO Substation Project as “Class 1: significant and unavoidable,” and recommends specific mitigation measures to address these impacts. SDG&E believes that in several instances, the analysis contained in the Draft EIR/EIS is unduly conservative, resulting in overstated environmental impacts and mitigation measures that are not warranted and in some cases not feasible. Under CEQA, mitigation measures must be “roughly proportional to the impacts of the project.” Cal. Code Regs. tit. 14, § 15126.4(a)(4)(B), citing *Dolan v. City of Tigard*, 512 U.S. 374 (1994). In addition, SDG&E believes that some of the proposed mitigation

¹² Although the Draft EIR/EIS identified a specific route for the segment of transmission line to be undergrounded, SDG&E has refined the “ECO Partial Underground 138 kV Transmission Route Alternative” described in the Draft EIR/EIS to more closely follow existing road alignment, improve engineering constructability and minimize impacts on biological resources. These refinements do not reduce the length of overhead line that will be undergrounded.

¹³ None of these changes trigger recirculation of the Draft EIR/EIS. Under CEQA, “Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” Cal. Code Regs. tit. 14, § 15088.5. Under NEPA, agencies are only required to supplement an EIS if there is a change in a proposed action or new information showing that the action will affect the quality of the human environment “in a significant manner or to a significant extent not already considered.” *Marsh v. Or. Natural Res. Council*, 490 U.S. 360, 374 (1980)(emphasis added).

measures should be revised or deleted to ensure consistency with prior CPUC precedent on comparable projects and to eliminate redundancy. Attachment B – Proposed Mitigation Measure Revisions identifies suggested revisions to the mitigation measures, together with the supporting rationale, that would address these concerns.

**ADDITIONAL TECHNICAL CORRECTIONS AND CLARIFICATIONS SHOULD BE
INCORPORATED INTO THE FINAL EIR/EIS TO REFLECT AN ACCURATE AND
COMPLETE ADMINISTRATIVE RECORD**

In addition to the foregoing comments, SD&GE has identified several technical corrections and clarifications that should be incorporated into the Final EIR/EIS to ensure an accurate and complete document. Those technical corrections and clarifications are identified in Attachment C – Technical Corrections and Clarifications.

**EVEN IF THE FINAL EIR/EIS CONCLUDES THAT THE ECO SUBSTATION PROJECT
RESULTS IN SIGNIFICANT UNMITIGABLE IMPACTS, SPECIFIC OVERRIDING
CONSIDERATIONS WARRANT APPROVAL OF THE ECO SUBSTATION PROJECT**

As discussed above and in the attached materials, the Draft EIR/EIS erroneously concludes that the ECO Substation Project will result in unavoidable significant impacts. Even if this conclusion were correct; however, “CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project.”¹⁴ Specific examples of the applicable benefits associated with the ECO Substation Project are detailed in Attachment D – Specific Overriding Considerations Associated with the ECO Substation Project.

RECIRCULATION IS NOT REQUIRED AS A MATTER OF LAW

SDG&E expects that opponents of one or more of the projects described in the Draft EIR/EIS, in an effort to cause delay and derail a timely decision on the Project, will argue that recirculation of the Draft EIR/EIS is required.

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.¹⁵ Importantly, “[n]ew information added to an EIR is not ‘significant’ unless the EIR is changed in 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’s proponents

¹⁴ Cal. Code Regs. tit. 14, § 15093.

¹⁵ *Id.* § 15088.5; *see also* 40 C.F.R. § 1502.9(c) (under NEPA’s regulations, agencies have a duty to prepare supplements to a final EIS only if: “(i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.”).

have declined to implement.”¹⁶ The California Supreme Court has confirmed that “Recirculation was intended to be an exception, rather than the general rule.”¹⁷ Thus, any decision to recirculate must not be taken lightly.

In the context of the ECO Substation Project, SDG&E does not anticipate that recirculation will be required as a legal matter. For example, none of the additional information contained in this letter constitutes “significant new information” such that recirculation under CEQA or supplementation under NEPA is required. Cal. Pub. Res. Code § 21092.1; Cal. Code Regs. tit. 14, § 15088.5(a). In addition, although responsible agencies may feel compelled to submit extensive comments on the adequacy of the Draft EIR/EIS under CEQA Guidelines section 15096 and may go so far as to request recirculation of the Draft EIR/EIS, recirculation is not triggered as a matter of law unless the definition of “significant new information” is met. See Cal. Code Regs. tit. 14, § 15088.5(a). Recirculation is not required simply because a responsible agency or any other party may claim inadequacies and requests a new document. *See id.*; *see also Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal.*, 6 Cal. 4th 1112, 1136-42 (1993) (a community group’s assertions that an EIR was inadequate and required recirculation did not demonstrate a need to address “significant new and information” and therefore did not trigger recirculation). The Final EIR/EIS can either address the issues raised in comments or can disagree with the comments submitted, even if those comments are from a responsible agency. *See* Cal. Code Regs. tit. 14, § 15088.5(b) (“Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”); *see also Marin Mun. Water Dist. v. KG Land Cal. Corp.*, 235 Cal. App. 3d 1652, 1667 (1991) (new, amplifying information that was not significant did not trigger recirculation).

More specifically, CEQA requires that “the major environmental issues raised when the lead agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.”¹⁸ CEQA does not compel resolution of concerns that are raised in comments, even if those concerns are raised by a responsible agency.

¹⁶ *Id.* § 15088.5(a)(emphasis added). Similarly, under NEPA, supplementation is not required even for a substantial modification to a project where the impacts were not significantly different from those already considered. *North Idaho Community Action Network v. U.S. Dep’t of Transp.*, 545 F.3d 1147, 1155 (9th Cir. 2008)). Thus, if an agency takes an action “‘qualitatively within the spectrum of alternatives that were discussed’ in a prior FEIS,” no supplemental EIS is necessary. *Missouri v. U.S. Army Corps of Eng’rs*, 516 F.3d 688, 693-94 (8th Cir. 2008)(citation omitted). The test, therefore, is whether the agency has already provided the public with sufficient information to permit “meaningful consideration” of the proposed action. *See Greater Yellowstone Coalition v. Larson*, 641 F. Supp. 2d 1120, 1150 (D. Idaho 2009); 40 C.F.R. § 1502.1 (EIS “shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.”).

¹⁷ *Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal.*, 6 Cal. 4th 1112, 1132 (1993).

¹⁸ Cal. Code Regs. tit. 14, § 15088.

More importantly, any “voluntary” recirculation is wholly inappropriate for several reasons. First, as discussed previously, the Draft EIR/EIS conservatively overstates the potential environmental impacts associated with the ECO Substation Project. It includes *project-level* analysis of two other cumulative projects (e.g., Tule and ESJ) and *programmatic-level* analysis of three other projects and identifies these impacts as a consequence of the ECO Substation Project. Neither CEQA nor NEPA compel this level of analysis of cumulative projects. Nonetheless, the over-inclusive approach to “connected actions” and the “whole of the action” taken by the Draft EIR/EIS results in an overstatement of the potential impacts that defeats any claim of recirculation because the presence and severity of “significant and unavoidable” impacts in several areas¹⁹ have already been identified and disclosed to the public. Therefore, the public has not been deprived of a meaningful opportunity to comment upon “a substantial adverse environmental effect of the project”.

Project opponents may argue that recirculation is required to account for new information regarding the Campo, Manzanita, or Jordan wind projects, for which the Draft EIR/EIS is a “program” EIR.²⁰ However, new detail on a project’s design or features that does not constitute “significant new information” does not trigger recirculation. To illustrate, the California Court of Appeal recently upheld the certification of an EIR for an athletic center and several other related projects at the UC Berkeley campus.²¹ The Court rejected claims that recirculation was required in light of a seismic study and agency correspondence that was not included in the final EIR and that additional detail about future projects should have included in the final EIR. By extension, if, for example, additional details were to become available about any of the projects discussed in the Draft EIR/EIS at the programmatic level (*i.e.*, the Campo, Manzanita, or Jordan wind projects), recirculation would not be required and in fact would run counter to CEQA. *See California Oak Foundation*, 188 Cal.App.4th at 271-272 (“CEQA permits a lead agency to use ‘tiering’ to ‘defer analysis of certain details of later phases of long-term linked or complex projects until those phases are up for approval...’” (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal.4th 412 (2007) at 431). The *California Oak*

¹⁹ The Draft EIR/EIS identifies the presence and severity of significant and unavoidable impacts associated with all of the projects described in the Draft EIR/EIS in the areas of biological resources, visual resources, cultural resources, noise, air and fire risk.

²⁰ The fact that the Draft EIR/EIS is not labeled a “program” EIR is irrelevant. *See California Oak Foundation v. The Regents of the University of California*, 188 Cal. App. 4th 227, 271 n.25 (2010) (rejecting argument challenging project description and holding that “[t]he fact that this EIR is labeled a “project” rather than a “program” EIR matters little for purposes of this inquiry. “The level of specificity of an EIR is determined by the nature of the project and the ‘rule of reason’ [citing *Laurel Heights I*], rather than any semantic label accorded to the EIR.” [citing *Al Larson*, 18 Cal.App. 4th at 741-742]).

²¹ *California Oak Foundation v. the Regents of the University of California*, 188 Cal. App. 4th 227 (2010). The California Court of Appeal has also held that an EIR studying a water district’s moratorium on water hookups did not require recirculation in light of detail from a newly released master water supply plan that the moratorium would last 10 years. *See, e.g., Marin Mun. Water Dist. v. KG Land Cal. Corp.*, 235 Cal. App. 3d 1652, 1667-68 (1991). The EIR had already stated that the moratorium could last more than 5 or 6 years, and the additional detail pegging the moratorium at 10 years did not constitute “significant new information.” *Id.*

Foundation court found further that: “In particular, tiering is appropriate ‘when it helps a public agency to focus upon the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports.’”) (quoting *In re Bay-Delta*, 43 Cal.4th at 1170). It thus concluded: “Further, where an EIR covers several possible projects that are diverse and geographically dispersed, the agency has discretion to evaluate the potential environmental impacts of the individual projects in general terms in the EIR, while deferring more detailed evaluation of the projects for future EIR’s.” *California Oak Foundation*, 188 Cal.App.4th at 271-272 (citing *In re Bay-Delta*, 43 Cal.4th at 1170-1171 and CEQA Guidelines §15165.). Moreover, although SDG&E questions the feasibility, necessity and proportionality of several mitigation measures in the Draft EIR/EIS, SDG&E has not declined to implement any feasible mitigation measures or alternatives and in fact has agreed to construct the environmentally superior ECO Substation Alternative. Therefore, the public has not been deprived of a meaningful opportunity to comment upon “a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

As noted at the beginning of this letter, the Draft EIR/EIS is the product of well over a year of analysis and consideration by multiple federal, state, and local agencies. In the more than 18 months since the application (which included a detailed Proponent’s Environmental Assessment) was originally filed, the preparation and release of the Draft EIR/EIS been delayed to incorporate additional information about other projects considered in the document. The generous 54-day period originally announced to allow for public comments on the Draft EIR/EIS was extended to 70-days in an effort to maximize public review and comment.

In the context of this long procedural history, any additional delay caused by unnecessary recirculation will *impede* the CPUC and BLM’s ability to meet renewable energy policy objectives.

Attachment A – Updated Project Description and ECO Substation Alternative Site

East County Substation Project Draft EIR-EIS



San Diego Gas & Electric Company (SDG&E) submitted its Proponent’s Environmental Assessment (PEA) for the East County (ECO) Substation Project (Proposed Project) to the California Public Utilities Commission (CPUC) on August 11, 2009. Subsequent to filing the PEA, modifications to the 138 kilovolt (kV) transmission line were made to the Proposed Project, including minor shifts to some pole locations and installation method, the addition of permanent maintenance pads around pole sites, and a change to the transmission line structure configuration. Limited portions of the 138 kV transmission line and associated access roads were also changed to reduce impacts to sensitive resources. These initial changes to the Proposed Project that was described in the PEA were submitted to the CPUC in the document titled Revised East County Substation Footprint Project Description on April 30, 2010. A description of these changes follows under the heading Changes to the Proposed Project on page 2 of this document.

Changes were also made to the ECO Substation footprint, which is included in the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) as the ECO Substation Alternative Site. These additional modifications were submitted to the CPUC in the document Southern Access Road Description and Impacts on October 7, 2010, and were made to further avoid and/or reduce impacts to previously unidentified cultural and hydrological resources. These modifications primarily included changes to access roads, pad sizes, and retention basins at the shifted ECO Substation site. In addition, the feeder line loop-in connecting the ECO Substation to the existing 500 kV Southwest Powerlink (SWPL)¹ and limited portions of the 138 kV transmission source line² and associated access roads were also slightly altered to adjust for the 700-foot shift made to the ECO Substation. Figure 1: Revised ECO Substation Footprint and Southern Access Road, provided in Southern Access Road Description and Impacts, depicts the changes made to the ECO Substation Alternative Site. A description of the changes made to the ECO Substation Alternative Site also follows under the heading Changes to the ECO Substation Alternative Site. Since submittal of these documents, SDG&E has further refined the design of the ECO Substation, which has included revisions to the retention basin, construction buffers, and temporary work areas. These additional changes are described herein under the heading February 2011 ECO Substation Revisions.

The ECO Partial Underground 138 kV Transmission Route Alternative identified in the Draft EIR/EIS provides that the segment of the 138 kV transmission line beginning at milepost 9 would travel underground to the rebuilt Boulevard Substation following the same alignment as the proposed overhead line. To the extent feasible, SDG&E has refined the partial underground alignment to be located within existing roads to avoid identified sensitive resources. A description of SDG&E’s preliminary design is provided in this document under the heading Preliminary Partial Underground Design. Additionally, rerouting of the distribution lines that

¹ The SWPL loop-in is also more specifically referred to as a substation feeder line loop-in in some ECO Substation Project documents.

² The terminology used to describe “138 kV transmission ‘source’ or ‘supply’ line” as used herein and in some ECO Substation Project documents specifically designates a ‘power line’ used to provide electric power to a substation. Pursuant to GO 131-D, Section I, a ‘power line’ is defined as a line designed to operate between 50 and 200kV.

Attachment A – Updated Project Description and ECO Substation Alternative Site

East County Substation Project Draft EIR-EIS



connect to the existing Boulevard Substation will be required to connect to the rebuilt Boulevard Substation. A description of the rerouting requirements follows under the heading Boulevard Substation Rebuild Distribution Line Reroutes.

Collectively, these documents describe the preferred Project for SDG&E—which is essentially the ECO Substation Alternative Site combined with the Partial Underground 138 kV Transmission Line Alternative described in the Draft EIR/EIS—and describe the minor modifications SDG&E has made to avoid sensitive resources. These modifications need to be included within the Project Description and Alternatives sections of the Final EIR/EIS.

The revisions made to the Proposed and Alternative ECO Substation Projects, as described in the Draft EIR/EIS, will result in fewer impacts to cultural resources and drainages in the Proposed Project area, as shown in Table A-1: Revised Impacts Resulting from Project Revisions. In addition, steel poles (SP) 77, 91, and 99 were moved so that they are no longer in the vicinity of archaeological sites SDI-7051, SDI-7951, and SDI-7055. Thus, the cultural resources within the substation footprint include only the following:

- SDI-7074
- SDI-7082
- SDI-19618
- SDI-19619H
- SDI-19621H
- SDI-19622H
- SDI-19626
- SDI-19479
- SDI-19483

Although the transmission line has the potential for impacts within the mapped portions of SDI-7951, SDI-7051, and SDI-7059, ground disturbance will be within insignificant areas of these sites because poles, pads, and roads were moved to avoid artifact concentrations. The southern access road may impact historic artifacts associated with sites SDI-20168H and SDI-20169H, but these impacts will not be significant because these small historic sites do not contain the quantity or diversity of artifacts to be eligible for the National Register.

Impacts to United States (U.S.) Army Corps of Engineers (USACE)- and Regional Water Quality Control Board (RWQCB)-jurisdictional waters were also reduced as a result of changes made to the ECO Substation, as shown in Table A-1: Revised Impacts Resulting from Project Revisions.

A specific description of the revisions made to the Proposed Project and ECO Substation Alternative that need to be included within Project Description, Alternatives, and Impact Analyses sections of the Final EIR/EIS follows.

Table A-1: Revised Impacts Resulting from Project Revisions

Modification	Cultural Resources	Jurisdictional Drainages
ECO Substation footprint shifted 700 feet east	SDI-2720, SDI-6115, and SDI-7079 avoided	0.25 acre of drainages avoided
ECO Substation main access road modified to enter the substation at the southern rather than northern border	SDI-21068H, SDI-20169H, and SDI-6119 impacted (SDI-6119 was determined to not be significant during testing for the Energia Sierra Juarez Project)	0.02 acre of drainages avoided
Removal of the ECO Substation northwest corner	No Change	0.02 acre of drainages avoided
Revisions to the size and location of the retention basins	No Change	0.16 acre of drainages avoided
Revisions to the access road to SPs 108 and 108A	No Change	<0.01 acre of drainages avoided
SPs 104 and 105 were moved approximately 40 and 90 feet west from their originally proposed locations, respectively	SDI-7060 avoided	No change
SP 76 and 77 were moved approximately 10 feet south and 75 feet west of their originally proposed locations, respectively	SDI-7951 avoided	No change
SP 102 was moved approximately 195 feet west and 3 feet south	SDI-7059 avoided	No change

Changes to the Proposed Project

- SPs 77, 104, and 105 have been shifted approximately 75, 40, and 90 feet west from their originally proposed locations to avoid sensitive cultural resources.
- The configuration of the 138 kV line has been revised from an I-string twin-circuit to a V-string bundled single-circuit design to account for standards associated with high winds and fire in the Proposed Project area.
- The height of the steel cable riser pole has been increased from approximately 140 feet to 150 feet.
- The maximum height of the SPs will now measure approximately 150 feet, rather than 115 feet, as described in the Draft EIR/EIS, and will average approximately 130 feet. Additionally, the SPs will be installed on drilled-pier foundations, as opposed to being direct buried, to account for the height increase.
- The 98 SPs accounted for in the Draft EIR/EIS will now require permanent, rather than temporary, maintenance pads, each measuring approximately 80 feet by 60 feet in size.

Changes to the pole locations and required grading activities within the 138 kV transmission line, as well as the addition of the permanent maintenance pads for each pole site will result in temporary and permanent impacts to vegetation that differ from the totals provided in the Draft EIR/EIS. Table A-2: Native Vegetation Community Temporary and Permanent Impacts provides temporary and permanent impacts to vegetation communities on Bureau of Land Management (BLM) and privately owned land for the Proposed Project.

Changes to the ECO Substation Alternative Site

The ECO Substation Alternative Site described in the Draft EIR/EIS is the preferred alternative for the ECO Substation location. The basis for this alternative is to decrease impacts to cultural and hydrological resources. The changes are a result of shifting the footprint of the ECO Substation approximately 700 feet east of the originally proposed location, and are described in further detail as follows:

ECO Substation

- The northwest corner of the western ECO Substation pad was removed to reduce permanent impacts to waters of the U.S. by approximately 0.2 acre.

Table A-2: Native Vegetation Community Temporary and Permanent Impacts

Native Vegetation Community	Existing Acreage in Study Area	Temporary Impact Acreage		Permanent Impact Acreage		ECO Substation Project Total Impact Acreage
		BLM Land	Private Land	BLM Land	Private Land	
Chamise chaparral/redshank chaparral	302.92	0.00	5.92	0.00	9.46	15.38
Emergent wetland	2.50	0.00	0.00	0.00	0.00	0.00
Oak woodland	6.46	0.00	0.82	0.00	0.00	0.82
Peninsular juniper woodland and scrub	193.34	0.00	34.76	0.70	83.14	118.60
Shadscale scrub	16.45	0.00	2.46	0.00	0.31	2.77
Sonoran mixed woody succulent scrub (Mixed desert scrub)	548.52	0.00	14.00	1.41	23.26	38.67
Southern willow scrub/mulefat scrub (Riparian scrub)	6.95	0.00	0.10	0.00	0.15	0.25
Total	1,077.14	0.00	58.06	2.11	116.32	176.49

- The design of the main access road to the ECO Substation was revised to reduce impacts to USACE-jurisdictional waters. Originally, the ECO Substation was to be accessed by improving an existing dirt road that connects to Old Highway 80, and then extending that road to the northern side of the substation. The newly proposed access road (southern access road) will involve expanding and improving an existing dirt road, originating from Old Highway 80, approximately 500 feet west of the original access road. From Old Highway 80, the road travels southeast for approximately 1,800 feet, turns east for approximately 1,700 feet, and then turns north for approximately 300 feet until reaching the southern side of the ECO Substation. The dimensions of the new southern access road will measure approximately 3,800 feet long and impact an average width of 60 feet, which includes a 30-foot paved road, 1-foot shoulders, drainage structures, and slopes, as opposed to the originally proposed 2,900-foot-long, 30-foot-wide northern access road. Permanent impacts resulting from the access road will measure approximately 4.95 acres, rather than 2.2 acres, as described in the Draft EIR/EIS.
- The footprint shift of the ECO Substation, removal of the northwest corner of the substation's pad, and relocation of the main access road to the south resulted in modification of the revised basin design from that provided in the ECO Substation Alternative Site description. The basin's location, as described in the Draft EIR/EIS, would have been along the northwest and western side of the ECO Substation, and would have measured approximately 2.41 acres. As revised, the basin is located along the southwestern edge of the ECO Substation, and measures approximately 1.0 acre. Further refinement required for the retention basin is described in the following section, February 2011 ECO Substation Revisions.
- Two ECO Substation Staging Yards described in the PEA were originally proposed to be located northwest of the ECO Substation and measure approximately 1.00 acre each in size. SDG&E later determined that power would be provided to the staging yards through use of on-site generators, rather than through a tap into an existing 12 kV distribution line, and that only one staging yard was required. The revised site of the staging yard is now proposed to be located south of the substation, near where the southern access road meets the substation driveways, and would measure approximately 0.54 acre in size. However, it has been determined that one of the northern staging yards will be required, as described in the following section, February 2011 ECO Substation Revisions. Temporary power will be brought to the southern staging yard by either on-site generators or a tap of an existing distribution line from the north staging yard. The route of the temporary distribution line would extend to the southern staging yard such that poles would be placed within previously disturbed access roads and within the temporary construction limits of the ECO Substation.

SWPL Loop-In

- As a result of shifting the ECO Substation footprint, five three-pole dead-end structures and one H-frame tangent structure (SD1 through SD6) will comprise the SWPL loop-in, rather than four lattice structures, as described in the Draft EIR/EIS.
- The western interconnection will comprise two structures, as originally proposed, though their locations have been shifted approximately 1,200 feet east of the location described in the Draft EIR/EIS.
- The eastern interconnection will be comprised of four, rather than two structures, as originally proposed, and the four structures have been shifted approximately 2,000 feet east of their originally proposed locations.
- The overall length of the feeder line loop-in interconnecting the ECO Substation to the SWPL will be approximately 3,065 feet.
- The height of the structures will remain the same as originally proposed, but the distance from the ground to the lowest conductor will measure approximately 42 feet, as opposed to the 35 feet described in the Draft EIR/EIS.
- New permanent dirt access roads will be constructed from the SWPL right-of-way (ROW) to the six SWPL loop-in structures. These new access roads will measure approximately 20 feet wide and will total approximately 1,932 feet in length, rather than 1,700, as provided in the Draft EIR/EIS. The new total acreage for the SWPL loop-in access roads and required grading outside of the access road area will measure approximately 1.19 acres, as opposed to 0.79 acres described in the Draft EIR/EIS.
- Permanent maintenance pads will be required for each of the six SWPL loop-in structures. The area of these pads and other associated grading will total approximately 2.56 acres, rather than the 1.6 acres described in the Draft EIR/EIS for the four originally proposed structures.
- The seven pull sites, measuring approximately 2.42 acres, will be located east of the ECO Substation, rather than within the substation footprint and the SWPL loop-in work areas, as described in the Draft EIR/EIS.

138 kV Transmission Line

- Three 138 kV transmission line SPs—106, 107, and 108—have been shifted approximately 100 feet east as a result of the ECO Substation footprint shift. Also, installation of one additional SP (108A) will be required due to the footprint shift. SP 108A will be located approximately 150 feet west of the western side of the ECO

Substation. Thus, the total number of SPs will be increased from 98, as described in the Draft EIR/EIS, to 99.

- One additional maintenance pad, measuring approximately 0.01 acre in size, will be required due to the addition of SP 108A.
- Four new, permanent dirt access roads will be constructed for SPs 106, 107, 108, and 108A. As provided in the Draft EIR/EIS, the area of these access roads would total approximately 0.24 acre. This number will be increased by less than 0.10 acre for the access road leading to SPs 108 and 108A, which will be located along the western edge of the ECO Substation, travel along the top of the retention basin, and then turn west to SP 108 and 108A.
- Only one approximately 100-foot by 100-foot pull site will be required for SP 106, as opposed to the two described in the Draft EIR/EIS.
- The fly yard located near SP-36 was shifted slightly to the west to avoid impacts to drainage features as depicted in Attachment A: Detailed Route Map 7 of 11 in Revised 138 Kilovolt Transmission Line Vegetation and Drainage Impacts, which was submitted to the CPUC on May 14, 2010.

Changes to the design of the ECO Substation footprint, SWPL loop-in, and associated access roads and grading activities will result in temporary and permanent impacts to vegetation that differ from the totals provided in the Draft EIR/EIS. Table A-3: Native Vegetation Communities Impacts for the ECO Substation Alternative Site provides the anticipated temporary and permanent impacts to vegetation communities anticipated to result from construction of the ECO Substation Alternative Site, and compares the impacts to those for the Proposed Project. Table A-4: Jurisdictional Drainage Impacts compares the impacts to drainages per jurisdictional agency for the ECO Substation Project and the ECO Substation Alternative Site.

February 2011 ECO Substation Revisions

Slight modifications to the ECO Substation design were made in February 2011 for the ECO Substation Alternative Site, which is the preferred alternative location for the substation. These modifications include the addition of a staging yard north of the ECO Substation, as well as minor changes to the construction buffer and retention basin. The revisions are depicted in Figure A-1: February 2011 ECO Substation Design. New vegetation impact totals resulting from these revisions are reflected in Table A-5: Native Vegetation Community Impacts for the February 2011 Revisions, while impacts to drainages are shown in Table A-6: Jurisdictional Drainage Impacts.

Attachment A – Updated Project Description and ECO Substation Alternative Site
 East County Substation Project Draft EIR-EIS



Table A-3: Native Vegetation Communities Impacts for the ECO Substation Alternative Site

Native Vegetation Community	Existing Acreage in Study Area	Temporary Impact Acreage		Permanent Impact Acreage		ECO Substation Alternative Total Impact Acreage	ECO Substation Project Total Impact Acreage
		BLM Land	Private Land	BLM Land	Private Land		
Chamise chaparral/redshank chaparral	302.92	0.00	5.92	0.00	9.46	15.38	15.38
Emergent wetland	2.50	0.00	0.00	0.00	0.00	0.00	0.00
Oak woodland	6.46	0.00	0.82	0.00	0.00	0.82	0.82
Peninsular juniper woodland and scrub	193.34	0.00	11.04	0.70	53.01	64.75	118.60
Shadscale scrub	16.45	0.00	2.46	0.00	0.31	2.77	2.77
Sonoran mixed woody succulent scrub (Mixed desert scrub)	548.52	0.00	16.32	1.41	48.98	66.71	38.67
Southern willow scrub/mulefat scrub (Riparian scrub)	6.95	0.00	0.10	0.00	0.15	0.25	0.25
Total	1,077.15	0.00	28.32	2.11	127.01	150.68	183.45

Table A-4: Jurisdictional Drainage Impacts

Jurisdictional Impacts		ECO Substation Project		ECO Substation Alternative Site	
		BLM Land	Private Land	BLM Land	Private Land
USACE/RWQCB-Jurisdictional Drainage Impacts	<i>Temporary</i>	0.02 acre	0.37 acre	0.02 acre	0.21 acre
	<i>Permanent</i>	0.01 acre	0.92 acre	0.01 acre	0.52 acre ³
CDFG-Jurisdictional Drainage Impacts	<i>Temporary</i>	0.04 acre	1.18 acres	0.04 acre	0.87 acre
	<i>Permanent</i>	0.02 acre	2.79 acres	0.02 acre	1.88 acre

The changes are summarized as follows:

- The ECO Substation Staging Yard that was originally proposed to be located north of the ECO Substation in the PEA, and was later removed from the ECO Substation Alternative Site design, will again be utilized for staging construction, in addition to the previously added southern staging yard. However, the northern yard will now measure approximately 0.36 acres. Power to the northern staging yard will be provided by an on-site generator and/or a temporary distribution line, as described in the Project Description of the Draft EIR/EIS. In order to tap the existing distribution circuit, approximately eight temporary wooden poles will be installed. This temporary tap will be used to power the construction trailer and equipment used at the staging area.
- As described in the previous section—Changes to the ECO Substation Alternative Site—the retention basin for the ECO Substation was modified from 2.41 acres to measure approximately 1.00 acre in size, and the location was shifted from the northwest and western portion of the substation to the western and southwestern edge. Minor modifications have since been made to the retention basin design to better ensure proper drainage from the ECO Substation. From this revision, the retention basin will now measure approximately 1.46 acres at the bottom; the basin has sloped sides and will measure approximately 3.95 acres from the edge of the pad to the top of the slopes. The basin is still located along the western and southwestern edge of the substation, but is slightly broader along the southwestern corner.

³ Through prior consultation with the USACE, SDG&E and the USACE determined that two distinct “single and complete projects” exist for the Proposed Project pursuant to 33 C.F.R. § 330.2(i). Thus, SDG&E is applying for two Nationwide Permit (NWP) 12s, divided at SP-85 within the Bornt Farms agricultural fields.

Attachment A – Updated Project Description and ECO Substation Alternative Site
 East County Substation Project Draft EIR-EIS



Table A-5: Native Vegetation Community Impacts for the February 2011 Revisions

Native Vegetation Community	Existing Acreage in Study Area	Temporary Impact Acreage		Permanent Impact Acreage		February 2011 Revisions Total Impact Acreage	ECO Substation Alternative Site Total Impact Acreage	ECO Substation Project Total Impact Acreage
		BLM Land	Private Land	BLM Land	Private Land			
Chamise chaparral/redshank chaparral	302.92	0.00	5.89	0.00	9.46	15.38	15.38	15.38
Emergent wetland	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oak woodland	6.46	0.00	0.82	0.00	0.00	0.82	0.82	0.82
Peninsular juniper woodland and scrub	193.34	0.00	11.22	0.70	53.99	65.21	64.75	118.60
Shadscale scrub	16.45	0.00	2.46	0.00	0.31	2.77	2.77	2.77
Sonoran mixed woody succulent scrub (Mixed desert scrub)	548.52	0.00	17.72	1.41	51.20	70.33	66.71	38.67
Southern willow scrub/mulefat scrub (Riparian scrub)	6.95	0.00	0.10	0.00	0.15	0.25	0.25	0.25
Total	1,077.14	0.00	38.21	2.11	115.11	154.76	150.68	176.49



Table A-6: Jurisdictional Drainage Impacts

Jurisdictional Impacts		ECO Substation Project		ECO Substation Alternative Site		ECO Substation February 2011 Revisions	
		BLM Land	Private Land	BLM Land	Private Land	BLM Land	Private Land
USACE/RWQCB-Jurisdictional Drainage Impacts	<i>Temporary</i>	0.02 acre	0.37 acre	0.02 acre	0.21 acre	0.02 acre	0.43 acre
	<i>Permanent</i>	0.01 acre	0.92 acre	0.01 acre	0.52 acre ⁴	0.01 acre	0.52 acre ⁵
CDFG-Jurisdictional Drainage Impacts	<i>Temporary</i>	0.04 acre	1.18 acres	0.04 acre	0.87 acre	0.04 acre	1.19 acre
	<i>Permanent</i>	0.02 acre	2.79 acres	0.02 acre	1.88 acre	0.02 acre	1.90 acre

⁴ Through prior consultation with the USACE, SDG&E and the USACE determined that two distinct “single and complete projects” exist for the Proposed Project pursuant to 33 C.F.R. § 330.2(i). Thus, SDG&E is applying for two Nationwide Permit (NWP) 12s, divided at SP-85 within the Bornt Farms agricultural fields.

⁵ Through prior consultation with the USACE, SDG&E and the USACE determined that two distinct “single and complete projects” exist for the Proposed Project pursuant to 33 C.F.R. § 330.2(i). Thus, SDG&E is applying for two Nationwide Permit (NWP) 12s, divided at SP 85 within the Bornt Farms agricultural fields.

- The construction buffer surrounding the perimeter of the ECO Substation, southern staging yard, and the southern access road has been revised based upon the changes made to the retention basin and refined engineering data. The expansion of the buffer along the south side of the ECO Substation and along the southern access road will increase the temporary buffer from approximately 17.8 acres to approximately 19.5 acres.

Preliminary Partial Underground Design

In order to assess the potential impacts to biological, cultural, and hydrological resources from the partial underground portion of the Project, field surveys of the area were conducted in February 2011. From the results of these surveys, SDG&E prepared a feasible preliminary design of the underground section of the Partial Underground Alternative, which is depicted in the attached Figure A-3: Preliminary Underground Alignment Drawing. Based on this preliminary design, the overhead portion of the 138 kV transmission line would transition to an underground configuration at two new riser poles located within the same permanent pole work area previously designed for steel pole 38. From these two new riser poles, two parallel duct banks separated by up to 20 feet would be installed typically within or directly adjacent to existing roads in the area. The duct banks would measure approximately 4.1 miles long and each would pass through approximately 11 vaults before terminating at the Boulevard Substation. The duct banks would be installed using the direct trenching method of construction in all but two locations. An approximately 690-foot-long segment would be installed using the horizontal directional drilling method to cross under a large jurisdictional feature and an approximately 280-foot-long segment would be installed using the jack-and-bore method to cross under an existing San Diego & Arizona Eastern railroad.

Two alternatives for entering the Boulevard Substation Rebuild have been identified. The proposed alignment would enter the Boulevard Substation Rebuild parcel at the southwest corner, follow the parcel's southern and eastern perimeter, then turn west to terminate at the substation. An alternative alignment would enter the parcel at the same location and continue northeast before entering the substation at its southern border.

The impacts of the underground alignment were then determined based on a worst-case scenario (since there are two alternative routes into the substation as depicted in Figure A-3: Preliminary Underground Alignment Drawing that are substantially similar). As demonstrated in Table A-7: Preliminary Partial Underground Impacts, these impacts would not be substantial and would not therefore be significant.

Boulevard Substation Rebuild Distribution Line Reroutes

Rerouting of the distribution lines that currently enter and exit the existing Boulevard Substation will be required to connect the rebuilt Boulevard Substation to existing systems, as shown in Figure A-2: Boulevard Substation Rebuild Distribution Map. The proposed distribution reroute would exit the west side of the rebuilt Boulevard Substation through an underground duct bank carrying multiple distribution cables. At approximately 25 feet west of the existing fence line,

Attachment A – Updated Project Description and ECO Substation Alternative Site

East County Substation Project Draft EIR-EIS



the underground bank would turn north for approximately 80 feet and enter an approximately 21-foot-long by 9-foot-wide by 14-foot-deep underground vault. From the underground vault, the duct bank would continue to head north for approximately 40 feet, then travel west to cross under an engineered drainage channel before terminating at a new riser pole.

The underground duct would measure approximately two feet wide, and would require a six-foot-wide ROW centered on the alignment. The duct would travel from the western edge of the rebuilt Boulevard Substation to the new riser pole, a total of approximately 164 feet excluding the underground vault, with the total permanent area required for the duct package measuring approximately 984 square feet. The underground vault would require a permanent two-foot-wide ROW on all sides, for a total area of approximately 325 feet (25 feet by 13 feet). The new riser pole would replace an existing distribution pole located approximately 280 feet south of Old Highway 80, and would require a permanent workspace of approximately 100 square feet. Thus, the total permanent impacts resulting from the proposed distribution reroute would total approximately 1,409 square feet.

The alternative distribution reroute would travel in essentially the same alignment as the proposed reroute, but would exit the rebuilt Boulevard Substation at a location approximately 40 feet north of the proposed underground route. All other components for the alternative reroute would be the same as for the proposed distribution reroute. Therefore, the total area required for the alternative route would measure approximately 1,169 square feet. The proposed and alternative methods of rerouting the distribution lines to connect to the existing system are depicted in Figure A-2: Boulevard Substation Rebuild Distribution Map.

**Attachment A – Updated Project Description and ECO Substation Alternative Site
East County Substation Project Draft EIR-EIS**



Table A-7: Preliminary Partial Underground Impacts

Native Vegetation Community	Existing Acreage in Study Area	Preferred Partial Underground Route				Alternative Partial Underground Route			
		Temporary Impact Acreage		Permanent Impact Acreage		Temporary Impact Acreage		Permanent Impact Acreage	
		BLM Land	Private Land	BLM Land	Private Land	BLM Land	Private Land	BLM Land	Private Land
Chamise chaparral/redshank chaparral	302.92	0.00	2.14	0.00	5.56	0.00	2.14	0.00	5.56
Emergent wetland	2.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oak woodland	6.46	0.00	0.02	0.00	0.00	0.00	0.02	0.00	0.00
Peninsular juniper woodland and scrub	193.34	0.00	11.22	0.70	54.69	0.00	11.22	0.70	54.69
Shadscale scrub	16.45	0.00	2.46	0.00	0.31	0.00	2.46	0.00	0.31
Sonoran mixed woody succulent scrub (Mixed desert scrub)	548.52	0.00	17.72	1.41	52.61	0.00	17.72	1.41	52.61
Southern willow scrub/mulefat scrub (Riparian scrub)	6.95	0.00	0.10	0.00	0.15	0.00	0.10	0.00	0.15
Big Sagebrush	30.4	0.00	0.28	0.00	0.09	0.00	0.28	0.00	0.08
USACE/RWQCB-jurisdictional drainages	12.82	0.02	0.31	0.01	0.70	0.02	0.31	0.01	0.71
CDFG-jurisdictional drainages	25.58	0.04	0.82	0.02	2.10	0.04	0.82	0.02	2.11

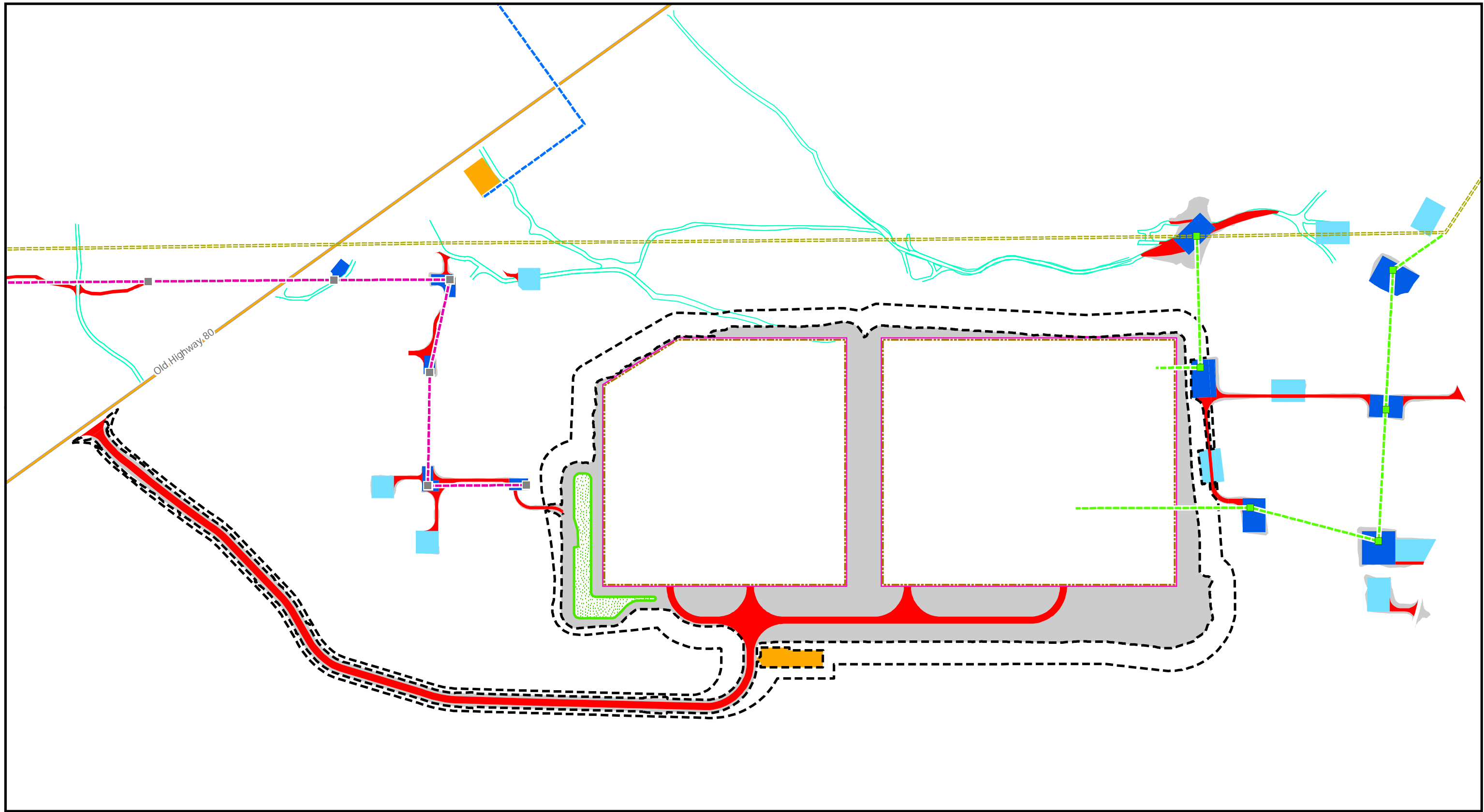


Figure A-1: February 2011 ECO Substation Design

East County Substation Project

Proposed SWPL Loop-In	Proposed 138 kV Line	Proposed 12 kV Temporary Distribution Tap	445 Circuit Collocated with 138 kV Line	Existing Transmission Line	Proposed ECO Substation	Fence Line	Temporary Construction Area	Access Road	Pole Work Area	Pull Site	Retention Basin	Staging Yard	Grading	Proposed SWPL Loop-In Structure	Proposed 138 kV Tower	Major Road	Existing Access Road
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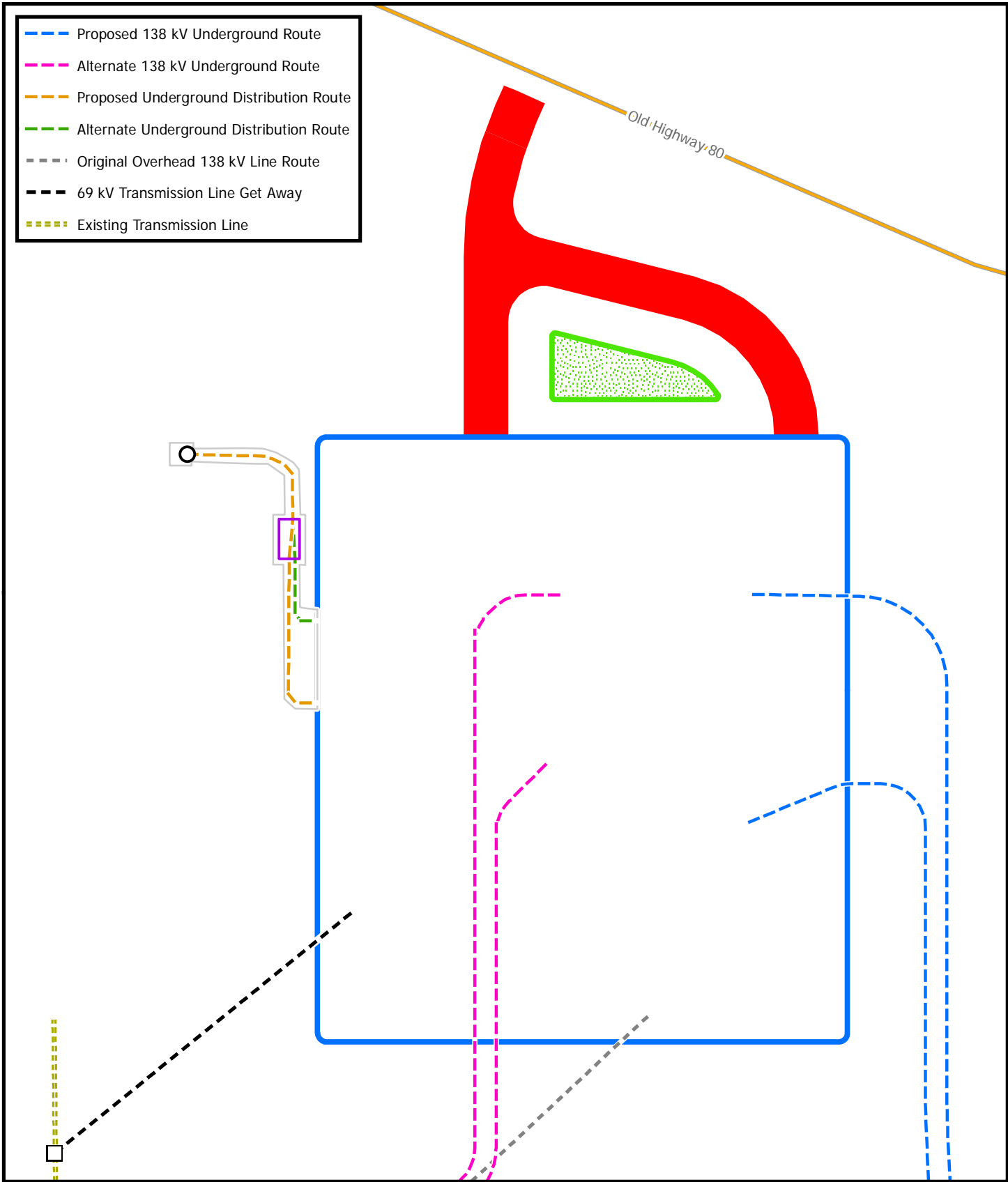


Figure A-2: Boulevard Substation Rebuild Distribution Drawing

East County Substation Project

Permanent ROW	Boulevard Substation Rebuild	SDGE A Sempra Energy utility	NSIGNIA ENVIRONMENTAL	
Vault	Boulevard Retention Pond	1:900		
New Riser Pole	Boulevard Access Road			
69 kV Transmission Line Get Away Pole	Major Road	0 25 50 100 150 200 Feet		

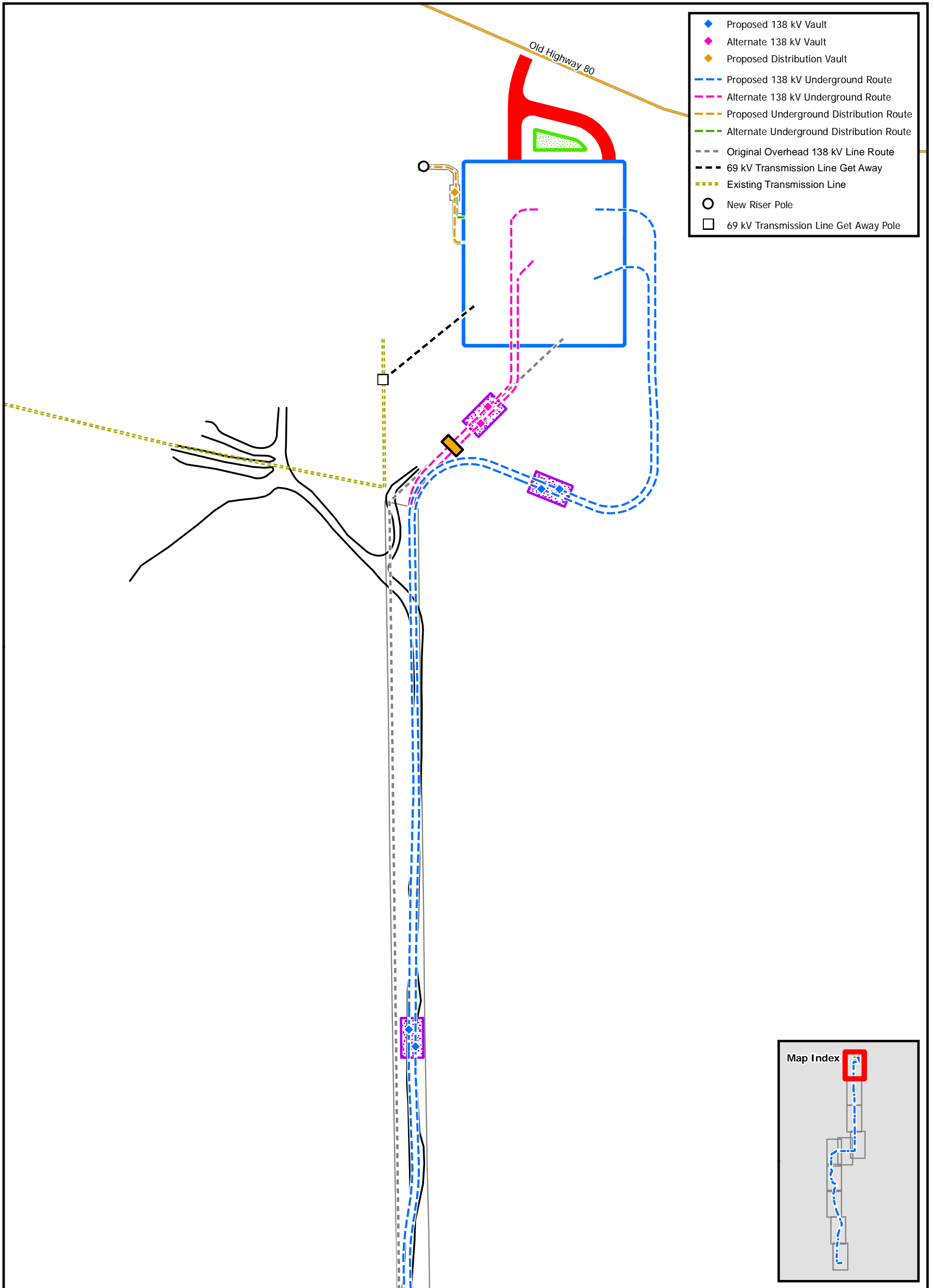


Figure A-3: Preliminary Underground Alignment Drawing 1 of 10

East County Substation Project

- Permanent ROW
- Road Grading
- Boulevard Substation Rebuild
- Bore Pit
- Permanent Vault Pad
- Boulevard Retention Pond
- Low-Water Crossing
- Existing Road
- Boulevard Access Road



1:2,000



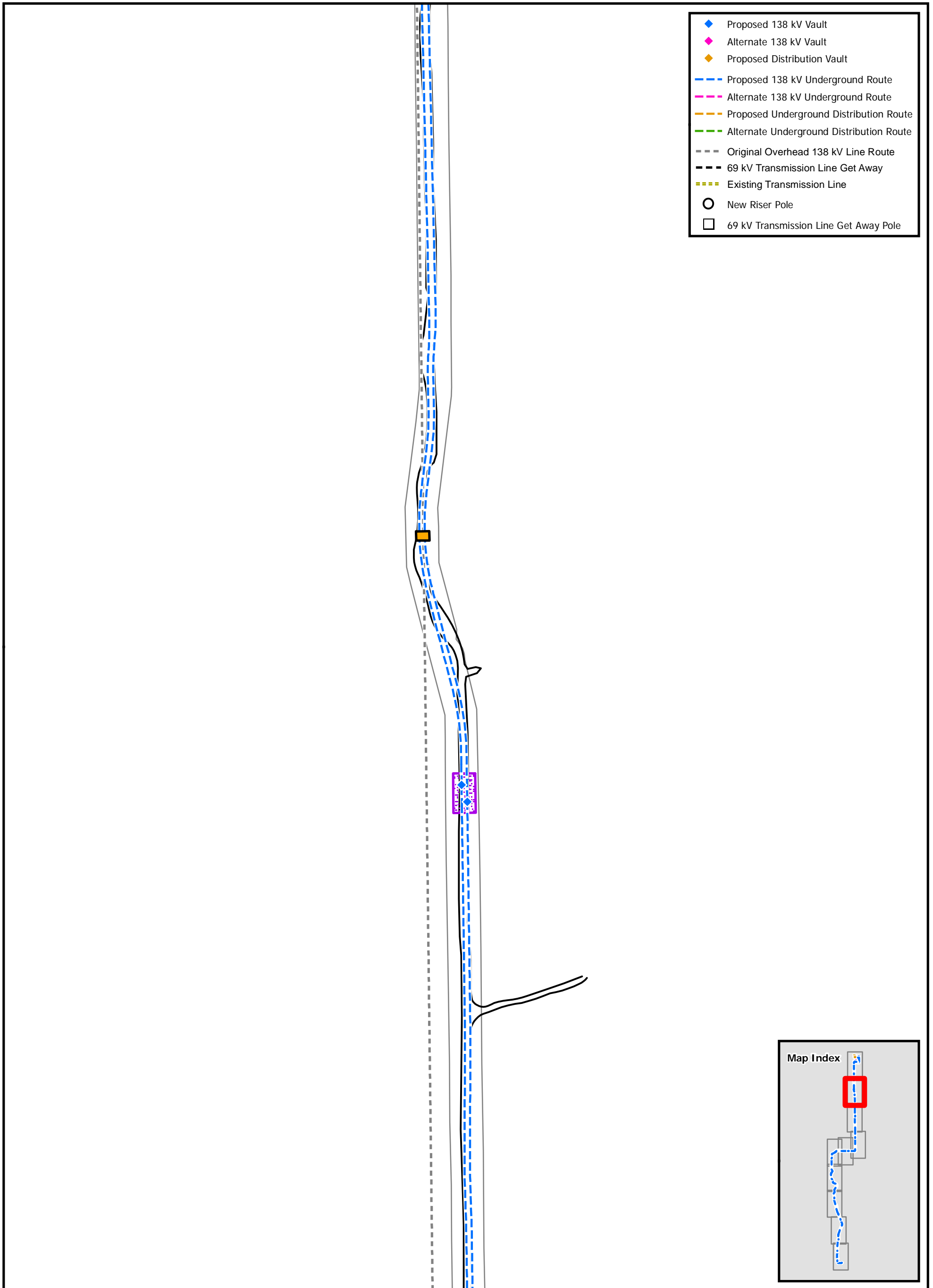


Figure A-3: Preliminary Underground Alignment Drawing 2 of 10

East County Substation Project

- Permanent ROW
- Road Grading
- Boulevard Substation Rebuild
- Bore Pit
- Permanent Vault Pad
- Boulevard Retention Pond
- Low-Water Crossing
- Existing Road
- Boulevard Access Road



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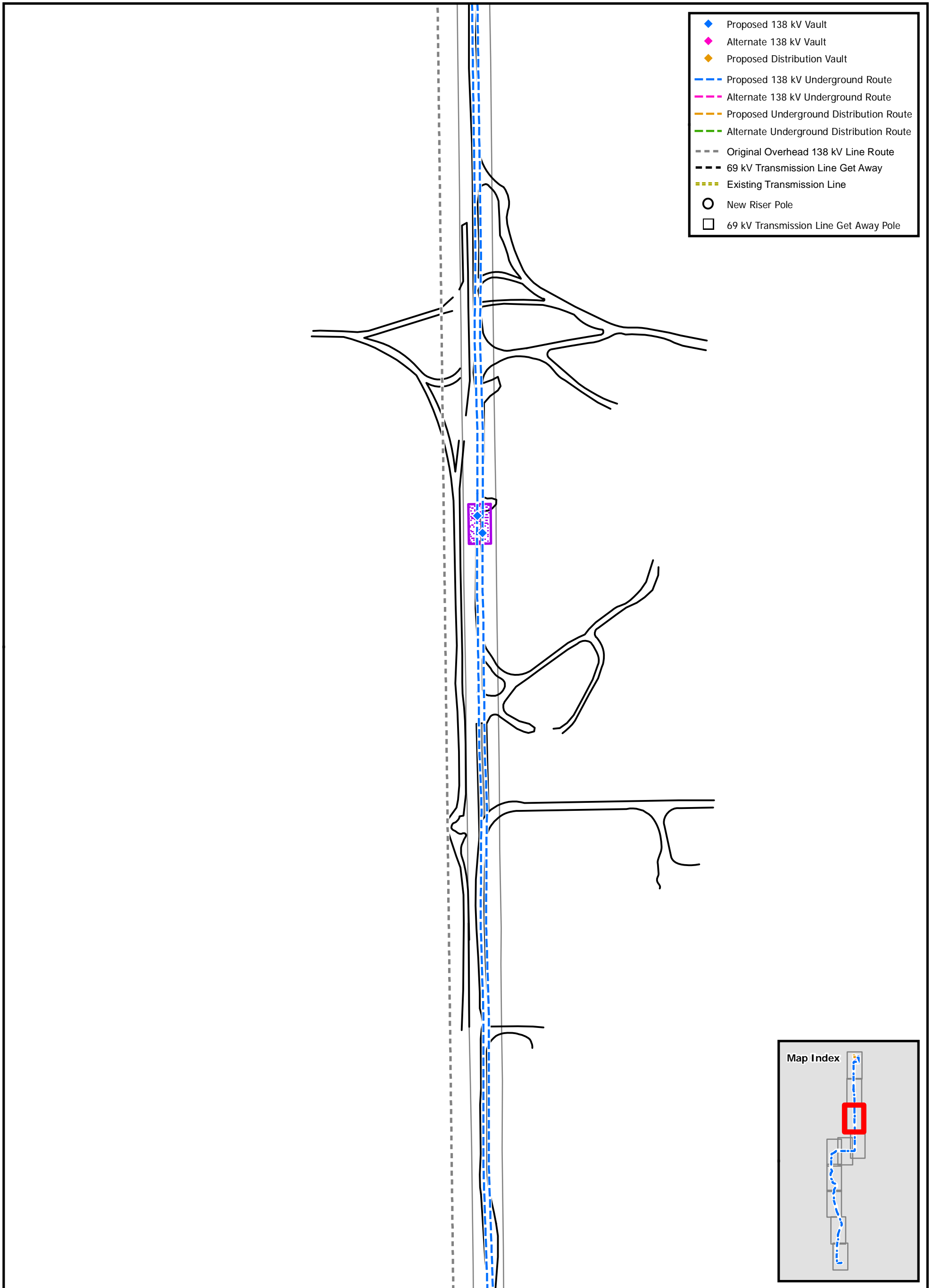


Figure A-3: Preliminary Underground Alignment Drawing 3 of 10

East County Substation Project

- Permanent ROW (White box)
- Road Grading (Grey box)
- Boulevard Substation Rebuild (Blue box)
- Bore Pit (Green box)
- Permanent Vault Pad (Purple box)
- Boulevard Retention Pond (Green box)
- Low-Water Crossing (Yellow box)
- Existing Road (Black line)
- Boulevard Access Road (Red box)



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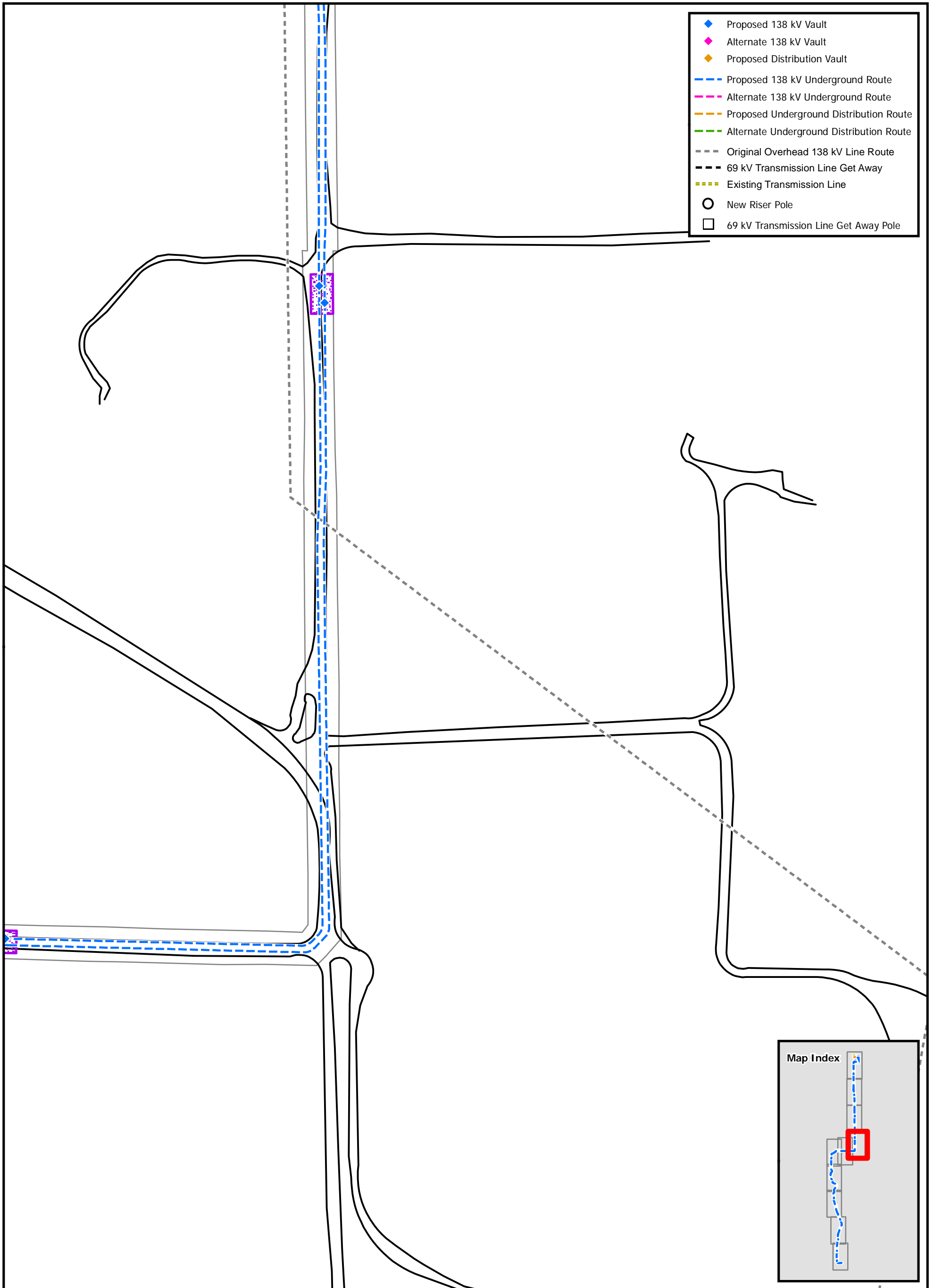


Figure A-3: Preliminary Underground Alignment Drawing 4 of 10

East County Substation Project

- Permanent ROW (White box)
- Road Grading (Grey box)
- Boulevard Substation Rebuild (Blue box)
- Bore Pit (Cyan box)
- Permanent Vault Pad (Purple box)
- Boulevard Retention Pond (Green box)
- Low-Water Crossing (Orange box)
- Existing Road (Black line)
- Boulevard Access Road (Red box)



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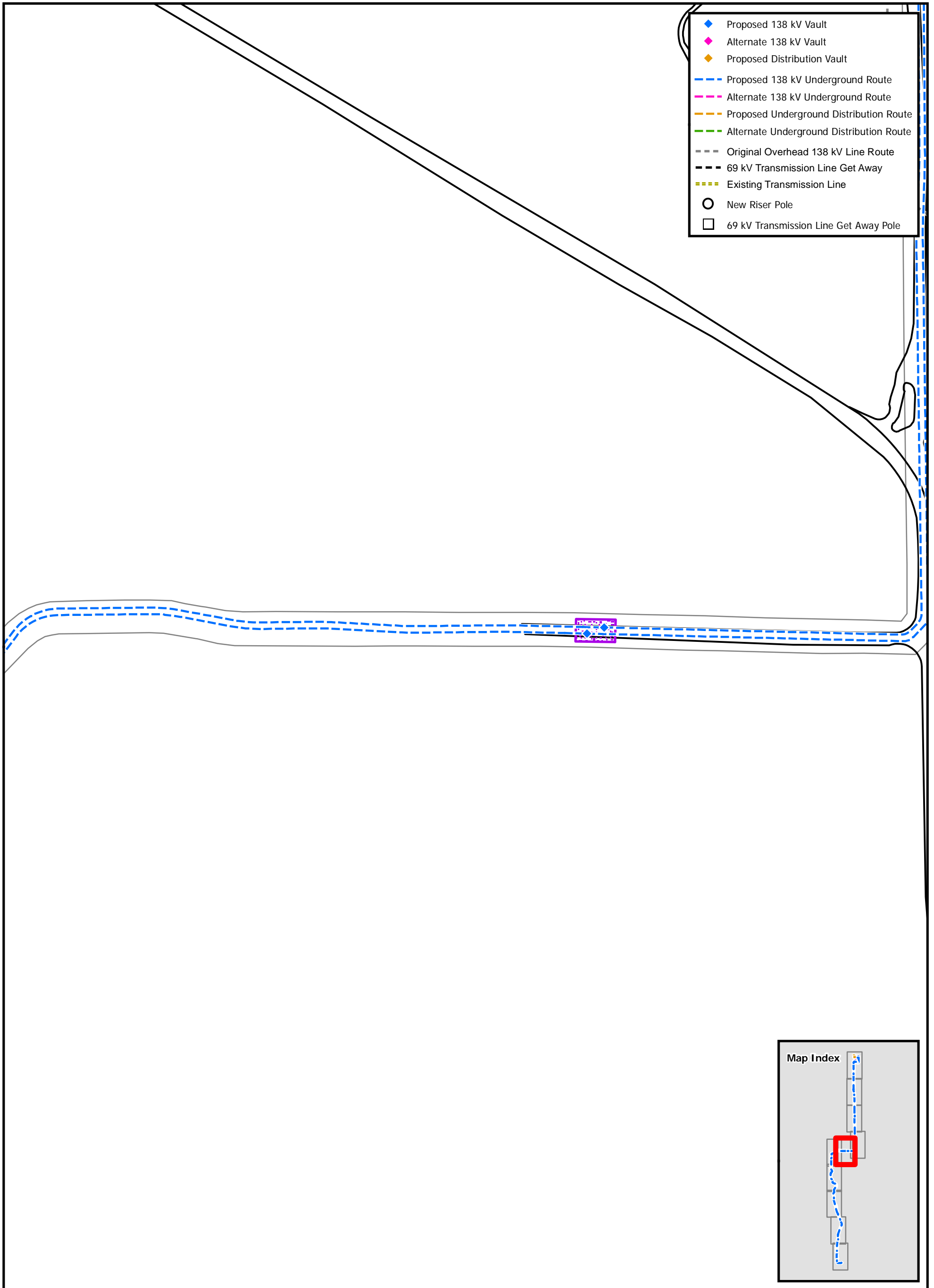


Figure A-3: Preliminary Underground Alignment Drawing 5 of 10

East County Substation Project

- Permanent ROW
- Road Grading
- Boulevard Substation Rebuild
- Bore Pit
- Permanent Vault Pad
- Boulevard Retention Pond
- Low-Water Crossing
- Existing Road
- Boulevard Access Road



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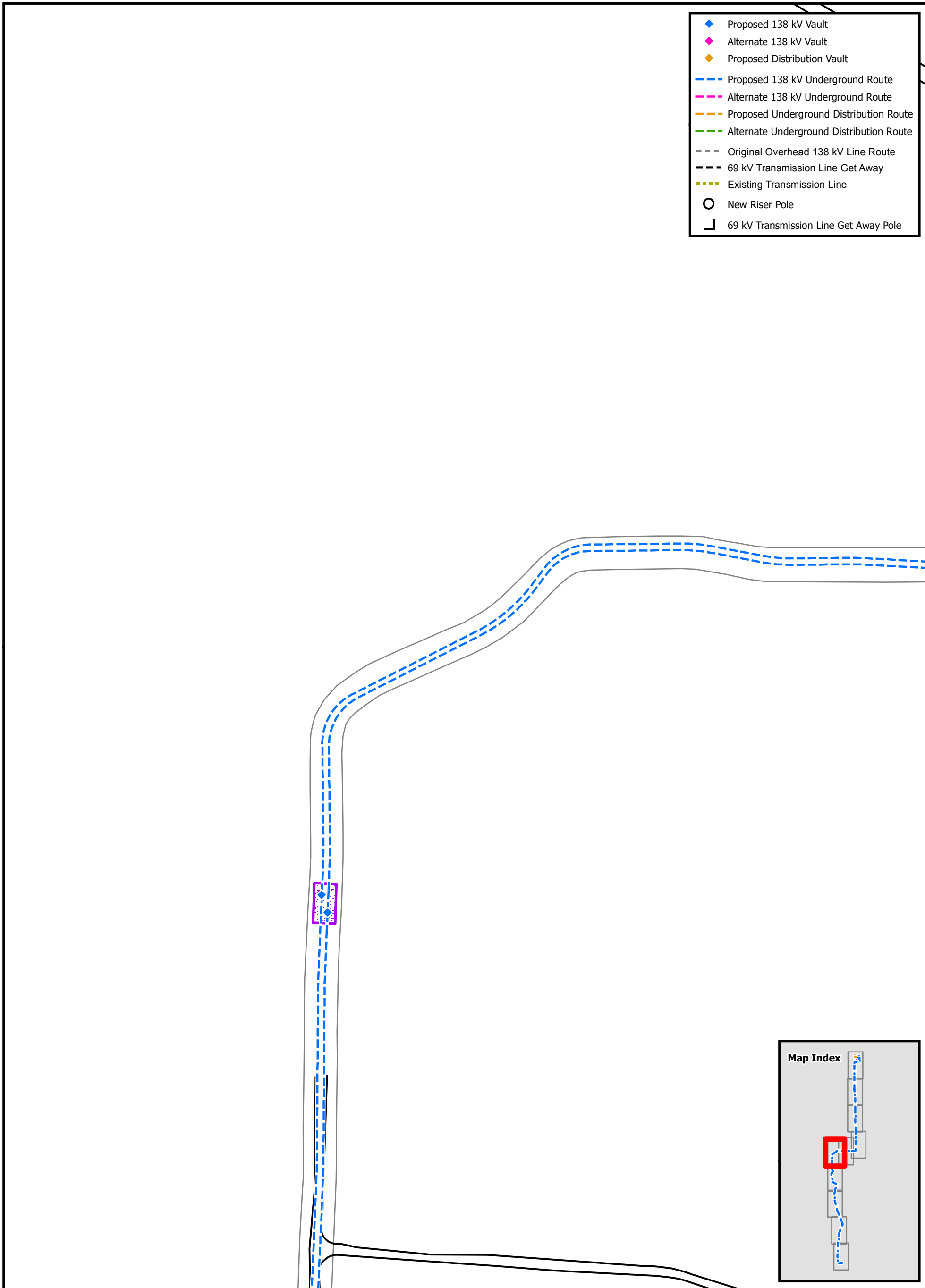


Figure A-3: Preliminary Underground Alignment Drawing 6 of 10

East County Substation Project

- Permanent ROW (White box)
- Road Grading (Grey box)
- Boulevard Substation Rebuild (Blue box)
- Bore Pit (Cyan box)
- Permanent Vault Pad (Purple box)
- Boulevard Retention Pond (Green box)
- Low-Water Crossing (Yellow box)
- Existing Road (Black line)
- Boulevard Access Road (Red box)



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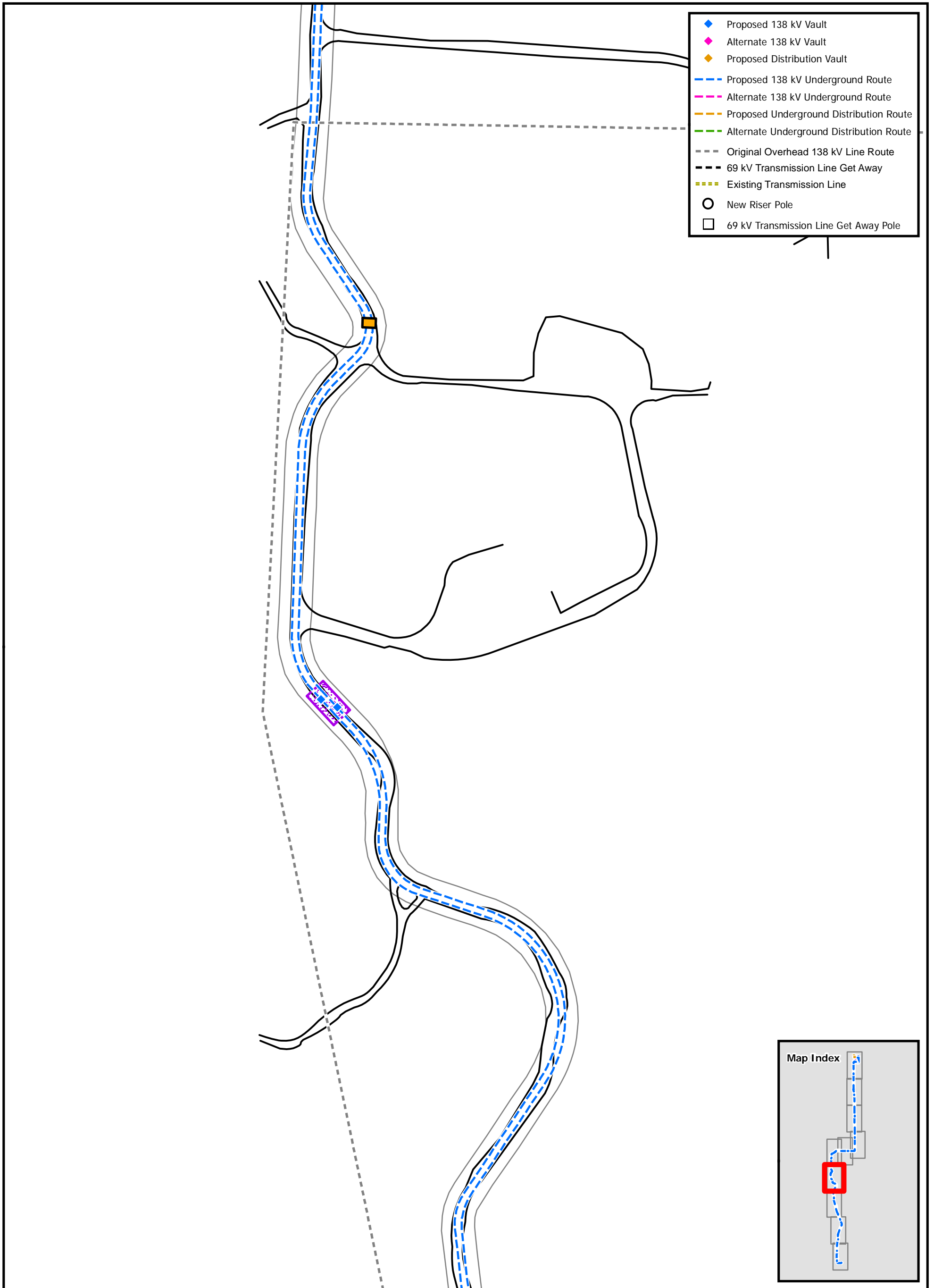


Figure A-3: Preliminary Underground Alignment Drawing 7 of 10

East County Substation Project

- | | | |
|--------------------|---------------------|------------------------------|
| Permanent ROW | Road Grading | Boulevard Substation Rebuild |
| Bore Pit | Permanent Vault Pad | Boulevard Retention Pond |
| Low-Water Crossing | Existing Road | Boulevard Access Road |



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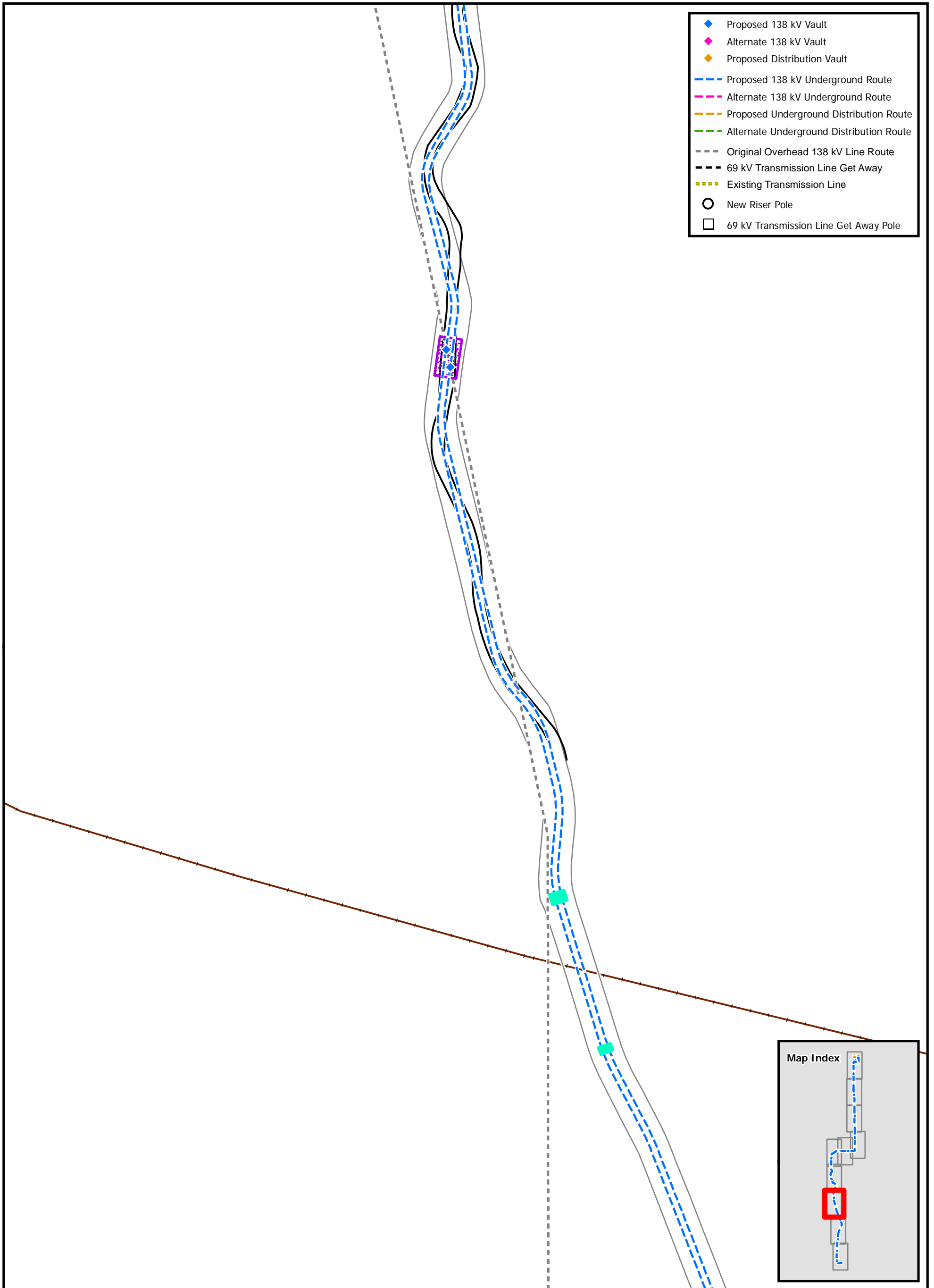


Figure A-3: Preliminary Underground Alignment Drawing 8 of 10

East County Substation Project

- Permanent ROW
- Road Grading
- Boulevard Substation Rebuild
- Bore Pit
- Permanent Vault Pad
- Boulevard Retention Pond
- Low-Water Crossing
- Existing Road
- Boulevard Access Road



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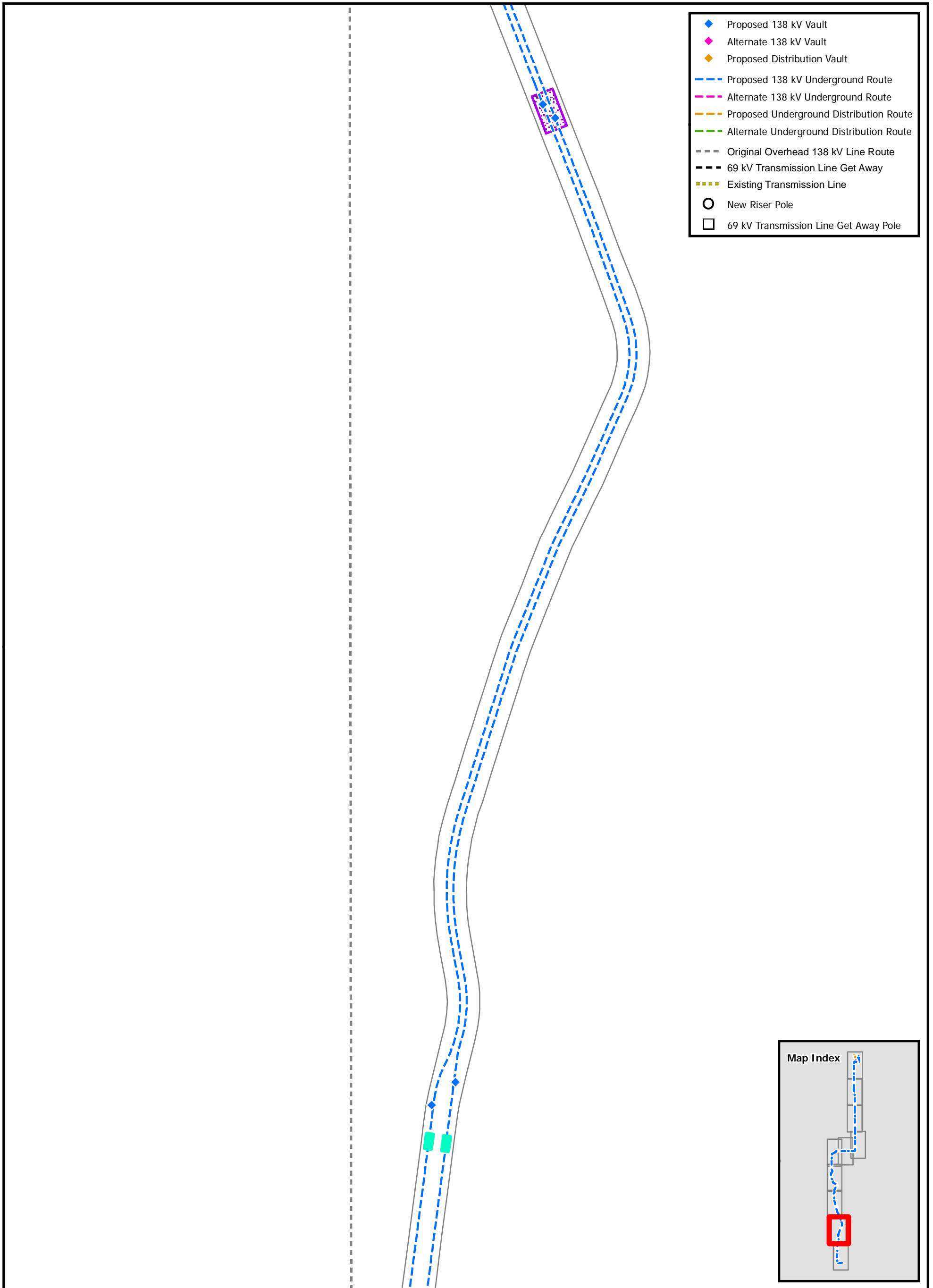


Figure A-3: Preliminary Underground Alignment Drawing 9 of 10

East County Substation Project

- Permanent ROW (White box)
- Road Grading (Grey box)
- Boulevard Substation Rebuild (Blue box)
- Bore Pit (Cyan box)
- Permanent Vault Pad (Purple box with dots)
- Boulevard Retention Pond (Green box with dots)
- Low-Water Crossing (Yellow box)
- Existing Road (Black line)
- Boulevard Access Road (Red box)



1:2,000



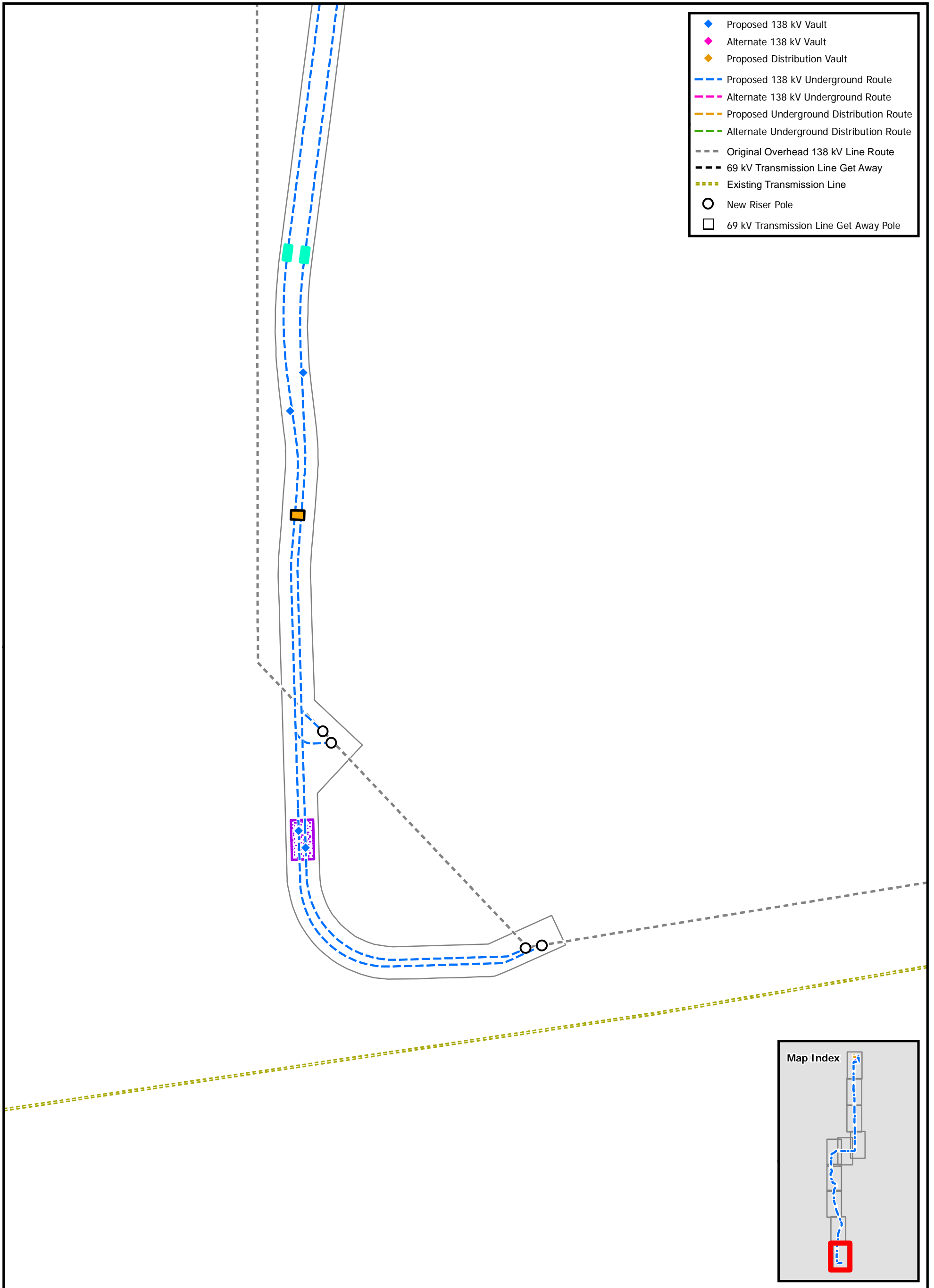


Figure A-3: Preliminary Underground Alignment Drawing 10 of 10

East County Substation Project

- | | | |
|--------------------|---------------------|------------------------------|
| Permanent ROW | Road Grading | Boulevard Substation Rebuild |
| Bore Pit | Permanent Vault Pad | Boulevard Retention Pond |
| Low-Water Crossing | Existing Road | Boulevard Access Road |



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Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
					Redline of Existing Language	Proposed Revised Language
D.2 – Biological Resources						
1.	D.2 Biological Resources	D.2-241	Mitigation Measure (MM) BIO-1a	<p>The use of a petrol-based, non-renewable resource, such as orange construction fencing, does not enhance the protection of biological resources. The introduction of the fencing material to the environment and the additional ground disturbance required for the installation creates more impact to the surrounding habitat. Placement of wooden survey stakes along the perimeter of the work areas would offer the same level of resource protection as the construction fencing without the negative impacts.</p> <p>Construction of the 138 kilovolt (kV) transmission line would require the construction of spur roads off of existing dirt roads. The existing roads off of which the Project spur roads would be constructed include the Southwest Powerlink access road and roads utilized by the public to access private properties. San Diego Gas & Electric Company (SDG&E) maintains regular communication with land-management agencies in the area. These agencies have not identified a need to gate these existing roads to prevent unauthorized use. Construction of the Project would not increase the likelihood of authorized access. In addition, the installation of gates would adversely affect the response time of local agencies, including the United States (U.S.) Border Patrol and the California Department of Forestry and Fire Protection (CAL FIRE).</p> <p>In consultation with the United States (U.S.) Fish and Wildlife Service (USFWS), SDG&E has agreed to gate two specific access roads off of Old Highway 80, which would prevent unauthorized access to Quino checkerspot butterfly (QCB) occupied critical habitat. The gates would be installed after construction has been completed.</p>	<p>BIO-1a. Confine all construction and construction-related activities to the minimum necessary area as defined by the final engineering plans. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified on the final engineering plans. The limits of the approved work space shall be delineated with stakes and/or flagging that shall be maintained throughout the construction period. The limits of the approved work space shall be delineated with orange construction fencing that shall be maintained throughout the construction period. An environmental monitor shall complete regular 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. <u>After construction, two entrances to access roads, as shown on Figure 3: Gate Installation Locations within the Biological Assessment submitted to the USFWS on August 30, 2010, shall be gated to prevent the unauthorized use of these construction access roads by the general public. During and after construction, entrances to access roads shall be gated to prevent the unauthorized use of these construction access roads by the general public.</u> Signs prohibiting unauthorized use of the access roads shall be posted on these gates.</p>	<p>BIO-1a. Confine all construction and construction-related activities to the minimum necessary area as defined by the final engineering plans. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified on the final engineering plans. The limits of the approved work space shall be delineated with stakes and/or flagging that shall be maintained throughout the construction period. An environmental monitor shall complete regular 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. After construction, two entrances to access roads, as shown on Figure 3: Gate Installation Locations within the Biological Assessment submitted to the USFWS on August 30, 2010, shall be gated to prevent the unauthorized use of these construction access roads by the general public. Signs prohibiting unauthorized use of the access roads shall be posted on these gates.</p>
2.	D.2 Biological Resources	D.2-242 & 243	MM BIO-1e	<p>This measure should be revised to reflect that SDG&E would fulfill all required mitigation, as outlined within the permits and authorizations that would be secured from the U.S. Army Corps of Engineers (USACE), USFWS, Bureau of Land Management (BLM), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Game (CDFG).</p>	<p>BIO-1e. Provide habitat compensation or restoration for permanent impacts to native vegetation communities. Permanent impact to all native vegetation communities shall be compensated through a combination of habitat compensation and habitat restoration <u>as required by the permits and authorizations that shall be secured from the USACE, USFWS, BLM, RWQCB, and CDFG, at a minimum of a 1:1 ratio or as required by the permitting agencies.</u> Habitat compensation shall be accomplished through agency approved land preservation or mitigation fee payment for the purpose of</p>	<p>BIO-1e. Provide habitat compensation or restoration for permanent impacts to native vegetation communities. Permanent impact to all native vegetation communities shall be compensated through a combination of habitat compensation and habitat restoration as required by the permits and authorizations that shall be secured from the USACE, USFWS, BLM, RWQCB, and CDFG.</p>

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
					Redline of Existing Language	Proposed Revised Language
					<p>habitat compensation of lands supporting comparable habitats to those lands impacted by the Proposed PROJECT. 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 above for Mitigation Measure BIO-1d. The Habitat Restoration Plan shall be approved by the permitting agencies prior to construction of the project. All habitat compensation and restoration used as mitigation for the Proposed PROJECT 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 PROJECT on private lands shall include long term management and legal protection assurances.</p>	
3.	D.2 Biological Resources	D.2-243	MM BIO-1f	The Fire and Fuels Management section of the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) does not identify why the implementation of applicant-proposed measure (APM) HAZ-06: Wildland Fire Prevention and Fire Safety Electric Standard Practice, as proposed in the Proponent’s Environmental Assessment (PEA), is inadequate to reduce the potential for Project impacts related to fire. This is SDG&E standard practice and more appropriate as an APM. Therefore, the existing plan should be implemented and there is no need for an additional mitigation measure.	BIO-1f. Implement fire prevention best management practices during construction and operation activities. Fire prevention best management practices shall be implemented during construction and operation of the project as specified by <u>SDG&E’s Electrical Standard Practice – Wildland Fire Prevention and Fire Safety Plan that was submitted as part of the PEA.</u> the Construction Fire Prevention/Protection Plan (to be developed as required under Mitigation Measure FF-1) and Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan (to be revised as required under Mitigation Measure FF-2).	BIO-1f. Implement fire prevention best management practices during construction and operation activities. Fire prevention best management practices shall be implemented during construction and operation of the project as specified by SDG&E’s Electrical Standard Practice – Wildland Fire Prevention and Fire Safety Plan that was submitted as part of the PEA.
4.	D.2 Biological Resources	D.2-244	MM BIO-2a	The use of a petrol-based, non-renewable resource, such as orange construction fencing, does not enhance the protection of biological resources. The introduction of the fencing material to the environment and the additional ground disturbance required for the installation creates more impact to the surrounding habitat. Placement of wooden survey stakes along the perimeter of the work areas would offer the same level of resource protection as the construction fencing without the negative impacts.	BIO-2a. Limit temporary and permanent impacts to jurisdictional features to the minimum necessary as defined by the final engineering plans. 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 identified on the final engineering plans. <u>The limits of the approved work space shall be delineated with stakes and/or flagging that shall be maintained throughout the construction period.</u> The limits of construction shall be delineated with orange construction fencing and maintained throughout construction to avoid and minimize impacts to jurisdictional resources. 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	BIO-2a. Limit temporary and permanent impacts to jurisdictional features to the minimum necessary as defined by the final engineering plans. 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 identified on the final engineering plans. The limits of the approved work space shall be 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

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					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 Game for impacts to jurisdictional features prior to project construction. The terms and conditions of these authorizations shall be implemented.	Board, and California Department of Fish and Game for impacts to jurisdictional features prior to project construction. The terms and conditions of these authorizations shall be implemented.
5.	D.2 Biological Resources	D.2-244	MM BIO-2b	The “permitting agencies” need to be identified as the USACE, CDFG, and RWQCB. This paragraph should also reflect using enhancement, and possibly preservation, for impacts to CDFG jurisdictional drainages.	BIO-2b. Implement habitat creation, <u>enhancement, preservation,</u> and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination <u>of</u> habitat creation (i.e., establishment), <u>enhancement, preservation, and/or habitat</u> restoration at a minimum of a 1:1 ratio or as required by the <u>USACE, CDFG, and RWQCB.</u> permitting agencies <u>The Any</u> creation, <u>enhancement, preservation, and/or</u> restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the CPUC or BLM (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the CPUC or BLM, the temporary impact shall be considered a permanent impact and compensated accordingly. All habitat creation and restoration used as mitigation for the Proposed ECO Substation Project on public lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as mitigation for the project on private lands shall include long-term management and legal protection assurances.	BIO-2b. Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or restoration at a minimum of a 1:1 ratio or as required by the USACE, CDFG, and RWQCB. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the CPUC or BLM (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the CPUC or BLM, the temporary impact shall be considered a permanent impact and compensated accordingly. All habitat creation and restoration used as mitigation for the Proposed ECO Substation Project on public lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as mitigation for the project on private lands shall include long-term management and legal protection assurances.
6.	D.2 Biological Resources	D.2-245	MM BIO-3a	APMs and best management practices (BMPs) to be included within the EIR/EIS, Storm Water Pollution Prevention Plan (SWPPP), and Noxious Weeds and Invasive Species Control Plan would be utilized to prevent the spread of noxious and invasive weeds to cleared areas. This measure, as written, would greatly increase the construction schedule by limiting the number of locations that construction crews would be allowed to work. Increasing the duration of	BIO-3a. Prepare and implement a Noxious Weeds and Invasive Species Control Plan. A Noxious Weeds and Invasive Species Control Plan shall be prepared and reviewed by the California Public Utilities Commission/Bureau of Land Management and applicable permitting agencies. The plan shall be implemented during all phases of project construction and operation. The plan shall include best management practices to avoid and minimize the direct or indirect effect of the establishment and spread of invasive plant species during	BIO-3a. Prepare and implement a Noxious Weeds and Invasive Species Control Plan. A Noxious Weeds and Invasive Species Control Plan shall be prepared and reviewed by the California Public Utilities Commission/Bureau of Land Management and applicable permitting agencies. The plan shall be implemented during all phases of project construction and operation. The plan shall include best management practices to avoid and minimize the direct or indirect effect of the establishment and spread of invasive plant species during

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				<p>construction activities increases the length of temporary impacts associated with biological resources, noise, air quality, visual resources, and traffic and transportation. The length and frequency of noxious weed monitoring would be outlined within the agency-approved Noxious Weeds and Invasive Species Control Plan.</p>	<p>construction. Implementation of specific protective measures shall be required during construction, such as cleaning vehicles prior to off-road use, using weed-free imported soil/material, restricted vegetation removal and requiring topsoil storage. Development and implementation of weed management procedures shall be used to monitor and control the spread of weed populations along the construction access and transmission line right-of ways. Vehicles used in transmission line construction shall be cleaned prior to operation off of maintained roads. <u>Noxious weed management shall be conducted in accordance to the agency-approved Noxious Weeds and Invasive Species Control Plan. Existing vegetation shall be cleared only from areas scheduled for immediate construction work and only for the width needed for active construction activities. Noxious weed management shall be conducted annually to prevent the establishment and spread of invasive plant species.</u> This shall include weed abatement efforts, targeted at plants listed as invasive exotics by the California Exotic Plant Pest Council in their most recent “A” or “Red Alert” list. Pesticide use should be limited to non-persistent pesticides and should only be applied in accordance with label and application permit directions and restrictions for terrestrial and aquatic applications.</p>	<p>construction. Implementation of specific protective measures shall be required during construction, such as cleaning vehicles prior to off-road use, using weed-free imported soil/material, restricted vegetation removal and requiring topsoil storage. Development and implementation of weed management procedures shall be used to monitor and control the spread of weed populations along the construction access and transmission line right-of ways. Vehicles used in transmission line construction shall be cleaned prior to operation off of maintained roads. Noxious weed management shall be conducted in accordance to the agency-approved Noxious Weeds and Invasive Species Control Plan. This shall include weed abatement efforts, targeted at plants listed as invasive exotics by the California Exotic Plant Pest Council in their most recent “A” or “Red Alert” list. Pesticide use should be limited to non-persistent pesticides and should only be applied in accordance with label and application permit directions and restrictions for terrestrial and aquatic applications.</p>
7.	D.2 Biological Resources	D.2-246	MM BIO-4a	<p>Watering work sites for 48 hours in advance of construction would attract wildlife to the site due to the abundance of water in the area when compared to the surrounding desert habitat. Attracting wildlife to the work areas would increase the potential of direct take of common and special-status species. There is also the potential of wasting large amounts of water if the construction schedule changes, not allowing crews to begin work in prewatered areas. In addition, MM AQ-1 does not require 48 hours of prewatering, indicating that the air quality specialist that developed the MM did not conclude that prewatering for 48 hours was necessary. This portion of the MM should be omitted.</p>	<p>BIO-4a. Prepare and implement a Dust Control Plan. The project proponent shall (a) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; (b) pre-water sites for 48 hours in advance of clearing; (be) reduce the amount of disturbed area where feasible; (cd) spray all dirt stock-pile areas daily as needed; (de) cover loads in haul trucks or maintain at least 6 inches of free-board when traveling on public roads; (ef) pre-moisten, prior to transport, import and export dirt, sand, or loose materials; (fg) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets or wash trucks and equipment before entering public streets; (gh) plant vegetative ground cover in disturbed areas as soon as possible following construction; (hi) apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for 14 consecutive days); and (ij) prepare and file with the San Diego Air Pollution Control District, Bureau of Land Management and California Public Utilities Commission a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. This</p>	<p>BIO-4a. Prepare and implement a Dust Control Plan. The project proponent shall (a) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; (b) reduce the amount of disturbed area where feasible; (c) spray all dirt stock-pile areas daily as needed; (d) cover loads in haul trucks or maintain at least 6 inches of free-board when traveling on public roads; (e) pre-moisten, prior to transport, import and export dirt, sand, or loose materials; (f) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets or wash trucks and equipment before entering public streets; (g) plant vegetative ground cover in disturbed areas as soon as possible following construction; (h) apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for 14 consecutive days); and (i) prepare and file with the San Diego Air Pollution Control District, Bureau of Land Management and California Public Utilities Commission a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. This plan shall be developed consistent with the requirements of Mitigation</p>

Attachment B – Proposed Mitigation Measure Revisions
 East County Substation Project Draft EIR-EIS



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					plan shall be developed consistent with the requirements of Mitigation Measure AQ-1.	Measure AQ-1.
8.	D.2 Biological Resources	D.2-247 & 248	MM BIO-7b	As derived from SDG&E's Natural Community Conservation Planning (NCCP), APM-AIR-07, which was included in the PEA, limits travel speeds on unpaved roads and the right-of-way to 15 miles per hour. APM-BIO-04 further limits nighttime travel speeds to 10 miles per hour. Because these more restrictive limitations are already included in the PEA, this measure is unnecessary.	BIO-7b. Enforce speed limits in and around all construction areas. Vehicles shall not exceed 25 miles per hour on any gravel roads accessing the construction site or 20 miles per hour on the construction site.	Not Applicable. The entire measure should be omitted.
9.	D.2 Biological Resources	D.2-248	MM BIO-7d	APM-BIO-01 of the PEA already prohibits littering and requires daily food-related garbage and trash removal, making this measure duplicative and unnecessary.	BIO-7d. Prohibit littering and remove trash from construction areas daily. Littering shall not be allowed by the project personnel. All food-related trash and garbage shall be removed from the construction sites on a daily basis.	Not Applicable. The entire measure should be omitted.
10.	D.2 Biological Resources	D.2-249	MM BIO-7g	This MM should be revised to reflect the agreement with the USFWS. Based upon Section 7 Consultation with the USFWS Carlsbad Office, SDG&E understands that protocol-level QCB surveys conducted in 2010 will be valid for the commencement of construction through May 2012. If construction of the East County (ECO) Substation Project is delayed beyond May 2012, SDG&E will contact USFWS to discuss whether an additional survey is warranted.	BIO-7g. Conduct protocol surveys for Quino checkerspot butterfly (QCB) within two+ years prior to project construction activities in occupied habitat. SDG&E shall conduct preconstruction pProtocol-level surveys for QCBuino checkerspot butterfly will occur no more than two years prior to the commencement of within 1 year prior to construction activities. in any area known to support the species. The surveys that were conducted in the spring of 2010 will be valid for construction in 2012 so long as construction commences before May 2012. If construction is not scheduled to commence before May 2012, SDG&E will contact the USFWS to discuss whether an additional survey is warranted. Surveys shall be conducted by a qualified, permitted biologist in accordance with the most currently accepted protocol survey accordance with the most currently accept protocol survey method. Results shall be reported to the U.S. Fish and Wildlife Service within 45 days of the completion of the survey.	BIO-7g. Conduct protocol surveys for Quino checkerspot butterfly (QCB) within two years prior to project construction activities in occupied habitat. Protocol-level surveys for the QCB will occur no more than two years prior to the commencement of construction activities. The surveys that were conducted in the spring of 2010 will be valid for construction in 2012 so long as construction commences before May 2012. If construction is not scheduled to commence before May 2012, SDG&E will contact the USFWS to discuss whether an additional survey is warranted.
11.	D.2 Biological Resources	D.2-249 & 250	MM BIO-7h	SDG&E recommends clarifying that the federal agency with jurisdiction over QCB is the USFWS.	BIO-7h. Provide compensation for temporary and permanent impacts to Quino checkerspot butterfly habitat through conservation and/or restoration. Temporary and permanent impact to Quino checkerspot butterfly shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Habitat compensation shall be accomplished through USFWS-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be	BIO-7h. Provide compensation for temporary and permanent impacts to Quino checkerspot butterfly habitat through conservation and/or restoration. Temporary and permanent impact to Quino checkerspot butterfly shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Habitat compensation shall be accomplished through USFWS-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be

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					appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the Proposed PROJECT 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 PROJECT on private lands shall include long-term management and legal protection assurances.	appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the Proposed PROJECT 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 PROJECT on private lands shall include long-term management and legal protection assurances.
12.	D.2 Biological Resources	D.2-251	MM BIO-10b	<p>A project-specific avian protection plan is not necessary. As the Draft EIR/EIS demonstrates, the potential impacts to avian species from the ECO Substation Project is minimal, and does not pose a significant collision risk to raptor species due to its location and design, <i>see, e.g.</i>, D.2-172. The collision risk associated with individual wind projects interconnecting into the ECO Substation Project are addressed as part of the review and approval of those individual wind projects. Although electric transmission facilities can pose a risk of electrocution to avian species, SDG&E designs and constructs its facilities in compliance with Avian Power Line Interaction Committee (APLIC) standards to minimize potential impacts to avian species. The ECO Substation Project proposes construction of new facilities that will conform to these standards. Moreover, internal SDG&E avian protection protocols include:</p> <ul style="list-style-type: none"> • Corporate Policy (a raptor protection program) • Identifying and isolating where bird caused outages occur • Identifying operation districts within the SDG&E Service Area that have a higher potential for avian problems • Retrofitting existing power lines and developing modified construction guidelines to reduce potential interactions with avian species and the conductors • Nest Management • Avian Enhancement Options (e.g., nest platforms) • Construction Design Standards (e.g., new construction and modifications of existing facilities) 	<p>BIO-10b. Develop and implement project-specific Avian avian pProtection Plans. SDG&E shall implement existing internal SDG&E protocols during the construction and operation and maintenance of the ECO Substation Project. SDG&E shall also confer with the USFWS and seek concurrence that the ECO Substation Project does not pose a substantial risk to avian species. If the USFWS determines that a project-specific avian protection plan is required, SDG&E shall develop and implement an avian protection plan, after conferring with the USFWS and California Department of Fish and Game.</p> <p>. Develop and implement project-specific Avian Protection Plans. Develop and implement an Avian Protection Plan related to wire, transmission tower, and facilities impacts from electrocution and collision of bird species. An Avian Protection Plan shall be developed jointly with the U.S. Fish and Wildlife Service and California Department of Fish and Game and shall provide the framework necessary for implementing a program to reduce bird mortalities and document actions. The Avian Protection Plan shall include the following: corporate policy, training, permit compliance, construction design standards, nest management, avian reporting system, risk assessment methodology, mortality reduction measures, avian enhancement options, quality control, public awareness, and key resources.</p>	<p>BIO-10b. Develop and implement avian protection. SDG&E shall implement existing internal SDG&E protocols during the construction and operation and maintenance of the ECO Substation Project. SDG&E shall also confer with the USFWS and seek concurrence that the ECO Substation Project does not pose a substantial risk to avian species. If the USFWS determines that a project-specific avian protection plan is required, SDG&E shall develop and implement an avian protection plan, after conferring with the USFWS and California Department of Fish and Game. -</p>

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				<ul style="list-style-type: none"> • Avian Reporting System (e.g., internal) • Training program (e.g., internal and contractors) • Quality Control • Key Resources (e.g., Environmental, Transmission and Distribution Technical Assessment, Electrical Transmission and Distribution Engineering, other APLIC members, Edison Electric Institute, Sky Hunters Raptor Education & Rehabilitation Center) <p>Implementation of these protocols reduces the potential electrocution impacts to raptors and other avian species, provides for ongoing evaluation consistent with that associated with other SDG&E facilities, and assists SDG&E in identifying where bird outages occur in order to minimize future electrocutions and collisions.</p> <p>Given the very low risks posed to avian species at the ECO Substation Project, SDG&E believes that the proposed requirement for an avian protection plan is unnecessary. The proposed MM BIO-10b includes proposed provisions not typically required for substation and transmission line projects. SDG&E would confer with the USFWS and the California Department of Fish and Game to confirm that no avian protection plan is required for the ECO Substation Project.</p>		
13.	D.2 Biological Resources	D.2-251	MM BIO-11a	SDG&E's NCCP protocol requires the same protections for nesting birds during operations and maintenance activities as described here, thereby making this measure redundant and unnecessary.	BIO-11a. Conduct maintenance activities resulting in vegetation disturbance outside of the bird nesting season or conduct pre-construction nesting bird surveys. Maintenance activities with the potential to result in direct or indirect habitat disturbance, most notably vegetation management, shall be conducted outside of the bird nesting season to the maximum extent practicable. Where avoidance is not possible, the project proponent shall conduct pre-construction nesting bird surveys to determine the presence/absence of active nests in or adjacent to construction areas. If active nests are identified, appropriate avoidance measures would be identified and implemented to prevent disturbance to the nesting bird(s). If federal or state listed nesting birds are identified, the project proponent shall contact the U.S. Fish and Wildlife Service and/or California Department of Fish and Game to determine the appropriate course of action.	Not Applicable. The entire measure should be omitted.

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D.3 – Visual Resources						
14.	D.3 Visual Resources	D.3-135	MM VIS-3a	<p>The terrain in the Project area is undulating and varies greatly in elevation, which allows several vantage points of construction activities as work progresses. While visual screening can reduce distraction to passersby for certain types of construction projects, it is not a practiced use for power line construction due to the assembly-line nature of the work. Thus, screening certain work areas is infeasible and unnecessary, particularly for short-term and temporary impacts. In addition, the environmental impacts associated with installing visual screening (i.e., additional ground disturbance, one-time use of petroleum-based materials, air quality impacts associated with installation and removal, and excessive waste) far outweigh the impacts associated with viewing construction. Further, many of the temporary work area locations are dictated by land availability and areas that are previously disturbed in order to avoid and minimize impacts. Therefore, this measure should be revised to only require visual screening where up-close views could cause an adverse distraction to residents, pedestrians, or motorists.</p> <p>There is no evidence in the analysis suggesting that avoiding construction during periods of heavy recreational use would further reduce an impact that is already very short-term and temporary in nature. Moreover, the construction plan would not show whether work would be occurring on holidays or during periods of heavy recreational use. Construction areas visible from recreational facilities have already been presented in the EIR/EIS and would not significantly change during the final design. Further, submittal of the plan 60 days prior to construction is not possible because it is difficult to know where and when SDG&E's construction contractors would be working. Therefore, construction restrictions based on visibility should be omitted.</p>	<p>VIS-3a. Reduce visibility of construction activities and equipment. Construction sites and all staging and material and equipment storage areas, including storage sites for excavated materials, and helicopter fly yards shall be appropriately located away from areas of high public visibility. If visible from nearby roads, residences, public gathering areas, or recreational areas, facilities, or trails, construction sites and staging areas and fly yards shall be visually screened using temporary screening fencing. Fencing will be of an appropriate design and color for each specific location. Where practical, construction staging and storage will be screened with opaque fencing from close-range residential views. Additionally, construction in areas visible from recreation facilities and areas during holidays and periods of heavy recreational use shall be avoided. SDG&E shall submit final construction plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days before the start of construction.</p>	<p>VIS-3a. Reduce visibility of construction activities and equipment. If visible from nearby roads, residences, public gathering areas, or recreational areas, facilities, or trails, staging areas and fly yards shall be visually screened using temporary screening fencing. Fencing will be of an appropriate design and color for each specific location. Where practical, construction staging and storage will be screened with opaque fencing from close-range residential views. Additionally, construction in areas visible from recreation facilities and areas during holidays shall be avoided.</p>
15.	D.3 Visual Resources	D.3-136	MM VIS-3b	<p>A Construction Lighting Mitigation Plan was a requirement of the Sunrise Powerlink Project due to the inordinate number of alternatives analyzed by the lead agencies that limited a detailed analysis of lighting impacts during the California Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA) process; however, it is not applicable to the ECO Substation Project. The California Public utilities</p>	<p>VIS-3b. Reduce construction night-lighting impacts. The use of temporary night lighting shall be reduced to that necessary to complete the project according to the schedule presented in the EIR/EIS. If night lighting is required, it shall be shielded to the extent feasible based on industrial standards to reduce glare.</p> <p>SDG&E shall avoid construction during holidays in</p>	<p>VIS-3b. Reduce construction night-lighting impacts. The use of temporary night lighting shall be reduced to that necessary to complete the project according to the schedule presented in the EIR/EIS. If night lighting is required, it shall be shielded to the extent feasible based on industrial standards to reduce glare.</p> <p>SDG&E shall avoid construction during holidays in</p>

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				<p>Commission (CPUC) has analyzed similar SDG&E projects, such as the recent Silvergate Transmission Substation Project and Uptown Substation Project, and determined that Construction Lighting Plans were not necessary due to the limited amount of lighting proposed and the detail already provided in the Project Description.</p> <p>The impact of temporary night lighting at construction areas should be considered a Class III impact, given that public viewing areas are not frequently visited by the public during non-daylight hours. Further, directing night lighting so that it cannot be visible from public viewing areas could cause an unnecessary safety hazard and conflict with Occupational Safety and Health Administration requirements.</p> <p>This MM should be revised to stipulate that the use of temporary night lighting would be reduced to that necessary to complete the Project according to the schedule presented in the EIR/EIS. If night lighting is required, it would be shielded to the extent feasible based on industrial standards to reduce glare.</p>	<p>recreational areas if doing so would conflict with the San Diego County Noise Ordinance and/or conflict with a planned recreational event within close proximity of a construction area. SDG&E shall design and install all lighting at construction and storage yards and at staging areas and fly yards in accordance with the following:</p> <ul style="list-style-type: none"> • the visibility of light bulbs and reflectors are minimized from public viewing areas; • lighting does not cause reflected glare to the extent possible; • illumination of the project facilities, vicinity, and nighttime sky is minimized; • lighting shall be designed so that exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary; • all lighting shall be of minimum necessary brightness consistent with worker safety; and- • high illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied. <p>The Construction Lighting Mitigation Plan shall be reviewed for consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6322 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure reflected glare and light trespass is minimized. SDG&E shall submit a Construction Lighting Mitigation Plan to the CPUC and BLM for review and approval at least 90 days before the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SDG&E shall not order any exterior lighting fixtures or components until the Construction Lighting Mitigation Plan is approved by the CPUC and BLM. The Plan shall include but is not necessarily limited to the following:</p> <ul style="list-style-type: none"> • Lighting shall be designed so that exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent 	<p>recreational areas if doing so would conflict with the San Diego County Noise Ordinance and/or conflict with a planned recreational event within close proximity of a construction area. SDG&E shall design and install all lighting at construction and storage yards and at staging areas and fly yards in accordance with the following:</p> <ul style="list-style-type: none"> • the visibility of light bulbs and reflectors are minimized from public viewing areas; • lighting does not cause reflected glare to the extent possible; • illumination of the project facilities, vicinity, and nighttime sky is minimized; • lighting shall be designed so that exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary; • all lighting shall be of minimum necessary brightness consistent with worker safety; and • high illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied.

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					<p>light trespass outside the project boundary.</p> <ul style="list-style-type: none"> All lighting shall be of minimum necessary brightness consistent with worker safety. High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied. 	
16.	D.3 Visual Resources	D.3-137	MM VIS-3d	This measure provides that access or spur roads would be constructed at appropriate angles from the originating primary travel facilities. However, the ability to safely make turns with construction, operations, and maintenance vehicles, as well as avoid hydrological, cultural, and/or biological resources in the area, was already taken into account during the design phase. Thus, the ability to change road design to comply with this measure is constrained by these factors. This measure should be revised accordingly.	VIS-3d. Reduce in-line views of land scars. Construct access or spur roads at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain, <u>when feasible</u> . Contour grading should be used where feasible to better blend graded surfaces with existing terrain. SDG&E shall submit final construction plans demonstrating compliance with this measure to the CPUC and BLM for review and approval at least 60 days prior to the start of construction.	VIS-3d. Reduce in-line views of land scars. Construct access or spur roads at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain, when feasible. Contour grading should be used where feasible to better blend graded surfaces with existing terrain. SDG&E shall submit final construction plans demonstrating compliance with this measure to the CPUC and BLM for review and approval at least 60 days prior to the start of construction.
17.	D.3 Visual Resources	D.3-137	MM VIS-3e	This measure requires SDG&E to submit final construction and restoration plans demonstrating compliance with this measure to the CPUC and BLM for review and approval at least 60 days before the start of construction. However, the MM requires disturbed areas to be revegetated and returned to preconstruction conditions following construction. There is an aspect of the measure that would be shown on construction drawings and could be submitted 60 days before the start of construction. However, the timing of this measure needs to be corrected and the requirement to submit construction and restoration plans for review and approval 60 days prior to construction omitted since development of the plans and implementation of the measure are not related or dependent.	VIS-3e. Reduce visual contrast from unnatural vegetation lines. In those areas where views of land scars are unavoidable, the boundaries of disturbed areas shall be aggressively revegetated to create a less distinct and more natural-appearing line to reduce visual contrast. Furthermore, all graded roads and areas not required for ongoing operation, maintenance, or access shall be returned to preconstruction conditions. In those cases where potential public access is opened by construction routes, SDG&E shall create barriers or fences to prevent public access and shall patrol construction routes to prevent vandalized access and litter cleanup until all areas where vegetation was removed are returned to preproject state. SDG&E shall submit final construction and restoration plans demonstrating compliance with this measure to the CPUC and BLM for review and approval at least 60 days before the start of construction.	VIS-3e. Reduce visual contrast from unnatural vegetation lines. In those areas where views of land scars are unavoidable, the boundaries of disturbed areas shall be aggressively revegetated to create a less distinct and more natural-appearing line to reduce visual contrast. Furthermore, all graded roads and areas not required for ongoing operation, maintenance, or access shall be returned to preconstruction conditions. In those cases where potential public access is opened by construction routes, SDG&E shall create barriers or fences to prevent public access and shall patrol construction routes to prevent vandalized access and litter cleanup until all areas where vegetation was removed are returned to preproject state.
18.	D.3 Visual Resources	D.3-137	MM VIS-3f	This measure provides that topsoil located in areas containing sensitive habitat be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation. However, “sensitive habitat” is undefined. SDG&E recommends revising the measure for clarity.	VIS-3f. Minimize vegetation removal. Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed. Topsoil located in areas <u>to be restored containing sensitive habitat</u> shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation. Topsoil located in developed or disturbed areas is excluded from this measure.	VIS-3f. Minimize vegetation removal. Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed. Topsoil located in areas to be restored shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation. Topsoil located in developed or disturbed areas is excluded from this measure.
19.	D.3 Visual Resources	D.3-138	MM VIS-3g	This measure requires preparation of a Surface Treatment Plan. A Surface Treatment Plan was a requirement of the Sunrise Powerlink Project to reduce impacts on U.S. Forest Service (USFS)-managed lands. However, a Surface Treatment Plan is not applicable to the ECO Substation Project since the Project crosses no USFS lands. Further, SDG&E provided specific detail	VIS 3g. Reduce visual contrast associated with substation and ancillary facilities. SDG&E shall submit to the CPUC a Surface Treatment Plan describing the application of colors and textures to all new facility structure buildings, walls, fences, and components comprising all ancillary facilities including substations. The Surface Treatment Plan must reduce glare and minimize visual intrusion and contrast by	Not Applicable. The entire measure should be omitted.

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				<p>in the PEA on the color and texture of the materials that would be used to construct the substation and ancillary facilities. There is no additional information that was not presented by the CPUC or BLM that would further reduce visual impacts; therefore, preparation of a specific plan is unjustified. Further, SDG&E has already provided to-scale, 11-inch by 17-inch color visual simulations as part of the visual analysis in the PEA.</p> <p>MM VIS-3g requires SDG&E to use dulled-metal-finish transmission structures and non-specular conductors. Given that the colors for Project components have been described in the Project Description, visually represented in Section D.3 of the EIR/EIS, and determined by the CPUC through MM VIS-3g, a Surface Treatment Plan would not further reduce impacts than what was analyzed. Therefore, MM VIS-3g should be omitted.</p>	<p>blending the facilities with the landscape. The Treatment Plan shall be submitted to the CPUC for approval at least 90 days before (a) ordering the first structures that are to be color treated during manufacture or (b) construction of any of the ancillary facility components, whichever comes first. If the CPUC notifies SDG&E that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, SDG&E shall prepare and submit for review and approval a revised Plan. The Surface Treatment Plan shall include:</p> <ul style="list-style-type: none"> • Specification and 11 x 17 inch color simulations at life-size scale of the treatment proposed for use on project structures, including structures treated during manufacture • A list of each major project structure, building, tower and/or pole, and fencing specifying the color(s) and finish proposed for each (colors must be identified by name and by vendor brand or a universal designation) • Two sets of brochures and/or color chips for each proposed color • A detailed schedule for completion of the treatment • Procedures to ensure proper treatment maintenance for the life of the project. <p>SDG&E shall not specify to the vendors the treatment of any buildings or structures treated during manufacture or perform the final treatment on any buildings or structures treated on site, until SDG&E receives notification of approval of the Surface Treatment Plan by the CPUC. Within 30 days following the start of commercial operation, SDG&E shall notify the CPUC that all buildings and structures are ready for inspection.</p>	
20.	D.3 Visual Resources	D.3-138	MM VIS-3h	<p>This measure provides that a Screening Plan for screening vegetation, walls, and fences that reduces the visibility of ancillary facilities would be required. However, SDG&E has already developed a Landscape Plans, which were submitted with the PEA as Figure 4.1-3: East County Substation Landscape Concept Plan and Figure 4.1-4: Boulevard Substation Landscape Concept Plan, that fulfill the objectives of the described Screening Plan. Further, the PEA included 11-inch by 17-inch color simulations of the proposed landscaping at 8 years as depicted in Attachment 4.1-B: Visual Simulations, as well as the scale of the screening elements and a detailed plant list. Therefore, this</p>	<p>VIS-3h. Screen substations and ancillary facilities. SDG&E shall <u>implement the Landscape Plan submitted as part of the PEA in order to provide a Screening Plan for screening vegetation, walls, and fences that reduces to reduce</u> visibility of the substations ancillary facilities and helps the facilities blend in with the landscape. The use of berms to facilitate project screening may also be incorporated into the Plan. SDG&E shall submit the Plan to the CPUC for review and approval at least 90 days before installing the landscape screening. If the CPUC notifies SDG&E that revisions to the Plan are needed before the Plan can be approved, within 30 days of receiving that notification, SDG&E shall prepare and submit for review and approval a revised Plan. The plan shall</p>	<p>VIS-3h. Screen substations. SDG&E shall implement the Landscape Plan submitted as part of the PEA in order to reduce visibility of the substations and help the facilities blend in with the landscape.</p>

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				measure should be revised to require implementation of SDG&E's existing Landscape Plans.	include but not necessarily be limited to: <ul style="list-style-type: none"> An 11 x 17 inch color simulation of the proposed landscaping at 5 years A plan view to scale depicting the project and the location of screening elements A detailed list of any plants to be used, their size and age at planting, the expected time to maturity, and the expected height at 5 years and at maturity 	
21.	D.3 Visual Resources	D.3-139	MM VIS-3j	The second bullet requires that no new access roads be constructed such that they directly approach existing or proposed towers in a straight line from sensitive viewing locations immediately downhill of the structures. However, the ability to safely make turns with construction, operations, and maintenance vehicles, as well as avoid hydrological, cultural, and/or biological resources in the area, was already taken into account during the design phase. Thus, the ability to change road design to comply with this measure is constrained by these factors and this measure should be revised accordingly.	VIS-3j. Reduce potential transmission conductor visibility and visual contrast. The following design measures shall be applied to all new structure locations, conductors, and re-conducted spans to reduce the degree of visual contrast caused by the new facilities: <ul style="list-style-type: none"> All new conductors and re-conducted spans to be non-specular to reduce conductor visibility and visual contrast No new access roads shall be constructed such that they directly approach existing or proposed towers in a straight line from sensitive viewing locations immediately downhill of the structures 	VIS-3j. Reduce potential transmission conductor visibility and visual contrast. The following design measures shall be applied to all new structure locations, conductors, and re-conducted spans to reduce the degree of visual contrast caused by the new facilities: <ul style="list-style-type: none"> All new conductors and re-conducted spans to be non-specular to reduce conductor visibility and visual contrast
22.	D.3 Visual Resources	D.3-140	MM VIS-3l	This measure provides for consultation between SDG&E and affected property owners regarding structure siting to reduce land use and visual impacts. However, consultation with affected property owners was already conducted during the design phase. Further, structures have already been sited to avoid view blockage to the extent possible. Their locations also take into account avoidance of sensitive resources. Thus, the portion of the measure requiring consultation with property owners should be omitted.	VIS-3l. Reduce potential view blockage and visual contrasts of structures. Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence, where feasible. SDG&E will consult with affected property owners on structure siting to reduce land use and visual impacts.	VIS-3l. Reduce potential view blockage and visual contrasts of structures. Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence, where feasible.
23.	D.3 Visual Resources	D.3-140	MM VIS-3m	MM VIS-3m requires a Landscape Treatment Plan. This plan is not applicable to the ECO Substation Project since the only place where ornamental trees or native trees would be removed are within the Boulevard Substation site, and a Landscape Plan was prepared as part of the PEA. Figure 4.1-4 in the PEA provides a Landscape Plan for the Boulevard Substation, including the replacement of trees. This MM should be omitted or the EIR/EIS should acknowledge that a Landscape Plan has been prepared and would be updated if there are changes as a result of the Final EIR/EIS.	In the event that ornamental or native trees within the project area will be removed due to project design and grading, the project applicant shall prepare a Landscape Treatment Plan to be submitted with the Surface Treatment Plan.	Not Applicable. The entire measure should be omitted.

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D.7 – Cultural Resources						
24.	D.7 Cultural Resources	D.7-100	MM CUL-1A	SDG&E recommends including additional flexibility in MM CUL-1A to address potential Native American concerns regarding culturally significant resources and areas that may arise during tribal consultation.	CUL-1A. Develop and Implement a Historic Properties–Cultural Resources Treatment Program. A Historic Properties–Cultural Resources Treatment Program (HPTP-CRTP) shall be prepared to avoid or mitigate impacts for significant cultural resources pursuant to Section 106 Guidelines. An MOA/PA shall be developed among all federal, state, and local agencies to implement the HPTP-CRTP. The HPTP-CRTP shall also define any additional areas that are considered to be of high sensitivity for discovery of buried NRHP-eligible historic properties and CRHR-eligible historic resources, including burials, cremations, or sacred features. The HPTP-CRTP shall detail provisions completing testing required to completed eligibility determinations. If NRHP-eligible historic properties and CRHR-eligible historic resources are not avoidable, the HPTP-CRTP shall provide for evaluating NRHP and CRHR eligibility, consulting with Native Americans about site treatment, working with engineers to avoid resources; suggest various options for reducing adverse effects, including minor route revisions to avoid and minimize impacts to resources, where practicable; and outline a data recovery mitigation plan that would include research design, field sampling, laboratory analysis, reporting, curation, and dissemination of results. Route revisions to avoid sensitive resources may include use of existing paved roads and/or overhead facilities. A Native American monitor may be required at culturally sensitive locations specified by the lead agency following government-to-government consultation with Native American tribes. The monitoring plan in the CRTP shall indicate the locations where Native American monitors shall be required and shall specify the tribal affiliation of the required Native American monitor for each location.	CUL-1A. Develop and Implement a Historic Properties–Cultural Resources Treatment Program. A Historic Properties–Cultural Resources Treatment Program (HPTP-CRTP) shall be prepared to avoid or mitigate impacts for significant cultural resources pursuant to Section 106 Guidelines. An MOA/PA shall be developed among all federal, state, and local agencies to implement the HPTP-CRTP. The HPTP-CRTP shall also define any additional areas that are considered to be of high sensitivity for discovery of buried NRHP-eligible historic properties and CRHR-eligible historic resources, including burials, cremations, or sacred features. The HPTP-CRTP shall detail provisions completing testing required to completed eligibility determinations. If NRHP-eligible historic properties and CRHR-eligible historic resources are not avoidable, the HPTP-CRTP shall provide for evaluating NRHP and CRHR eligibility, consulting with Native Americans about site treatment, working with engineers to avoid resources; suggest various options for reducing adverse effects, including minor route revisions to avoid and minimize impacts to resources, where practicable; and outline a data recovery mitigation plan that would include research design, field sampling, laboratory analysis, reporting, curation, and dissemination of results. Route revisions to avoid sensitive resources may include use of existing paved roads and/or overhead facilities. A Native American monitor may be required at culturally sensitive locations specified by the lead agency following government-to-government consultation with Native American tribes. The monitoring plan in the CRTP shall indicate the locations where Native American monitors shall be required and shall specify the tribal affiliation of the required Native American monitor for each location.
25.	D.7 Cultural Resources	D.7-102	MM CUL-3	The stipulations in MM CUL-3 cite the incorrect legislation and indicate that government-to-government consultation is with interested parties and individuals; this is incorrect as government-to-government is between governments, and not with an individual. The measure should be revised accordingly.	CUL-3. Conduct Complete c Consultation as required with Native American and other Traditional Groups: As required by NHPA Section 106, and assist the federal government, as requested, with the applicant shall provide assistance to the lead agency, as requested, to complete required government-to-government consultation with interested Native American tribes. and individuals (Executive Memorandum of April 29, 1994, and Section 106 of the NHPA) and other traditional groups to assess the impact of the approved project on TCPs or other resources of Native American concerns. As required in compliance with federal laws and regulations, directed by the lead agency, the applicant shall undertake required treatments, studies, or other actions that result from such consultation.	CUL-3. Conduct consultation as required by NHPA Section 106 and assist the federal government, as requested, with government-to-government consultation with Native American tribes. As required in compliance with federal laws and regulations, the applicant shall undertake required treatments, studies, or other actions that result from such consultation. Actions that are required during or after construction shall be defined, detailed, and scheduled in the Historic Properties–Cultural Resources Treatment Plan.

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					<p>Actions that are required during or after construction shall be defined, detailed, and scheduled in the Historic Properties– Cultural Resources Treatment Plan, in consultation with the applicant, and may include the following:</p> <ul style="list-style-type: none"> • Information regarding further developments in the projects; • Participation by Native American monitors in any additional surveys, archaeological excavations, and ground-disturbing construction activities; • Return of any prehistoric artifacts requiring repatriation under the NAGPRA that are recovered to the appropriate tribe after they have been analyzed by archaeologists; • The right to inspect sites where human remains are discovered and to determine the treatment and disposition of the remains; and • Copies of all site records, survey reports, or other environmental documents. 	
D.8 – Noise						
26.	D.8 Noise	D.8-58	MM NOI-1	As stated in the PEA, blasting may be necessary if conventional construction techniques are not adequate in an area with shallow bedrock. However, it would not be known if or where blasting is required until construction has commenced and equipment is on site to excavate the overburden. Therefore, noticing should be conducted prior to blasting activities, rather than prior to construction. Additionally, MMs NOI-1 and HAZ-4b both require blasting plans. SDG&E recommends that the text of these two measures be reconciled into one for consistency in approach and to ensure there are no discrepancies. The applicable portions of MM NOI-1 have, therefore, been combined with those in MM HAZ-4b for implementation of one blasting plan.	<p>MM NOI-1 Blasting Plan: SDG&E will prepare a blasting plan that will reduce impacts associated with construction related noise and vibrations related to blasting. The blasting plan will be site specific, based on general and exact locations of required blasting and the results of a project specific geotechnical investigation. The blasting plan will include a description of the planned blasting methods, an inventory of receptors potentially affected by the planned blasting, and calculations to determine the area affected by the planned blasting. Noise calculations in the blasting plan will account for blasting activities and all supplemental construction equipment.</p> <p>The blasting plan will include a schedule to demonstrate, where feasible, construction blasting to occur infrequently enough that it will not exceed the County’s impulsive noise standard because blasting would not occur for more than 25% (15 minutes) during a 1-hour period due to the short time duration of a blast. Where this is not possible, other construction blasting would be coordinated with impacted building occupants to occur in their absence, or at other acceptable times, to avoid nuisance or annoyance complaints. If necessary, the applicant will temporarily relocate impacted residents on an as-needed basis for the duration of the blasting activities.</p>	See the revisions to MM HAZ-4b in Comment 30.

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					<p>To ensure that potentially impacted residents are informed, the applicant will provide notice by mail to all property owners within 300 feet of the project at least 1 week prior to the start of construction activities. Blasting would be completed between 7 a.m. and 7 p.m. to be compliant with County of San Diego noise ordinances. A rock anchoring or min-pile system may be used to reduce the risk of damage to structures during blasting activities. Fair compensation for lost use will be provided to the property owner. If adversely affected, structures shall be restored to an equivalent condition, and fair compensation for lost use will be provided to the owner. If necessary, the use of portable noise barriers to reduce excessive noise impacts shall be used between the source and affected occupied properties. Noise barriers that break the line of sight would provide 5 dB attenuation. Increasing the height of the barrier would increase the attenuation of the barrier. A 5 dBA to 10 dBA attenuation is considered reasonably feasible. Supplemental construction equipment, such as drill rigs, may be used to support blasting. At a distance of 80 feet, drill rig noise emissions are approximately 75 dBA Leq.</p>	
D.9 – Transportation and Traffic						
27.	D.9 Transportation and Traffic	D.9-80	MM TRA-1	Regarding the fifth bullet on page D.9-81, requiring SDG&E to “coordinate in advance,” this portion of the measure should be omitted, as there would be no overall change because these activities would occur at night when traffic on freeways and local roads in the area is minimal. Also, the timing of many of the activities is dictated by the California Department of Transportation and California Independent System Operator, so coordination between the applicants would not likely be able to accomplish much.	<p>TRA-1. Prepare and implement a Traffic Control Plan. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • SDG&E shall encourage carpooling to the construction site to reduce personal vehicle traffic in the project area to the greatest extent possible. • SDG&E will consider the specific object sizes, weights, origin, destination, and unique handling requirements, and evaluate alternative transportation approaches. • Measures such as informational signs and flaggers shall be implemented when equipment may result in blocked roadways, and traffic cones or similar shall be implemented to identify any necessary changes in temporary lane configuration. • Flaggers and directional guidance for bicyclists along Old Highway 80 shall be used. • All Caltrans’ standards for utility encroachments shall be met. • The plan shall be prepared in accordance with Caltrans’ Manual on Uniform Traffic Control Devices and the Work Area Traffic Control Handbook (WATCH) Manual. • Clearances or overhead crossings shall conform to regulations of the CPUC and BLM, and the number of 	<p>TRA-1. Prepare and implement a Traffic Control Plan. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • SDG&E shall encourage carpooling to the construction site to reduce personal vehicle traffic in the project area to the greatest extent possible. • SDG&E will consider the specific object sizes, weights, origin, destination, and unique handling requirements, and evaluate alternative transportation approaches. • Measures such as informational signs and flaggers shall be implemented when equipment may result in blocked roadways, and traffic cones or similar shall be implemented to identify any necessary changes in temporary lane configuration. • Flaggers and directional guidance for bicyclists along Old Highway 80 shall be used. • All Caltrans’ standards for utility encroachments shall be met. • The plan shall be prepared in accordance with Caltrans’ Manual on Uniform Traffic Control Devices and the Work Area Traffic Control Handbook (WATCH) Manual. • Clearances or overhead crossings shall conform to regulations of the CPUC and BLM, and the number of

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					<p>crossings shall be minimized.</p> <ul style="list-style-type: none"> • New installations under an existing roadbed shall be made by the boring-and-jacking method. No trenching under the traveled way will occur. • For freeways and expressways, the placement of longitudinal encroachments is prohibited within controlled-access rights-of-way (ROWs). • Utilities shall not be located in median areas. • Transverse crossings shall be normal (90°) to the highway alignment where practical. If impractical, skews of up to 30° from normal may be allowed. • Supports for overhead lines crossing freeways shall be located outside the controlled-access ROW and not on cut-or-fill slopes, and shall not impair sight distances. All installations shall be placed as close to the ROW line as possible. Aboveground utilities shall be outside of the clear recovery zone (20 feet from edge-of-travel way for conventional highways and 30 feet for freeways and expressways). Allowance shall be made for future widening of the highways. • New installations shall not impair sight distances. • SDG&E shall coordinate in advance with the applicants for the other two connected actions. This effort shall include coordinating the timing of construction of the various projects to reduce potential conflicts. • SDG&E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. The County will then notify respective police, fire, ambulance, and paramedic services. SDG&E shall notify counties and cities of the proposed locations, nature, timing, and duration of any construction activities, and advise of any access restrictions that could impact their effectiveness. <p>SDG&E shall provide a draft copy of the Traffic Control Plan to the agencies listed for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to SDG&E, and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be submitted to the CPUC and BLM with input from commenting agencies and provided to SDG&E for implementation during all construction activities.</p>	<p>crossings shall be minimized.</p> <ul style="list-style-type: none"> • New installations under an existing roadbed shall be made by the boring-and-jacking method. No trenching under the traveled way will occur. • For freeways and expressways, the placement of longitudinal encroachments is prohibited within controlled-access rights-of-way (ROWs). • Utilities shall not be located in median areas. • Transverse crossings shall be normal (90°) to the highway alignment where practical. If impractical, skews of up to 30° from normal may be allowed. • Supports for overhead lines crossing freeways shall be located outside the controlled-access ROW and not on cut-or-fill slopes, and shall not impair sight distances. All installations shall be placed as close to the ROW line as possible. Aboveground utilities shall be outside of the clear recovery zone (20 feet from edge-of-travel way for conventional highways and 30 feet for freeways and expressways). Allowance shall be made for future widening of the highways. • New installations shall not impair sight distances. • SDG&E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. The County will then notify respective police, fire, ambulance, and paramedic services. SDG&E shall notify counties and cities of the proposed locations, nature, timing, and duration of any construction activities, and advise of any access restrictions that could impact their effectiveness. <p>SDG&E shall provide a draft copy of the Traffic Control Plan to the agencies listed for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to SDG&E, and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be submitted to the CPUC and BLM with input from commenting agencies and provided to SDG&E for implementation during all construction activities.</p>

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D.10 – Public Health and Safety						
28.	D.10 Public Health and Safety	D.10 -138	MM HAZ-1b	<p>MM HAZ-1b requires a Health and Safety Program for each phase of construction be developed and submitted to the CPUC and BLM at least 30 days prior to construction. This measure is unnecessarily inconsistent and disproportionate to the impacts identified in the EIR/EIS. The EIR/EIS analysis does not conclude that the existing health and safety regulations administered by the Occupational Safety and Health Administration (OSHA) and the San Diego County Department of Environmental Health are insufficient to protect worker and public safety. The CPUC has acknowledged these existing health and safety requirements in past analyses of similar SDG&E projects and did not require a Health and Safety Program.</p> <p>Utility companies typically require their contractors to develop and implement safety plans that ensure compliance with OSHA and other regulations. These plans would not be available prior to the final design, as stipulated in the measure, since the contractors would not be identified at that stage of the Project. Therefore, this measure is infeasible to implement as described. Further, Sempra Energy has a very thorough and comprehensive Health and Safety Program that would be implemented during the operation phase as corporate policy. An additional plan is unnecessary for the post-construction phase of the Project.</p> <p>This measure should be revised to be more concise and state that SDG&E and its contractors would implement a safety plan in accordance with OSHA regulations. The contents of the plan should be omitted from the MM.</p>	<p>HAZ-1b. Health and Safety Program. Prior to approval of final construction plans, SDG&E shall prepare a Health and Safety Program <u>in accordance with OSHA regulations. SDG&E shall implement Sempra Energy’s Health and Safety Program during the operation phase of the project, in accordance with SDG&E’s corporate policy. for each applicable phase of the project (i.e., construction, operation, and decommissioning).</u> The program shall be developed to protect both workers and the general public during all phases of the project. The program shall be developed to protect both workers and the general public during all phases of the project. The program shall be implemented to educate construction workers about the hazards associated with the particular project site and the safety measures that must be taken to prevent injury. The program shall include standards regarding occupational safety, safe work practices for each task, hazard training requirements for workers, and mechanisms for documentation and reporting.</p> <p>Regarding occupational health and safety, the program shall identify all applicable federal and state occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; OSHA standard practices for safe use of explosives and blasting agents; and measures for reducing occupational EMF exposures); establish fire safety evacuation procedures; and define safety performance standards (e.g., electrical system standards and lightning protection standards). The program shall include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. The program shall include worker training regarding how to identify potentially contaminated soils and/or groundwater. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies shall be established.</p> <p>The program shall identify requirements for temporary fencing around staging areas, storage yards, and excavation areas during construction or decommissioning activities. Such fencing shall be designed to restrict transient traffic, off-highway vehicle (OHV) use, and the general public from accessing areas under construction and shall be removed once construction or decommissioning activities are complete. The program shall also identify appropriate measures to be taken during operation of the project to limit public access to hazardous facilities (e.g., permanent fencing, locked access).</p>	<p>HAZ-1b. Health and Safety Program. Prior to approval of final construction plans, SDG&E shall prepare a Health and Safety Program in accordance with OSHA regulations. SDG&E shall implement Sempra Energy’s Health and Safety Program during the operation phase of the project, in accordance with SDG&E’s corporate policy. The program shall be submitted to BLM and CPUC at least 30 days prior to construction.</p>

Attachment B – Proposed Mitigation Measure Revisions
 East County Substation Project Draft EIR-EIS



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					activities. The program shall be submitted to BLM and CPUC at least 30 days prior to construction.	
29.	D.10 Public Health and Safety	D.10 -139	MM HAZ-1c	This measure is inconsistent and disproportionate to the impacts identified in the EIR/EIS. It is presumed that this measure is for management of non-hazardous waste since MM HAZ-1a requires a Hazardous Materials Management Plan. However, the EIR/EIS analysis does not conclude that existing regulations for non-hazardous waste management and Sempra’s Water Quality BMP Manual that was included as part of the PEA are insufficient to reduce impacts to a less-than-significant level. The CPUC has acknowledged that impacts from non-hazardous waste is not a significant impact requiring mitigation in past analysis of similar SDG&E projects, such as the Otay Metro Power Loop Project and Silvergate Transmission Substation Project, and did not require a Waste Management Plan in addition to Sempra’s BMP Water Quality Manual and Hazardous Materials Management Plan for these projects. Therefore, this measure should be omitted.	HAZ-1c. Waste Management Plan. Prior to approval of final construction plans, SDG&E shall prepare a Waste Management Plan, which shall determine waste procedures, waste storage locations, waste specific management and disposal requirements, inspection procedures, and waste minimization procedures. SDG&E shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to the plan for all construction activities. The plan shall be submitted to CPUC and BLM at least 30 days prior to construction.	Not Applicable. The entire measure should be omitted.
30.	D.10 Public Health and Safety	D.10 -141	MM HAZ-4b	Both MM NOI-1 and MM HAZ-4b require a blasting plan for the Project. SDG&E recommends that the text of these two measures be reconciled into one for consistency in approach and to ensure there are no discrepancies in implementation. Applicable portions of MM NOI-1 have therefore, been combined with MM HAZ-4b to provide one consolidated blasting plan.	HAZ-4b. Blasting Plan. If blasting is deemed necessary for the construction of project components, SDG&E shall conduct a pre-blast survey and prepare a blasting plan <u>that shall reduce impacts associated with construction-related noise and vibrations related to blasting. The blasting plan shall be site-specific, based on general and exact locations of required blasting and the results of the project-specific geotechnical investigation.</u> A written report of the pre-blast survey and final blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions: The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by SDG&E. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey Notification that blasting would occur shall be provided <u>by mail</u> to all owners of the identified structures to be surveyed, <u>at least one week</u> prior to commencement of blasting. SDG&E will conduct these activities in compliance with the local noise ordinance. The pre-blast survey shall be included in the final blasting plan.	HAZ-4b. Blasting Plan. If blasting is deemed necessary for the construction of project components, SDG&E shall conduct a pre-blast survey and prepare a blasting plan that shall reduce impacts associated with construction-related noise and vibrations related to blasting. The blasting plan shall be site-specific, based on general and exact locations of required blasting and the results of the project-specific geotechnical investigation. A written report of the pre-blast survey and final blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions: The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by SDG&E. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey Notification that blasting would occur shall be provided by mail to all owners of the identified structures to be surveyed, at least one week prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.

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					<p>The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</p> <p>The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed turbine foundation locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. SDG&E, its general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast. <u>The blasting plan shall include a schedule to demonstrate, where feasible, construction blasting to occur infrequently enough that it will not exceed the County of San Diego’s impulsive noise standard because blasting would not occur for more than 25% (15 minutes) during a 1-hour period due to the short time duration of a blast. Where this is not possible, other construction blasting shall be coordinated with impacted building occupants to occur in their absence, or at other acceptable times, to avoid nuisance or annoyance complaints. If necessary, the applicant shall temporarily relocate impacted residents on an as-needed basis for the duration of the blasting activities.</u></p> <p><u>Blasting shall be completed between 7 a.m. and 7 p.m. in compliance with County of San Diego Noise Ordinances. A rock anchoring or min-pile system may be used to reduce the risk of damage to structures during blasting activities. If adversely affected, structures shall be restored to an equivalent condition, and fair compensation for lost use shall be provided to the owner. If necessary, the use of portable noise barriers to reduce excessive noise impacts shall be used between the source and affected occupied properties. Noise barriers that break the line of sight would provide 5 dB attenuation. Increasing the height of the barrier would increase the attenuation of the barrier. A 5 dBA to 10 dBA attenuation is considered reasonably feasible. Supplemental construction</u></p>	<p>The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</p> <p>The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. SDG&E, its general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast. The blasting plan shall include a schedule to demonstrate, where feasible, construction blasting to occur infrequently enough that it will not exceed the County of San Diego’s impulsive noise standard because blasting would not occur for more than 25% (15 minutes) during a 1-hour period due to the short time duration of a blast. Where this is not possible, other construction blasting shall be coordinated with impacted building occupants to occur in their absence, or at other acceptable times, to avoid nuisance or annoyance complaints. If necessary, the applicant shall temporarily relocate impacted residents on an as-needed basis for the duration of the blasting activities.</p> <p>Blasting shall be completed between 7 a.m. and 7 p.m. in compliance with County of San Diego Noise Ordinances. A rock anchoring or min-pile system may be used to reduce the risk of damage to structures during blasting activities. If adversely affected, structures shall be restored to an equivalent condition, and fair compensation for lost use shall be provided to the owner. If necessary, the use of portable noise barriers to reduce excessive noise impacts shall be used between the source and affected occupied properties. Noise barriers that break the line of sight would provide 5 dB attenuation. Increasing the height of the barrier would increase the attenuation of the barrier. A 5 dBA to 10 dBA attenuation is considered reasonably feasible. Supplemental construction equipment, such as drill rigs, may be used to support blasting. At a distance of 80 feet, drill rig noise emissions are approximately 75 dBA Leq.</p>

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					<u>equipment, such as drill rigs, may be used to support blasting. At a distance of 80 feet, drill rig noise emissions are approximately 75 dBA Leq.</u>	
D.11 – Air Quality						
No Comments						
D.12 – Water Resources						
31.	D.12 Water Resources	D.12 -81	MM HYD-2	This portion of the MM should be omitted, as it is unnecessary to determine groundwater levels at every excavation site. The Project is located within an arid desert transitional area in eastern San Diego County with deep groundwater levels. The test well installed in 2008 within the ECO Substation Site, at a depth of 50 feet, is dry. If groundwater is encountered, SDG&E would obtain the proper permits and would employ BMPs during dewatering activities, in accordance MM HYD-2.	HYD-2. Avoidance and preventative measures to protect local groundwater during excavation. Prior to excavation, a qualified geologist/hydrologist shall determine the depth of groundwater in areas where excavation would occur. The project shall be designed to avoid areas of shallow groundwater where feasible. In such areas where groundwater cannot be avoided during excavation, the site shall be dewatered during construction, and materials that could contaminate the groundwater shall be kept at least 200 feet from the dewatering activities. An NPDES permit shall be obtained for proper disposal of water. Treatment may be required prior to discharge.	HYD-2. Avoidance and preventative measures to protect local groundwater during excavation. In such areas where groundwater cannot be avoided during excavation, the site shall be dewatered during construction, and materials that could contaminate the groundwater shall be kept at least 200 feet from the dewatering activities. An NPDES permit shall be obtained for proper disposal of water. Treatment may be required prior to discharge.
32.	D.12 Water Resources		MM HYD-3	SDG&E will comply with all applicable laws and regulations; thus, stating that a County Major Use Permit will be secured is duplicative and unnecessary.	HYD-3. Identification of sufficient water supply. Prior to construction SDG&E will prepare comprehensive documentation that identifies one or more confirmed, reliable water sources that when combined meet the project’s full water East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects supply construction needs. Documentation will consist of the following: <ul style="list-style-type: none"> Preparation of a groundwater study. For well water that is to be used, the applicant will commission a groundwater study by a qualified hydrogeologist to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner’s permission) in the vicinity of proposed well location/water sources. The groundwater study will evaluate aquifer properties and aquifer storage. The groundwater study will estimate short and long-term well water supplies from each well proposed to be used, and documentation indicating that each well is capable of producing the total amount of water to be supplied for construction from each well. The groundwater study will estimate short- and long-term impacts of the use of the well(s) on the local groundwater production (short-term extraction for construction water and ongoing O&M water), on all project wells, and on other wells in the project area. The groundwater study will include an assessment of the potential for subsidence brought on by project-related water use in the area. The applicant will 	HYD-3. Identification of sufficient water supply. Prior to construction SDG&E will prepare comprehensive documentation that identifies one or more confirmed, reliable water sources that when combined meet the project’s full water East County Substation/Tule Wind/Energia Sierra Juarez Gen-Tie Projects supply construction needs. Documentation will consist of the following: <ul style="list-style-type: none"> Preparation of a groundwater study. For well water that is to be used, the applicant will commission a groundwater study by a qualified hydrogeologist to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner’s permission) in the vicinity of proposed well location/water sources. The groundwater study will evaluate aquifer properties and aquifer storage. The groundwater study will estimate short and long-term well water supplies from each well proposed to be used, and documentation indicating that each well is capable of producing the total amount of water to be supplied for construction from each well. The groundwater study will estimate short- and long-term impacts of the use of the well(s) on the local groundwater production (short-term extraction for construction water and ongoing O&M water), on all project wells, and on other wells in the project area. The groundwater study will include an assessment of the potential for subsidence brought on by project-related water use in the area. The applicant will

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					<p>provide demonstration of compliance will all applicable laws and regulations and will obtain a County of San Diego Major Use Permit for use of any proposed well prior to construction.</p> <ul style="list-style-type: none"> Documentation of Purchased Water Source(s). For water that is to be purchased from one or more water/utility district(s), the applicant shall provide written documentation from such district(s) indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The Sweetwater Authority has provided written confirmation of water availability to support the project. <p>Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project.</p>	<p>provide demonstration of compliance will all applicable laws and regulations.</p> <ul style="list-style-type: none"> Documentation of Purchased Water Source(s). For water that is to be purchased from one or more water/utility district(s), the applicant shall provide written documentation from such district(s) indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The Sweetwater Authority has provided written confirmation of water availability to support the project. <p>Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project.</p>
33.	D.12 Water Resources	D.12 -82	MM HYD-4	<p>SDG&E would obtain permit coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (2009-0009-DWQ) and would prepare and implement a SWPPP accordingly. Due to compliance with the NPDES General Permit, a Stormwater Management Plan is not required for the Project, nor was it required for construction of the recent Sunrise Powerlink Project. Implementation of the SWPPP would ensure that the creation of new impervious areas would not have a significant impact resulting in flooding or increased erosion downstream. Therefore, this mitigation measure should be revised to require that SDG&E meet current local and/or state applicable post-construction requirements.</p>	<p>HYD-4. Preparation of a Stormwater Management Plan. SDG&E shall comply with any applicable requirement of the County of San Diego Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) to Preparation of a Stormwater Management Plan. SDG&E shall commission a Storm Water Management Plan (SWMP), an SWMP in compliance with the County of San Diego Major Storm Water Management Plan. The SWMP shall be project specific and developed in conjunction with project design. The SWMP shall include site design BMPs that, where applicable, shall:</p> <p>Maintain predevelopment rainfall runoff characteristics. The BMPs <u>to consider for incorporation may include</u> shall:</p> <ul style="list-style-type: none"> Locate the project and road improvement alignments to avoid or minimize impacts to receiving waters or to increase the preservation of critical (or problematic) areas such as floodplains, steep slopes, wetlands, and areas with erosive or unstable soil conditions Minimize the project’s impervious footprint. Conserve natural and critical areas, such as floodplains, steep slopes, wetlands, and areas with erosive and unstable soil conditions Where landscape is proposed, drain rooftops, impervious sidewalks, walkways, trails, and patios into adjacent landscaping 	<p>HYD-4. Preparation of a Stormwater Management Plan. SDG&E shall comply with any applicable requirement of the County of San Diego Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) to commission a Storm Water Management Plan (SWMP). The SWMP shall be project specific and developed in conjunction with project design. The SWMP shall include site design BMPs that, where applicable, shall:</p> <ul style="list-style-type: none"> Maintain predevelopment rainfall runoff characteristics. The BMPs to consider for incorporation may include: <ul style="list-style-type: none"> Locate the project and road improvement alignments to avoid or minimize impacts to receiving waters or to increase the preservation of critical (or problematic) areas such as floodplains, steep slopes, wetlands, and areas with erosive or unstable soil conditions Minimize the project’s impervious footprint. Conserve natural and critical areas, such as floodplains, steep slopes, wetlands, and areas with erosive and unstable soil conditions Where landscape is proposed, drain rooftops, impervious sidewalks, walkways, trails, and patios into adjacent landscaping Design and locate roadway structures and bridges to reduce the amount of work in live streams, and minimize the construction impacts

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
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					<ul style="list-style-type: none"> ○ Design and locate roadway structures and bridges to reduce the amount of work in live streams, and minimize the construction impacts ○ Implement the following methods to minimize erosion from slopes: <ul style="list-style-type: none"> ▪ Disturb existing slopes only when necessary ▪ Minimize cut-and-fill areas to reduce slope lengths ▪ Incorporate retaining walls to reduce steepness of slopes or to shorten slopes ▪ Provide benches or terraces on high cut-and-fill slopes to reduce concentration of flows ▪ Round and shape slopes to reduce concentrated flow ▪ Collect concentrated flows in stabilized drains and channels. ● Protect slopes and channels. The BMPs <u>to consider for incorporation may include</u> shall: <ul style="list-style-type: none"> ○ Minimize disturbances to natural drainages ○ Convey runoff safely from the tops of slopes ○ Vegetate slopes with native or drought-tolerant vegetation ○ Stabilize permanent channel crossings ○ Install energy dissipaters, such as riprap, at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion. Energy dissipaters shall be installed in such a way as to minimize impacts to receiving waters. ○ Include other design principles that are comparable and equally effective. ● The SWMP shall also incorporate Low Impact Development Features into the project. <u>The BMPs to consider for incorporation may include, but are including but</u> not limited to: <ul style="list-style-type: none"> ○ Preserve well-draining soils (Type A or B) ○ Preserve significant trees ○ Set back development envelope from drainages ○ Restrict heavy construction equipment access to planned green/open space areas 	<ul style="list-style-type: none"> ○ Implement the following methods to minimize erosion from slopes: <ul style="list-style-type: none"> ▪ Disturb existing slopes only when necessary ▪ Minimize cut-and-fill areas to reduce slope lengths ▪ Incorporate retaining walls to reduce steepness of slopes or to shorten slopes ▪ Provide benches or terraces on high cut-and-fill slopes to reduce concentration of flows ▪ Round and shape slopes to reduce concentrated flow ▪ Collect concentrated flows in stabilized drains and channels. ● Protect slopes and channels. The BMPs to consider for incorporation may include: <ul style="list-style-type: none"> ○ Minimize disturbances to natural drainages ○ Convey runoff safely from the tops of slopes ○ Vegetate slopes with native or drought-tolerant vegetation ○ Stabilize permanent channel crossings ○ Install energy dissipaters, such as riprap, at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion. Energy dissipaters shall be installed in such a way as to minimize impacts to receiving waters. ○ Include other design principles that are comparable and equally effective. ● The SWMP shall also incorporate Low Impact Development Features into the project. The BMPs to consider for incorporation may include, but are not limited to: <ul style="list-style-type: none"> ○ Preserve well-draining soils (Type A or B) ○ Preserve significant trees ○ Set back development envelope from drainages ○ Restrict heavy construction equipment access to planned green/open space areas ○ Re-till soils compacted by construction vehicles/equipment ○ Collect and reuse upper soil layers of development site containing organic materials

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
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					<ul style="list-style-type: none"> ○ Re-till soils compacted by construction vehicles/equipment ○ Collect and reuse upper soil layers of development site containing organic materials ○ Curb cuts to landscaping ○ Use rural swales ○ Use concave median ○ Use permeable pavements ○ Pitch pavements toward landscaping ○ Use cisterns and rain barrels ○ Downspout to swale ○ Use vegetated roofs ○ Use soil amendments ○ Reuse native soils ○ Use smart irrigation systems ○ Use street trees (HDR 2009b). <p>The SWMP shall ensure that the project follows CDFG guidelines for culverts to minimize long-term maintenance and meet a 10-year rain event to minimize the trapping of sediment.</p>	<ul style="list-style-type: none"> ○ Curb cuts to landscaping ○ Use rural swales ○ Use concave median ○ Use permeable pavements ○ Pitch pavements toward landscaping ○ Use cisterns and rain barrels ○ Downspout to swale ○ Use vegetated roofs ○ Use soil amendments ○ Reuse native soils ○ Use smart irrigation systems ○ Use street trees (HDR 2009b). <p>The SWMP shall ensure that the project follows CDFG guidelines for culverts to minimize long-term maintenance and meet a 10-year rain event to minimize the trapping of sediment.</p>
34.	D.12 Water Resources	D.12 -84	MM HYD-5	SDG&E is not proposing to cross any flowing creeks as part of the ECO Substation Project and none of the alternatives being considered by the CPUC would cross flowing creeks. SDG&E is proposing to span dry washes. However, in analyzing an underground alternative, this measure references both jack-and-bore and horizontal directional drilling (HDD), which are very different construction techniques. HDD would not be feasible for many of the crossings due to the very short crossing distance. Jack and bore is an invasive crossing technique used for crossing relatively short distances, such as roads, and results in substantial ground disturbance that cannot be justified for crossing dry washes. The duration is several times longer than open-cut, and in the case of dry washes, would result in greater environmental impacts. This measure should be omitted, even as an alternative, since it introduces an unnecessary and unjustified impact.	<p>HYD-5: Implementation of creek crossing procedures. Creek crossing shall use jackand bore procedures to avoid direct impacts and shall be conducted in a manner that does not result in sediment laden discharge or hazardous materials release to the water body. The following measures shall be implemented during horizontal boring (jack and bore) operations:</p> <p>(1) Site preparation shall begin no more than 10 days prior to initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages.</p> <p>(2) Trench and/or bore pit spoil shall be stored a minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention).</p> <p>(3) Portable pumps and stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10 gallon fuel or oil capacity should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times.</p> <p>(4) Immediately following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall be left in place until</p>	Not Applicable. The entire measure should be omitted.

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					<p>restoration is deemed successful.</p> <p>(5) The applicant shall obtain the required permits prior to conducting work associated with horizontal directional drilling activities. Required permits may include ACOE CWA Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. The applicant shall implement all pre- and post-construction conditions identified in the permits issued for the horizontal directional drilling. The plan shall be submitted to the CPUC, BLM, and ACOE 60 days prior to construction.</p>	
35.	D.12 Water Resources	D.12 -84	MM HYD-6	HDD is not an appropriate crossing method for transmission lines under the dry washes that are present on the ECO Substation Project. Dry washes can typically be open-cut in a day with a small crew. HDD takes several weeks to set up and complete and would result in far greater environmental impacts than open-cutting. The measure is not applicable or appropriate to either the Project or any of the alternatives and should be omitted.	<p>HYD-6: Horizontal Directional Drill Contingency Plan. SDG&E shall prepare a Horizontal Directional Drill Contingency Plan to address procedures for containing an inadvertent release of drilling fluid (frac-out). The plan shall contain specific measures for monitoring frac-outs, for containing drilling mud, and for notifying agency personnel. The plan shall also discuss spoil stockpile management, hazardous materials storage and spill cleanup, sitespecific erosion and sediment control, and housekeeping procedures, as described in the SWPPP. The plan shall be submitted to the CPUC, BLM, and ACOE 60 days prior to construction.</p>	Not Applicable. The entire measure should be omitted.
D.13 – Geology, Mineral Resources, and Soils						
36.	D.13 Geology, Mineral Resources, and Soils	D.13 -64	MM GEO-1	<p>The contents of the Erosion Control and Sediment Control Plan are the same as what is required in MM HYD-1, which requires the preparation of a SWPPP. It is unclear why MM HYD-1 does not reduce the identified impact to a less-than-significant level, triggering the preparation of another plan. Having two plans that are identical undermines the mitigation monitoring, compliance, and reporting program and makes implementation unnecessarily difficult. Therefore, the portion of MM GEO-1 requiring an Erosion Control and Sediment Transport Control Plan should be omitted.</p> <p>In addition, MM GEO-1 requires revegetation plans and grading plans be submitted to the CDFG and USACE. Both of these agencies have specific permitting processes with their own submittal requirements. The stipulation in this measure is unnecessary and has the potential to conflict with the regulatory process of these resource protection agencies. Thus, it should also be omitted.</p>	<p>GEO-1: <u>Decompaction</u>. Erosion Control and Sediment Transport Control Plan. The Erosion Control and Sediment Transport Control Plan would be included with the project grading plans submitted to the County for review and comment. The plan would be submitted to CPUC and BLM a minimum of 60 days prior to project design and would be prepared in accordance with the standards provided in the Manual of Erosion and Sedimentation Control Measures and consistent with practices recommended by the Resource Conservation District of Greater San Diego County. Implementation of the plan would help stabilize soil in graded areas and waterways and reduce erosion and sedimentation. The plan would designate BMPs that would be implemented during construction activities. Erosion control efforts, such as hay bales, water bars, covers, sediment fences, sensitive area access restrictions (e.g., flagging), vehicle mats in wet areas, and retention/settlement ponds, would be installed before extensive soil clearing and grading begins. Appropriate stabilization measures, such as mulching or seeding, would be used to protect exposed areas during construction activities. Revegetation plans, the design and location of retention ponds, and grading plans would be submitted to the CDFG and ACOE for review in the event of construction near waterways.</p> <p>In disturbed areas where construction equipment has caused</p>	GEO-1. Decompaction. In disturbed areas where construction equipment has caused compaction of soils (e.g., staging areas, structure sites, temporary spur roads, etc.), soils would be decompacted as necessary prior to seeding, and reclamation would occur to enhance revegetation and reduce potential for erosion.

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					compaction of soils (e.g., staging areas, structure sites, temporary spur roads, etc.), soils would be decompacted as necessary prior to seeding, and reclamation would occur to enhance revegetation and reduce potential for erosion.	
37.	D.13 Geology, Mineral Resources, and Soils	D.13 -64	MM GEO-2	A Geotechnical Report was previously prepared for the ECO Substation Project and was submitted as Attachment 4.6-A: Interim Geotechnical Investigation with the PEA. For the preparation of the report, subsurface investigations were conducted to identify any potentially detrimental soil chemicals, as well as areas with potentially expansive or collapsible soils, in compliance with American Society for Testing and Materials standards for field and laboratory testing. Site-specific design measures were also enumerated, based upon the field and laboratory results identified in the report. Because the requirements of MM GEO-2 have already been satisfied by the Interim Geotechnical Investigation that was submitted with the PEA, this measure should be omitted.	GEO-2 Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design. The design level geotechnical studies to be performed by the applicant shall identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates. Appropriate design measures shall be utilized for protection of reinforcement, concrete, and metal structural components against corrosion, including use of corrosion-resistant materials and coatings, increased thickness of project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems. The geotechnical studies shall also identify areas with potentially expansive or collapsible soils and include appropriate design features, including excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill, ground treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Studies shall conform to industry standards of care and American Society for Testing and Materials (ASTM) standards for field and laboratory testing. Design shall conform to applicable sections of the County of San Diego grading codes, CBC, and the standard specifications for public works construction.	Not Applicable. The entire measure should be omitted.
38.	D.13 Geology, Mineral Resources, and Soils	D.13 -65	MM GEO-3	A Geotechnical Report was previously prepared for the ECO Substation Project and was submitted as Attachment 4.6-A: Interim Geotechnical Investigation with the PEA. The potential for ground-shifting hazards was identified, and appropriate California Building Code- and Institute of Electrical and Electronic Engineers-compliant engineering and construction measures were described in the report. Because the requirements of MM GEO-3 have already been satisfied by the Interim Geotechnical Investigation that was submitted with the PEA, this measure should be omitted.	GEO-3: Conduct geotechnical investigations. 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 measures that meet CBC and 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. The geotechnical investigations prepared by a certified geologist shall be submitted to CPUC and BLM 60 days prior to construction of proposed structures.	Not Applicable. The entire measure should be omitted.

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39.	D.13 Geology, Mineral Resources, and Soils	D.13 -65	MM GEO-4	The terms “large levels” of ground shaking and “major” earthquake should be defined. SDG&E standard procedures already address this issue, so this measure should be revised to reflect SDG&E’s current procedures.	GEO-4. Facilities inspections conducted following major seismic event. If large levels of ground shaking are experienced or a major earthquake occurs along the Elsinore Fault, an SDG&E engineer or a professional licensed geologist, geotechnical engineer, or and structural engineer hired by SDG&E 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.	GEO-4. Facilities inspections conducted following major seismic event. If large levels of ground shaking are experienced or a major earthquake occurs along the Elsinore Fault, an SDG&E engineer or a professional licensed geologist, geotechnical engineer, or structural engineer hired by SDG&E 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.
D.15 – Fires and Fuels						
40.	D.15 Fires and Fuels	D.15 -92 & 93	MM FF-1	MM FF-1 requires approval of a Construction Fire Prevention/Protection Plan from CAL FIRE; however, CAL FIRE does not approve these plans. CAL FIRE reviews plans in consultation with appropriate fire agencies. The measure has been revised to reflect the appropriate agency reviewers. Additionally, SDG&E recommends that the text in the last bullet be clarified to read “within 100 feet of a vehicle and/or the tools be removed from vehicle and staged within 100 feet.”	FF-1. Develop and implement a Construction Fire Prevention/Protection Plan. San Diego Gas and Electric Company (SDG&E) shall develop a multiagency Construction Fire Prevention/Protection Plan for the East County (ECO) Substation Project and monitor construction activities to ensure implementation and effectiveness of the plan. The Plan reviewers shall be reviewed by include the California Public Utilities Commission (CPUC), California Department of Forestry and Fire Protection (CAL FIRE), Rural Fire Protection District, and San Diego County Fire Authority (SDCFA). SDG&E shall provide a draft copy of this plan to the reviewing agencies each listed agency at least 90 days before the start of any construction activities. Comments on the plan shall be provided by each listed agency to SDG&E to all other participants , and SDG&E shall resolve each comment in consultation with CAL FIRE, Rural Fire Protection District, and SDCFA . The final plan will be implemented approved by commenting agencies and provided to SDG&E for implementation during all construction activities. At minimum, the plan will include the following: <ul style="list-style-type: none"> • Procedures for minimizing potential ignition <ul style="list-style-type: none"> ○ vegetation clearing ○ fuel modification establishment ○ parking requirements ○ smoking restrictions ○ hot work restrictions • Red Flag Warning restrictions • Fire coordinator role and responsibility • Fire suppression equipment on site at all times work is occurring • Requirements of Title 14 of the California Code of Regulations (CCR), Article 8 #918 “Fire Protection” for private land portions 	FF-1. Develop and implement a Construction Fire Prevention/Protection Plan. San Diego Gas and Electric Company (SDG&E) shall develop a multiagency Construction Fire Prevention/Protection Plan for the East County (ECO) Substation Project and monitor construction activities to ensure implementation and effectiveness of the plan. The Plan shall be reviewed by the California Public Utilities Commission (CPUC), California Department of Forestry and Fire Protection (CAL FIRE), Rural Fire Protection District, and San Diego County Fire Authority (SDCFA). SDG&E shall provide a draft copy of this plan to the reviewing agencies at least 90 days before the start of any construction activities. Comments on the plan shall be provided by SDG&E, and SDG&E shall resolve each comment. The final plan will be implemented during all construction activities. At minimum, the plan will include the following: <ul style="list-style-type: none"> • Procedures for minimizing potential ignition <ul style="list-style-type: none"> ○ vegetation clearing ○ fuel modification establishment ○ parking requirements ○ smoking restrictions ○ hot work restrictions • Red Flag Warning restrictions • Fire coordinator role and responsibility • Fire suppression equipment on site at all times work is occurring • Requirements of Title 14 of the California Code of Regulations (CCR), Article 8 #918 “Fire Protection” for private land portions • Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009)

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
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					<ul style="list-style-type: none"> • Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009) • Emergency response and reporting procedures • Emergency contact information • Worker education materials; kick-off and tailgate meeting schedules • Other information as provided by CAL FIRE, Rural Fire Protection District, SDCFA, and • Bureau of Land Management (BLM). <p>Additional restrictions will include the following:</p> <ul style="list-style-type: none"> • During the construction phase of the project, SDG&E shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. • Fire Suppression Resource Inventory – In addition to CCR Title 14, 918.1(a), (b), and (c), SDG&E shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on quarterly basis and provide it to the CAL FIRE Rural Fire Protection District, and SDCFA. • During Red Flag Warning events, as issued daily by the National Weather Service in state responsibility areas (SRAs) and local responsibility areas (LRA), and when the U.S. Forest Service (USFS) Project Activity Level (PAL) is Very High on Cleveland National Forest (CNF) (as appropriate), all construction and maintenance activities shall cease. Exception for transmission line testing: A transmission line may be tested, one time only, if the loss of another transmission facility could lead to system instability or cascading outages. • Utility and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF • All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow for immediate reporting of fires. Communication pathways and equipment shall be 	<ul style="list-style-type: none"> • Emergency response and reporting procedures • Emergency contact information • Worker education materials; kick-off and tailgate meeting schedules • Other information as provided by CAL FIRE, Rural Fire Protection District, SDCFA, and • Bureau of Land Management (BLM). <p>Additional restrictions will include the following:</p> <ul style="list-style-type: none"> • During the construction phase of the project, SDG&E shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. • Fire Suppression Resource Inventory – In addition to CCR Title 14, 918.1(a), (b), and (c), SDG&E shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on quarterly basis and provide it to the CAL FIRE Rural Fire Protection District, and SDCFA. • During Red Flag Warning events, as issued daily by the National Weather Service in state responsibility areas (SRAs) and local responsibility areas (LRA), and when the U.S. Forest Service (USFS) Project Activity Level (PAL) is Very High on Cleveland National Forest (CNF) (as appropriate), all construction and maintenance activities shall cease. Exception for transmission line testing: A transmission line may be tested, one time only, if the loss of another transmission facility could lead to system instability or cascading outages. • Utility and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF. • All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with

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					<p>tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition.</p> <ul style="list-style-type: none"> 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 crewmembers as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect. Each member of the construction crew shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. Each crew member shall at all times be within 100 feetyards of a vehicle and/or the tools eontaining equipment necessary for fire suppression be removed from the vehicle and staged within 100 feet as outlined in the final Construction Fire Prevention/Protection Plan. <p>SDG&E shall fully implement the plan during all construction and maintenance activities. All construction work on the ECO Substation shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments, and plan contents are to be incorporated into the standard construction contracting agreements for the construction of the ECO Substation. Primary plan enforcement implementation responsibility shall remain with SDG&E and monitored by CAL FIRE, Rural Fire Protection District, and SDCFA.</p>	<p>jurisdiction in the project area immediately upon ignition.</p> <ul style="list-style-type: none"> 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 crewmembers as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect. Each member of the construction crew shall be trained and equipped to extinguish small fires 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 and/or the tools necessary for fire suppression be removed from the vehicle and staged within 100 feet as outlined in the final Construction Fire Prevention/Protection Plan. <p>SDG&E shall fully implement the plan during all construction and maintenance activities. All construction work on the ECO Substation shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments, and plan contents are to be incorporated into the standard construction contracting agreements for the construction of the ECO Substation. Primary plan enforcement implementation responsibility shall remain with SDG&E and monitored by CAL FIRE, Rural Fire Protection District, and SDCFA.</p>

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41.	D.15 Fires and Fuels	D.15 -94	MM FF-2	SDG&E implements a robust Fire Safety & Prevention Program for all of its operations and maintenance work. The measure should be revised to reflect SDG&E's existing practices.	<p>FF-2. <u>Implement Fire Safety & Prevention Program. SDG&E shall implement the following as part of their existing Fire Safety & Prevention Program:</u></p> <ul style="list-style-type: none"> • <u>Electric Standard Practice 113.1, which is a comprehensive set of directions for SDG&E employees and contractors to implement when performing work in the wildland areas of the service territory with regard to fire safety and fire prevention. It meets, as a minimum, all of the requirements of the California Forest Standard Practice Act and generally exceeds it in most cases. It outlines fire tools and equipment to be made available on all work in the wildland areas and the associated training required for compliance.</u> • <u>Maintenance of their elaborate weather data system throughout the service territory including Remote Area Weather Stations and wind anemometers. This is considered the most comprehensive weather collection system in the country. It allows for monitoring weather and restricting potential fire risks as appropriate throughout the service territory.</u> • <u>Adjusted system reclosing policies to significantly reduce risk during elevated fire conditions. System faults are now patrolled and not remotely tested during these periods of time. It has identified particularly high risk areas and put procedures in place to shut-off individual circuits if wind speeds exceed design criteria of the electric system.</u> • <u>Replacement of wood poles with steel poles in the highest risk areas of the service territory and are closing in on completion for our transmission system and initiating the same process on the distribution system. This hardening of the system makes it more robust and less susceptible to fire ignition.</u> • <u>Modification of many other practices, such as reducing span length where possible, longer arm length to increase horizontal spacing of conductors, adding more sensitive system interrupters or “pulse closers,” and continues to seek other system modifications that can reduce fire risk.</u> 	<p>FF-2. Implement Fire Safety & Prevention Program. SDG&E shall implement the following as part of their existing Fire Safety & Prevention Program:</p> <ul style="list-style-type: none"> • Electric Standard Practice 113.1, which is a comprehensive set of directions for SDG&E employees and contractors to implement when performing work in the wildland areas of the service territory with regard to fire safety and fire prevention. It meets, as a minimum, all of the requirements of the California Forest Standard Practice Act and generally exceeds it in most cases. It outlines fire tools and equipment to be made available on all work in the wildland areas and the associated training required for compliance. • Maintenance of their elaborate weather data system throughout the service territory including Remote Area Weather Stations and wind anemometers. This is considered the most comprehensive weather collection system in the country. It allows for monitoring weather and restricting potential fire risks as appropriate throughout the service territory. • Adjusted system reclosing policies to significantly reduce risk during elevated fire conditions. System faults are now patrolled and not remotely tested during these periods of time. It has identified particularly high risk areas and put procedures in place to shut-off individual circuits if wind speeds exceed design criteria of the electric system. • Replacement of wood poles with steel poles in the highest risk areas of the service territory and are closing in on completion for our transmission system and initiating the same process on the distribution system. This hardening of the system makes it more robust and less susceptible to fire ignition. • Modification of many other practices, such as reducing span length where possible, longer arm length to increase horizontal spacing of conductors, adding more sensitive system interrupters or “pulse closers,” and continues to seek other system modifications that can reduce fire risk.

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					<ul style="list-style-type: none"> • Active membership and participation in the Greater San Diego Fire Safe Council, Border Agency Fire Council, Forest Area Safety Taskforce, and the San Diego County Fire Chiefs Association with each of these groups primary goal being promoting fire safety and prevention in our county. Revise the Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009) to Create the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan The plan will address the Proposed PROJECT and will be implemented during all operation and maintenance work associated with the project for the life of the project. Important fire safety concepts that are included in this document and make it an important overall mitigation measure are the following: <ul style="list-style-type: none"> • 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) • Fuel modification buffers required by the Fire Protection Plans (FPP) • When vegetation work will occur (prior to any other work activity) • Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread • Coordination procedures with fire authority • Integration of the project's Construction Fire Prevention/Protection Plan content • Personnel training and fire suppression equipment • Red Flag Warning restrictions for operation and maintenance work • Fire safety coordinator role as manager of fire prevention and protection • procedures, coordinator with fire authority and educator • Communication protocols • Incorporation of responsible fire agencies reviewed and approved Response Plan mapping and assessment. • Other information as provided by CAL FIRE, San Diego Rural Fire Protection District, San Diego County Fire Authority (SDCFA), BLM, and U.S. Forest • Service (USFS), as applicable. 	<ul style="list-style-type: none"> • Active membership and participation in the Greater San Diego Fire Safe Council, Border Agency Fire Council, Forest Area Safety Taskforce, and the San Diego County Fire Chiefs Association with each of these groups primary goal being promoting fire safety and prevention in our county.

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
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					<p>The project applicant will provide a draft copy of the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and agencies with input from permitting agencies, as desired, and provided to the project applicant for implementation during all construction activities. Maintenance Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to the applicant and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be approved by the responsible fire agencies with input from permitting agencies, as desired, and provided to the project applicant for implementation during all construction activities.</p>	
42.	D.15 Fires and Fuels	D.15 -95	MM FF-3	<p>Impact discussion within the Draft EIR/EIS does not justify the proposed mitigation. It is SDG&E's position that the presence of the 138 kV transmission line would not significantly and unavoidably constrain aerial or ground firefighting or propose a significant risk for the probability of a wildfire during construction or maintenance. High-voltage transmission lines are not a significant risk of ignition for wildfires. The conclusion that the presence of the transmission line would reduce the effectiveness of firefighting to the level of a Class I impact is incorrect and excessive. If funding is required as mitigation, the mitigation should be proportionate to the impact caused by the construction of less than 10 miles of overhead transmission line parallel to an existing 500 kV transmission line. Additionally, SDG&E would prefer to enable the agencies to use judgment as to how the funds would be used most effectively.</p>	<p>FF-3. Development Agreement with Rural Fire Protection District and San Diego County Fire Authority. Provide funding for the training and acquisition of necessary firefighting equipment and services to Rural Fire Protection District and SDCFA to improve the response and firefighting effectiveness near electrical substations, transmission lines, and aerial infrastructure. Although not implementable on BLM or other federal land, the local fire authority will respond through mutual aid to wildfires within its jurisdiction, regardless of land ownership designation. Funding would be provided through a Development Agreement with Rural Fire Protection District and SDCFA. The Development Agreement would include, but not be limited to, the following items as agreed upon by Rural Fire Protection District, SDCFA, and SDG&E:</p> <ul style="list-style-type: none"> • Funding toward purchase of a Type I (or other) fire engine equipped for potential project-related fires (i.e., foam capability) • Funding as required by standard fire district fee schedule • Foam concentrate supply of 450 gallons, foam education equipment, and nozzles on mobile trailer. 	<p>Not Applicable. The entire measure should be omitted.</p>
43.	D.15 Fires and Fuels	D.15 -95	MM FF-4	<p>MM FF-4 should be revised to reflect the changes to MM FF-1 and MM FF-2; therefore, the last bullet of this measure should be omitted.</p>	<p>FF-4. Customized Fire Protection Plan for Project. A Fire Protection Plan completed and submitted with Draft EIR/EIS and to include, at minimum, the following:</p> <ul style="list-style-type: none"> • San Diego County FPP Content Requirements (http://www.co.sandiego.ca.us/dplu/docs/Fire-Report-Format.pdf) • Rural Fire Protection District Content Requirements • Provisions for fire safety and prevention • Water supply • Fire suppression/detection systems – built-in detection 	<p>FF-4. Customized Fire Protection Plan for Project. A Fire Protection Plan completed and submitted with Draft EIR/EIS and to include, at minimum, the following:</p> <ul style="list-style-type: none"> • San Diego County FPP Content Requirements (http://www.co.sandiego.ca.us/dplu/docs/Fire-Report-Format.pdf) • Rural Fire Protection District Content Requirements • Provisions for fire safety and prevention • Water supply • Fire suppression/detection systems – built-in detection

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					system with notification <ul style="list-style-type: none"> • Secondary containment • Site security and access • Emergency shut-down provisions • Fuel modification plan • Access road widths and surfacing • Emergency drill participation • Emergency evacuation plan- • Integration into Plans prepared to satisfy FF-1 and FF-2 The FPP will incorporate additional APMs described in Section B.3.4 of this EIR/EIS.	system with notification <ul style="list-style-type: none"> • Secondary containment • Site security and access • Emergency shut-down provisions • Fuel modification plan • Access road widths and surfacing • Emergency drill participation • Emergency evacuation plan The FPP will incorporate additional APMs described in Section B.3.4 of this EIR/EIS.
44.	D.15 Fires and Fuels	D.15 -96	MM FF-6	The overhead portion of the 138 kV transmission line is immediately adjacent to the right-of-way of an existing 500 kV transmission line (Southwest Powerlink); therefore, it is SDG&E's position that the presence of the 138 kV transmission line would not significantly and unavoidably constrain aerial or ground firefighting. The conclusion that the presence of the transmission line would reduce the effectiveness of firefighting to the level of a Class I impact is incorrect and excessive. Thus, this measure should be omitted.	FF-6. FF-6: Funding for FireSafe Council. Provide funding for locally based FireSafe Council (e.g., Campo/Lake Moreno FireSafe Council) to prepare or implement a Community Wildfire Protection Plan. The funding will be determined in conjunction with the local fire authority's input, the specified fuel reduction project priorities identified by the FireSafe Council, and in consideration of the funding amount provided under Mitigation Measure FF-3.	Not Applicable. The entire measure should be omitted.
45.	D.15 Fires and Fuels	D.15 -96	MM FF-7	MM FF-7 is the same requirement as MM BIO-1d. This measure should be omitted to avoid confusion during the construction phase and ensure an effective mitigation monitoring, compliance, and reporting program.	FF-7. Preparation of Disturbed Area Revegetation Plan. SDG&E shall prepare a Revegetaion Plan in accordance with MM BIO-1d. All areas disturbed during construction activities that will not be continuously included in the long-term maintenance access right-of-way (ROW) will be provided native plant restoration in order to prevent nonnative, weedy plants from establishing. Disturbed areas that will be included in the long-term maintenance program will not be revegetated as any plants that establish in these areas will be removed on an ongoing (at least annual) basis. Mitigation Measure FF-7 directs that the temporary disturbance areas will be revegetated with native plants common to the area through direction detailed in a Habitat Restoration Plan. The Habitat Restoration Plan will be prepared to restore native habitat and to reduce the potential for non-native plant establishment. The restoration plan will incorporate a Noxious Weeds and Invasive Species Control Plan to assist in restoring the construction area to the prior vegetated state and lessen the possibility of establishment of non-native, flammable plant species. A copy of the Revegetation Plan will be provided to the BLM and BLM.	Not Applicable. The entire measure should be omitted.

Comment #	Section Name	Page #	Mitigation Measure	General Comment	Mitigation Measure	
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D.16 – Social and Economic Conditions						
No Comments						
D.17 – Environmental Justice						
No Comments						
D.18 – Climate Change						
No Comments						

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ES – Executive Summary					
1.	ES.2.3	ES-3 & 4	5 & 1	Responsible/cooperating agencies, including the County of San Diego, California State Lands Commission, Bureau of Indian Affairs (BIA), Ewiiapaayp Band of Kumeyaay Indians, and the U.S. Army Corps of Engineers (ACOE), will also use the EIR/EIS for their approval processes.	In Section ES.2.3, it is stated that the United States (U.S.) Army Corps of Engineers (ACOE) will use the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for their approval process under Section 404 of the Clean Water Act. The EIR/EIS should be clarified to acknowledge that limited impacts to ACOE-jurisdictional waters from the East County (ECO) Substation Project (Project) are not expected to require an Individual Permit and would instead be authorized under the ACOE Nationwide Permit program. Nationwide Permits have already undergone National Environmental Policy Act (NEPA) review. The EIR/EIS should be clarified that each project considered in the document is subject to separate approvals from state and federal agencies.
2.	ES.2.3	ES-4	Table ES-1, ECO		California Public Utilities Commission (CPUC) jurisdiction for the Southwest Powerlink (SWPL) loop-in should be for 1.6 acres, rather than 1.74 acres. This was incorrect because the number represents the original acreage of pull sites, which is a temporary, not permanent impact.
3.	ES.6.1	ES-19	4-6	As summarized in Table ES-3, the ECO Substation Alternative Site, combined with the ECO Partial Underground 138 kV Transmission Route Alternative, would cause the least environmental impact. Similar to the proposed ECO Substation Project and other project alternatives considered, this alternative would have adverse and unmitigable (Class I) impacts in the following issue areas: biological resources, visual resources, cultural resources, short-term construction noise, air emissions, and fire and fuels management. Impacts in the remaining 11 issue areas would either be not adverse and under CEQA would be considered less than significant (Class III) and/or following implementation of mitigation measures presented in this EIR/EIS, would be mitigable and under CEQA considered less than significant with mitigation implemented (Class II).	This identifies that the ECO Substation Alternative Site and the ECO Partial Underground 138 kilovolt (kV) Transmission Line Route Alternative would cause the least amount of environmental impacts. However, the analysis within the EIR/EIS states that Class I impacts would still remain for biological resources, visual resources, cultural resources, short-term construction noise, air emissions, and fire and fuels management, to the same degree as for the Project. In addition, the EIR/EIS states that, “this alternative would increase short-term construction-related impacts to air, noise, water, erosion, and biological resources.” The fact that the ECO Partial Underground 138 kV Transmission Line Route Alternative would not decrease overall impacts to visual resources and fire and fuel management from Class I to Class II and would increase short-term impacts to numerous resource areas does not justify the conclusion that this alternative would cause the least amount of environmental impacts. In addition, the significant cost associated with installing the 138 kV transmission line underground would be passed along to the rate payers without a quantitative measure of the reduction in impacts.
4.	ES.7.1	ES-24	2	CEQA requires that the environmentally superior alternative be selected from a range of reasonable alternatives that could feasibly attain the basic objectives of the project. Based on the analysis presented in Sections D.2 through D.18 of this EIR/EIS, the environmentally superior alternative was determined to be the No Project Alternative 1, No ECO Substation, Tule Wind, ESJ Gen-Tie, Campo, Manzanita, or Jordan wind energy projects. Under the No Project Alternative 1, the Proposed PROJECT (including the ECO Substation, Tule Wind, ESJ Gen-Tie, Campo, Manzanita, and Jordan wind energy projects) would not be constructed.	It is stated in this section that “[the California Environmental Quality Act (CEQA)] requires that the environmentally superior alternative be selected from a range of reasonable alternatives that could feasibly attain the basic objectives of the project.” It is then stated that the environmentally superior alternative was determined to be the No Project Alternative. However, this alternative would not attain any of the Project objectives. This conclusion should be revised for the reasons outlined by San Diego Gas & Electric Company (SDG&E) in the main body of its comment letter.
A – Introduction/Overview					
5.	A.1	A-1	3	The CPUC and BLM have evaluated these projects to determine whether they are so closely related to the proposed ECO substation Project as to be considered “connected actions” under the National Environmental Policy Act (NEPA)...[identifying Tule Wind Project and EST Gen-Tie Project as “connected actions.”]	SDG&E does not believe that the ECO Substation Project is a “connected action” to either the Energia Sierra Juarez Generation-Tie (ESJ) Project or the Tule Wind (Tule) Project. As a California public utility, SDG&E is required to provide reliable electric service to all of its customers. Consistent with this obligation, a primary objective of the ECO Substation Project is to improve service reliability for the communities of Bankhead Springs, Boulevard, Jacumba and Manzanita, as well as the Campo, La Posta, and Manzanita Indian Reservations, which experience periodic outages due to a long radial 69 kV transmission system. SDG&E initially conceived the ECO Substation Project in 2006, and would build

Attachment C – Technical Corrections and Clarifications
 East County Substation Project Draft EIR-EIS



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					the ECO Substation Project irrespective of whether the Tule Project or the ESJ Project are ultimately approved or built. Given interest by renewable developers in the area, the ECO Substation Project would create an interconnection hub into which renewable generation can connect at three voltage levels—138 kV, 230 kV, and 500 kV—which eliminates the potential or need for construction of a series of developer-owned switching stations and other facilities along SWPL, that would otherwise need to be constructed. Where, as here, the projects have independent utility, they are not “connected actions” under NEPA, even if the presence of each would facilitate each other. <i>See Sylvester v. U.S. Army Corps of Eng’rs</i> , 884 F.2d 394, 400 (9th Cir. 1989) (finding that golf course was not connected to the development of a nearby ski resort by the same developer, since “each could exist without the other, although each would benefit from the other’s presence”); <i>Morongo Band of Mission Indians v. Fed. Aviation Admin.</i> , 161 F.3d 569, 580 (9th Cir. 1998) (proposed flight path project to decrease congestion at LAX was not connected to larger LAX expansion project; even though flight path project would help the increased congestion expected from a bigger airport, both projects could occur independently); 40 C.F.R. § 1508.25(a)(1). As recognized by the Draft EIR/EIS, “the ECO Substation Project could be constructed regardless of the Tule Wind Project and will be subject to a distinct action.” D.11-18. The EIR/EIS should be revised to recognize that these projects are not “connected actions” in a legal sense
6.	A.4.2.2	A-17	Table A-2		A grading permit is considered a discretionary permit per San Diego County (County) regulations, as stipulated in the letter provided by the CPUC to the County dated December 4, 2009, with regard to the Sunrise Powerlink Project. Discretionary permits are preempted by the CPUC. Thus, a grading permit should not be included in Table A-2.
7.	A.5.3	A-15	Table A-1		CPUC jurisdiction for the SWPL loop-in should be for 1.6 acres, rather than 1.74 acres. This was incorrect because the number represents the original acreage of pull sites, which is a temporary, not permanent impact.
8.	A.5.4	A-16	Table A-2, ECO, Federal		Row 3 under the Federal Permit Regulatory Requirement column states that Section 7 Consultation is required for the ECO Substation Project regarding golden eagles. Golden eagles are not listed under the Endangered Species Act (ESA) and no Section 7 consultation is required for that species. ESA Section 7 Consultation is required for the Quino checkerspot butterfly (QCB) for the ECO Substation Project. SDG&E would conduct pre-construction nesting bird surveys, but Section 7 consultation is not required. Golden eagles are protected by the federal Bald and Golden Eagle Protection Act.
9.	A.5.4	A-16	Table A-2, ECO, State		Row 1 under the State Permit Regulatory Requirement column states that a Certificate of Public Convenience and Necessity (CPCN) is required for the ECO Substation Project. However, a Permit to Construct is required (not a CPCN), and the text should be revised to reflect this.
10.	A.5.4	A-17	Table A-2, ECO, State		Row 3 under the State Permit Regulatory Requirement column states that a Section 2061(sic) Incidental Take Permit is required for the ECO Substation Project. However, there would be no take of state-listed threatened or endangered species associated with the substation and transmission line upgrades; thus, no 2081 or 2080.1 permit would be required.

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
11.	A.5.4	A-17	Table A-2, ECO, State		Row 7 under the State Permit Regulatory Requirements column states that both a Stormwater Construction General Permit 99-08-DWQ and a National Pollutant Discharge Elimination System State Permit are required for the ECO Substation Project. However, these are the same and should be included as only one requirement. Additionally, 99-08-DWQ was superseded by 2009-0009-DWQ, which took effect on September 2, 2009. The permit number should be revised to reflect the current permit.
12.	A.5.4	A-17	Table A-2, ECO, State		Row 7 under the State Permit Regulatory Requirements column states that a Waste Discharge Requirements is necessary for the ECO Substation Project. However, this is not required as all drainage impacts to waters of the State would be authorized under a Clean Water Act Section 401 Certification.
B – Project Description					
13.	B.2	B-1	Table B-1		<p>The amount of approximate permanent impacts (acres) varies from that listed in Table ES-1 and Table A-1 and should be made consistent. Temporary impacts resulting from the 13.3-mile transmission line would total approximately 4.95 acres, as opposed to 22.54 acres. Also, permanent impacts resulting from the 13.3-mile transmission line would total approximately 33.27 acres, rather than 11.06 acres after the addition of permanent maintenance pads around poles.</p> <p>Also, the permanent impacts for the SWPL loop-in totals 1.6 acres, resulting from the six permanent maintenance pads, rather than 1.74 acres as stated in the table. The 1.74 acres was the original amount of space needed for pull sites, which is a temporary, rather than permanent impact.</p>
14.	B.3.1.3	B-25	Figure B-6		Figure B-6 should be updated with figures included as Attachment A: Structure Typical Drawings with the Revised East County Substation Footprint Project Description submitted to the CPUC on April 30, 2010.
15.	B.3.2.2	B-55	2	Site preparation would also include construction of drainage components, including above-grade concrete drainage swales, underground drains, and concrete catch basins to capture and direct stormwater flow across the site to one of two retention basins. A drainage plan identifying the location and size of all drainage components would be developed by SDG&E. The drainage plan would be implemented to minimize surface water and erosion impacts.	A preliminary hydrology analysis, which was based upon the Project as identified in the Proponent’s Environmental Assessment (PEA), was submitted to the CPUC as an attachment with Data Request Response 10 on July 19, 2010. SDG&E would submit a drainage plan (as part of the grading drawings) and all corresponding drainage calculations. The drainage plan along with the drainage calculations would show the size and location of drainage facilities and protect surface waters by directing potentially contaminated or sediment-laden water that crosses the ECO Substation into the retention basin. Any remaining potential impacts to surface waters and erosion would be addressed in the Storm Water Pollution Prevention Plan.
16.	B.3.2.2	B-64	4	Lastly, the existing 69 kV transmission line (TL 6931) would be rerouted into the rebuilt Boulevard Substation. Rerouting would require the installation of two direct embedded steel poles, approximately 85 feet in height, and associated guying. These poles would be located west of the substation rebuild site.	Two existing 12 kV distribution lines entering and exiting the existing Boulevard Substation would be relocated onto a new steel riser pole, then extended through an underground duct bank to connect to the rebuilt substation. The rerouting of the 12 kV distribution lines is fully described and depicted in Attachment A: Updated Project Description and ECO Substation Alternative Site.
17.	B.3.3	B-75	5	A minimum working space of 150 feet in diameter around all transmission structures would be maintained by SDG&E. This area would be kept clear of shrubs and other obstructions for inspection and maintenance purposes. In addition, vegetation that has a mature height of 15 feet or taller would not be allowed to grow within 10 horizontal feet of any conductor within the ROW, for safety and reliability reasons.	The paragraph states that a minimum working space of 150 in diameter around all transmission structures would be maintained by SDG&E. The EIR/EIS should be clarified to acknowledge that the maintenance pads are not circular. Instead, they typically measure approximately 100 feet by 150 feet.

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
18.	B.3	B-76	6	Certain poles or structures would require the removal of vegetation to increase aerial patrol effectiveness or to reduce fire danger. Vegetation would be removed using mechanical equipment, such as chainsaws, weed trimmers, rakes, shovels, and brush hooks. A crew of three workers would typically conduct this work. As stated previously, SDG&E would maintain a 150-foot-diameter area around each transmission structure. The total area needed to complete this task is approximately 100 feet by 100 feet and it takes approximately 2 hours to complete. Poles are typically inspected on an annual basis to determine if vegetation removal around poles is required.	The addition of permanent maintenance pads around 138 kV transmission line poles needs to be added to the Project Description, as provided in the document Revised East County Substation Footprint Project Description, which was submitted to the CPUC on April 30, 2010. Additionally, pole brushing would not be required except for within agricultural fields where permanent maintenance pads would not be constructed.
C - Alternatives					
19.	C.4.1	C-29	Table C-2		Numbers pertaining to the ECO Substation Project for the 138 kV transmission line components should be revised. Temporary impacts for the 138 kV transmission line should be approximately 4.95 acres and permanent impacts should be approximately 33.27 acres. Numbers pertaining to the ECO Substation Alternative Site should be revised to 18.35 acres of temporary impact totals and 83.56 acres of permanent impact totals for the ECO Substation component. Approximately 4.36 acres of temporary impacts and 35.05 acres of permanent impacts would result from the 138 kV transmission line.
20.	C.4.1.1	C-30	1	The two retention basins in the Proposed PROJECT joined to form one (2.41 acres).	The single retention basin has been further modified and would measure approximately 1.46 acre at its base; the basin has sloped sides and would measure approximately 3.95 acres from the edge of the pad to the top of the slopes. This sentence should also be revised to reflect that the basin is applicable to the ECO Substation Project, and not to the Proposed PROJECT, which also includes the Tule Project and the ESJ Project.
21.	C.4.1.1	C-31	Figure C-4		This figure should be revised to reflect Figure 1: Revised ECO Substation Footprint and Southern Access Road in Southern Access Road Description and Impact Summary (October 7, 2010), as also provided with Attachment A – Updated Project Description and ECO Substation Alternative Site.
22.	C.3	C-15	Table C-1	Expected to meet environmental criteria. Has potential to reduce long-term visual and land use impacts. Environmental issues include increased short-term construction impacts.	Under the Environmental Criteria column for the ECO Partial Underground 138 kV Transmission Route Alternative, the discussion should be revised to address the potential for impacts to biological, cultural, and hydrological resources from undergrounding. In order to assess these impacts, SDG&E prepared a feasible preliminary design of the underground section of the Partial Underground Alternative, which is described in Attachment A – Updated Project Description and ECO Substation Alternative Site, and depicted in Figure A-3: Preliminary Underground Alignment Drawing. The impacts resulting from the partial underground portion of the Project would not be substantial and would not therefore be significant.
23.	C.4.1.2	C-34	1	Where this alternative crosses surface water drainages, additional ROW and horizontal directional drilling would be implemented to avoid direct impacts to surface water.	It is stated that horizontal directional drilling (HDD) is required to avoid impacts to surface water. However, the EIR/EIS should be clarified to acknowledge that other methods, such as jack and bore and open cut, could also be used to avoid or minimize impacts to surface and jurisdictional waters, and should be available options. SDG&E believes that open cutting a dry wash or drainage would have fewer impacts than boring or HDD. Additionally, boring or HDD would not avoid all impacts to surface waters as indicated because work areas would be required and most likely could not avoid all jurisdictional drainages.

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24.	C.6.2	C-64	4	Under the No Project Alternative 2, the ECO Substation Project would not be built, and the conditions in the existing energy grid and local environment would remain. Without the ECO Substation Project, there would not be an interconnection hub that would enable renewable generation such as the ESJ Gen-Tie or Tule Wind projects to connect to the grid. Additionally, energy transmission would remain unreliable in the Boulevard, Jacumba, and surrounding communities. Planned generation facilities in the project area would require additional miles of transmission line to reach an interconnection point and possibly multiple connection points on SDG&E’s existing transmission system. In addition, new substations to be constructed by each generator might be required to connect the generation facilities to the grid.	SDG&E’s comments regarding the No Project Alternative are included in SDG&E’s detailed comment letter and incorporated herein by reference.
D.1 – Introduction to Environmental Analysis					
No comments					
D.2 – Biological Resources					
25.	D.2	D-134	2	<p>No potential jurisdictional features were identified on the Boulevard Substation project component area.</p> <p>The ECO Substation Project would result in a total of approximately 0.5 acre of impact through the direct fill to three potential jurisdictional desert swale features in the ECO Substation area.</p>	<p>Regarding line four of the first paragraph, there is an existing drainage feature located on the Boulevard Substation relocation site that would be permanently impacted in order to improve it to handle flows, resulting in a 0.03-acre impact.</p> <p>The sentence should be revised to reflect the updated impacts to ACOE-, Regional Water Quality Control Board (RWQCB)-, and California Department of Fish and Game (CDFG)-jurisdictional areas based upon modifications to the Project. The updated numbers are 0.55 temporary and 0.93 permanent impacts to ACOE/RWQCB-jurisdictional waters. Temporary impacts to CDFG-jurisdictional waters from the Project would measure approximately 1.44 acres and permanent impacts would equal approximately 2.81 acres. These impacts are also identified in Table 4: Jurisdictional Drainage Impacts in Acres in Attachment A – Updated Project Description and ECO Substation Alternative Site. Impacts resulting from the ECO Substation Alternative Site are also identified in Attachment A – Updated Project Description and ECO Substation Alternative Site.</p>
26.	D.2	D.2-30	1	Special-status species are those species that have been given special recognition by federal, state, or local conservation agencies and organizations due to limited, declining, or threatened population sizes. This includes those species listed by the state and federal government as threatened or endangered, those species proposed for state and/or federal listing or candidates for listing, species listed as sensitive by the BLM, those plant species found on Lists 1A, 1B, or 2 of the CNPS Inventory of Rare and Endangered Plants of California (2010) or CNPS online inventory (http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi), and other locally sensitive species.	<p>The EIR/EIS includes plant species listed as List 3 or List 4 by the California Native Plant Society (CNPS) as sensitive, thus requiring mitigation. However, only CEQA evaluation of CNPS List 1A, List 1B, and List 2 species is mandatory. While these species are included on the County’s Sensitive Plant List as List D, according to the County’s Guidelines for Determining Significance – Biological Resources, impacts to these species should only be considered if “the project would impact the local long-term survival of a County List C or D plant species.” Potential Project impacts to these List D species would be minimal, would not impact the local long-term survival of the species, and would not be significant; thus, mitigation should not be required. In addition, the EIR/EIS, Executive Summary, Page ES-19, states “The ECO Substation Project including Project alternatives was determined to be consistent with all applicable federal plans and policies. The County has no jurisdiction over the ECO Substation Project and, therefore, local policies, plans, and regulations do not apply.” Therefore, impacts to species listed on the County’s Sensitive Plant Lists should not be considered.</p> <p>The species in question include:</p> <ul style="list-style-type: none"> • Payson’s jewel-flower (<i>Caulanthus simulans</i>) – CNPS List 4.2 and SD County List D • Utah vine milkweed (<i>Cynanchum utahense</i>) – CNPS List 4.2 and SD County List D

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					<ul style="list-style-type: none"> Colorado Desert (oceanblue) larkspur (<i>Delphinium parishii</i> ssp. <i>subglobosum</i>) – CNPS List 4.3 and SD County List D Palmer’s grappling hook (<i>Harpagonella palmeri</i>) – CNPS List 4.2 and SD County List D Pride-of-California (<i>Lathyrus splendens</i>) – CNPS List 4.3 and SD County List D Jacumba monkeyflower (<i>Mimulus aridus</i>) – CNPS List 4.3 and SD County List D
27.	D.2	D.2-147	3	All observations of Quino checkerspot butterfly for the project area were within the designated critical habitat area; therefore, all of the critical habitat within the ECO Substation Project area is considered occupied.	The EIR/EIS should be clarified to state that occupied QCB habitat is defined as “a one-kilometer circle from QCB sightings” as was determined during Section 7 Consultation with the U.S. Fish and Wildlife Service. This is also consistent with the Sunrise Powerlink Project EIR/EIS.
D.3 – Visual Resources					
28.	D.3.3	D.3-73	1	The increased viewing distance to the substation (middle-ground distance zone, approximately 1.25 miles away) combined with the presence of other similar linear and industrial features, including I-8, Old Highway 80 and the SWPL 500 kV transmission line, would reduce the degree of contrast created by the substation to moderate levels (Figure D.3-23B for general location and angle of view toward substation site). However, given the change in visual character that the introduction of additional industrial elements would instigate, long-term visual contrasts resulting from the ECO Substation and SWPL Loop-In project components would be significant.	Reference in this paragraph is made to Figure D.3-23B, and it is later stated that long-term visual contrasts resulting from the ECO Substation and SWPL loop-in would be significant. However, as detailed in the PEA, the facilities are somewhat transparent and are not particularly noticeable because they blend into the desert landscape and Jacumba mountains in the backdrop. Furthermore, the proposed landscaping, at maturity, diminishes the visual contrast with the surrounding landscape. Therefore, SDG&E recommends that the EIR/EIS be revised to reflect that the long-term visual contrasts are not considered significant.
29.	D.3.3	D.3-73	2	SDG&E has proposed APM ECO-AES-1, which requires that, in accordance with the ECO Substation Landscaping Plan, all disturbed terrain at the ECO Substation site be restored through recontouring and revegetation. APM ECO-AES-1 is retained as a project-specific APM and is included in Table D.3-6, Mitigation Monitoring, Compliance, and Reporting–ECO Substation, Tule Wind, and ESJ Gen-Tie Projects–Visual Resources. Identified impacts would be adverse; therefore, APM ECO-AES-1 and Mitigation Measures VIS-3g and VIS-3h, have been provided. However, the identified impact cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	SDG&E believes that this should be considered a Class II, rather than a Class I impact, as these effects were accounted for in the Project design, and would be further reduced with the implementation of APM ECO-AES-1, MM VIS-3g, MM VIS-3h, and SDG&E’s ECO Substation Landscaping Plan. As described in the PEA, when viewed against the desert landscape backdrop, facility components will be visible, but not particularly noticeable. Explanations regarding proposed revisions to MM VIS-3g and MM VIS-3h are provided in Attachment B – Proposed Mitigation Measure Revisions.
30.	D.3.3	D.3-75	2	New access roads would also create strong color and line contrasts from soil and vegetation disturbances that would last the life of the project.	SDG&E does not agree with this statement in the EIR/EIS because the Project was designed to use existing access roads to the extent possible. In fact, all access roads to pole sites for the transmission line would be spur roads off of existing dirt roads except for the four new dirt access roads to be constructed to steel poles 106, 107, and 108, which would be located adjacent to the ECO Substation. Thus, new roads are not expected to create strong color and line contrasts.
D.4 – Land Use					
No comments					
D.5 – Wilderness and Recreation					
No comments					
D.6 – Agriculture					
No comments					
D.7 – Cultural and Paleontological Resources					
31.	D.7	D.7-16 - 18	Tables D.7-3 & D.7-4		Information in the EIR/EIS should be clarified regarding which cultural resources are within the area of potential effect (APE) and require National Register of Historic Places (NRHP) evaluation, and which are not. The information in the EIR/EIS is in conflict with the Cultural Resources Study prepared by e ² M, August 2010 (e ² m Report). Several sites included in Tables D-7.3 and D.7.4 of the EIR/EIS would not be impacted by the Project

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
					<p>and, thus, the EIR/EIS overstates impacts to cultural resources. The following sites should be removed from the discussion in the EIR/EIS regarding testing for NRHP eligibility and mitigation requirements:</p> <ul style="list-style-type: none"> Two previously recorded historic sites, SDI-7011 and SDI-9278H, and one previously recorded prehistoric site, SDI-7063, are identified in Table D.7-3 in the EIR/EIS as needing evaluation; however these sites are outside the APE and would not be affected by the Project: (Refer to e2M Report Table 3-5, for reference to SDI-7011H and SDI-9278H and Table 6-2, for reference to SDI-9278H. Additionally, a field check conducted by Dr. Susan Hector confirmed SDI-9278H is outside the APE). Five newly recorded prehistoric sites along the transmission line are identified in Table D.7-4 in the EIR/EIS as requiring evaluation: SDI-19066, SDI-19067, SDI-19068, SDI-19069, and SDI-19070. However, according to Table 6-2 in the e2M Report, these sites are outside the Project APE. <p>SDG&E concurs with the preliminary recommendation in the e²M Report that concludes that adherence to avoidance measures (construction monitoring, fencing and flagging) would not result in adverse effects to archeological sites eligible for inclusion in the NRHP. Based on the e²M Report, resources identified in the e²M Report do not appear to meet either NRHP or California Register eligibility criteria, or those portions of the site within the Project APE do not contribute to NRHP or California Register eligibility. SDG&E proposes to evaluate all of the cultural resources identified in the e²M Report for NRHP eligibility to confirm this preliminary conclusion. Should any of the resources meet the eligibility criteria, the historic property would be either avoided by Project redesign, where possible, or Project impacts would be minimized or mitigated.</p>
32.	D.7	D.7-53	1	<p>The proposed ECO Substation Project would have the potential to cause an adverse effect (substantial adverse change) to the characteristics of a TCP as defined by federal guidelines. The scope, nature, and extent of any TCPs associated with the APE are not presently known. Therefore, potential NRHP eligibility of unknown TCPs must be assumed. Identified impacts would be adverse; therefore, mitigation has been provided that would mitigate this impact. Under CEQA, impacts to TCPs would be significant but can be mitigated to a level that is considered less than significant through implementation of Mitigation Measures CUL-1A, CUL-1B, CUL-1C CUL-1D and CUL-1E, CUL-2, and CUL-3, which provides clarification and supersedes APMs ECO-CUL-1, ECO-CUL-3, and ECO-CUL-4 (Class II). In some cases, avoiding direct and indirect impacts to TCPs such as traditional landscapes, topographic elements including sacred mountains, or use areas may not be completely feasible given the geographic expanse of some of these resources. In this event, the residual impact on TCPs would be adverse; therefore, mitigation has been provided. However, the residual impact on TCPs cannot be mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).</p>	<p>The EIR/EIS discussion of cultural resources states that traditional cultural properties (TCPs) might exist within the ECO Substation Project area, and without any evidence for those locations, assumes that there would be adverse effects on unidentified, unknown resources (page D.7-53), classifying this as Class I. Whether TCPs are present (as defined in the National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties, revised 1998) is an ongoing process of identification through consultation. TCPs must be evaluated with reference to the National Register criteria; a TCP may be eligible under any one or more of the four criteria. In addition, the proposed TCP must be a tangible property with defined boundaries, it must retain integrity, and a determination must be made concerning whether any of the National Register criteria considerations (36 Code of Federal Regulations [CFR] 60.4) make the property ineligible. Considerable information has been gathered through studies for the ECO Substation Project, Southwest Powerlink, and Sunrise Powerlink Project concerning the types of cultural resources present in the ECO Substation and transmission line corridor. Although cultural resources have been identified that may meet one or more of the National Register eligibility criteria, none have been proposed as TCPs. The indefinite, unsupported conclusion of adverse effect to TCPs in the EIR/EIS should be removed. In particular, the conclusion that impacts to unidentified, undescribed TCPs are unmitigable is not supported by the information gathered to date for the Project area. In the event that a property is identified as eligible for inclusion in the National Register and is demonstrated to be a TCP through documentation during the Section 106 consultation process, every effort will be made to</p>

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
					avoid and minimize impacts to the property to a level that is less than significant. Therefore, SDG&E recommends the impact be classified as Class II, rather than Class I.
D.8 – Noise					
33.	D.8.3.2	D.8-19	2	Construction activities may be required beyond the hours stipulated in the County Noise Ordinance to allow for materials delivery at night and to comply with the Caltrans weight limits on state highways...The nighttime construction noise levels could be above the ambient noise level and would occur outside the hours of construction permitted under Section 36.408 of the County Noise Ordinance. Therefore, SDG&E would partially mitigate for the nighttime noise impacts with implementation of APM ECONOI-1, which will ensure that nighttime construction activities would not cause noise that would exceed an hourly average of 45 dB when measured at the border of the nearest residence. If this standard cannot be met, SDG&E will communicate this to the County in advance. However, since the nighttime construction impacts cannot be fully mitigated, impacts would remain adverse. Under CEQA, these impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	The EIR/EIS states that delivery and subsequent filling of the transformers during nighttime hours would violate Section 36.408 of the Noise Ordinance and result in a Class I impact. However, delivery of the transformers and other unanticipated construction-related night work can be (and in the past has been) conducted in compliance with the County’s Noise Ordinance and related procedures. The CPUC has documentation of compliance with the County’s Noise Ordinance for similar work on previous projects and has considered this a Class II impact on other similar projects—including projects in urban areas, such as SDG&E’s Silvergate Transmission Substation Project—where the same impact was considered a Class II impact. Moreover, portions of the Silvergate Transmission Substation Project occurred in urban areas near many sensitive receptors, whereas the ECO Substation Project is located in more sparsely populated communities and therefore has less potential to impact sensitive receptors. Additionally, SDG&E not anticipate that noise levels would exceed an hourly average of 45 dB when measured from the nearest residence, and believes that considering this a Class I impact greatly overstates the impacts associated with the actual activity that is being proposed for the ECO Substation Project.
34.	D.8.3.2	D.8-20-21	1 & 2	<p>The noise level generated by a helicopter is 95 dBA at 200 feet. There are five residences with property boundaries located within approximately 235 feet of helicopter use that may experience temporary noise levels due to helicopter use in excess of a 75 dBA average between 7 a.m. and 7 p.m. Implementation of APM ECO-NOI-3 would ensure that no residents within 235 feet would be exposed to any helicopter noise by limiting the location of helicopter use and by relocating residents where helicopter use cannot be avoided. Impacts to sensitive noise receptors along the 138 kV transmission line ROW due to helicopter noise would not be adverse if the residents agree to relocation, as described in APM ECO-NOI-3. However, because it is not known whether residents would agree to temporary relocation, the helicopter noise impact is considered adverse and cannot be reliably mitigated. Under CEQA, noise impacts from helicopter use are considered significant and may not be mitigated to a level that is considered less than significant (Class I).</p> <p>Under CEQA, noise impacts from blasting are considered significant and may not be mitigated to a level that is considered less than significant (Class I).</p>	<p>The EIR/EIS concludes that helicopter use and blasting activities during construction pose significant and unavoidable impacts. The impacts analysis of helicopter use does not appear consistent with typical powerline helicopter construction. Helicopters used for powerline construction do not hover in one place for extended periods of time, and would be limited in time and scope given that they are used for only a very short duration in any one, given location, and would occur in a sparsely populated area. Therefore, it is not anticipated that helicopter use would violate the County’s Noise Ordinance, and the EIR/EIS should be revised to reflect that this construction activity constitutes a Class III impact.</p> <p>The existing language in the EIR/EIS indicates that the use of helicopters would result in adverse impacts to sensitive receptors. SDG&E would like to clarify that it proposed applicant-proposed measure APM NOI-3 to minimize inconvenience to nearby residents, not because it determined these impacts as Class I. Therefore, noise impacts would not be considered adverse and should be revised to a Class II impact. Further, noise from helicopter use during construction in previous projects has not been determined to be a Class I impact. For example, the Otay Mesa Power Purchase Agreement Transmission Project Draft EIR concluded that construction noise, including that from helicopters, could be mitigated and would thus be a Class II impact (page D.8-12).</p> <p>Additionally, blasting activities would comply with the limits of the County’s Noise Ordinance, by limiting construction activities so that noise will not exceed an hourly average of 45 dB when measured at the border of the nearest parcel with an inhabited residence, as detailed within the PEA. As a result, none of these impacts should be categorized as Class I. Similarly, on page D.8-21, it is presumed that blasting would result in a Class I impact. The impacts are also inconsistent with conclusions the CPUC has drawn in the past regarding noise impacts, such as for the Miguel-Mission 230 kV #2 Project where blasting impacts were not classified as significant, and the Valley Center Substation Project, where a Mitigated Negative Declaration was prepared, indicating no Class I impacts despite the use of blasting. Thus, the EIR/EIS should be revised accordingly.</p>

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
D.9 – Transportation and Traffic					
No comments					
D.10 – Public Health and Safety					
No comments					
D.11 – Air Quality					
No comments					
D.12 – Water Resources					
35.	D.12	D.12-9 and D.12-20	5	No surface water features were identified at the Boulevard Substation Rebuild site.	The EIR/EIS states that there are no surface drainage features at the Boulevard Substation rebuild site. The EIR/EIS should be updated to state that there is an existing man-made drainage feature located on the Boulevard Substation Relocation site that would be permanently impacted in order to improve it to handle flows, resulting in a 0.03-acre impact.
36.	D.12	D.12-3 and D.12-4	Table D.12-1		Table D.12-1 Surface Water Resources should be updated to reflect additional survey information completed since the submission of the PEA. Updated drainage impacts for the Project and the ECO Substation Alternative Site are provided in Table 4: Jurisdictional Drainage Impacts in Acres in Attachment A – Updated Project Description and ECO Substation Alternative Site.
D.13 – Geology					
37.	D.13.1.1	D.13-27	2	Expansive soils can also cause problems to structures because they can undergo changes in volume as a result in changes in moisture content. Soils that exhibit shrink-swell behavior are clay rich. Two of the natural soil types identified within the ECO Substation Project area have moderate to high shrink-swell potential; one soil type, rough broken land, has a variable shrink swell potential. The majority of the soils that underlay the ECO Substation Project site have low clay content and low shrink-swell potential. Impacts as a result of expansive soils on the site would be adverse; therefore, Mitigation Measure GEO-2, which supersedes APM ECO-GEO-01 and provides further clarification, would ensure that impacts due to expansive soils would mitigate this impact by ensuring that the shrink-well capacity of the soils on the project site are identified and that specific actions are identified to reduce impacts associated with these soils, such as potentially replacing the soil with engineered soil. Under CEQA, impacts would be significant but can be mitigated to a level that is considered less than significant (Class II).	The shrink and swell characteristics of soils is not dependent on the clay content, but instead the type of clay. A soil could have a very high clay content with potential for expansion. The potential for expansion is also based on the climatology. Soils in arid regions derived from granitic bedrock typically have low potential for expansion. SDG&E recommends that Section D.13 be revised to indicate that the potential for expansion in the Project area is low and would not conflict with standard transmission line or substation design, and would therefore be considered a Class III, rather than a Class II impact. This impact is supported by the field studies that were conducted by URS Corporation and presented in the PEA as Attachment 4.6-A: Interim Geotechnical Investigation.
D.14 – Public Services and Utilities					
No comments					
D.15 – Fire and Fuels Management					
38.	D.15	D.15-11	4	The Witch, Guejito, and Rice fires that occurred in 2007 in San Diego County involved low-voltage SDG&E power line failure caused by inadequate maintenance practices, enabling windy conditions to result in vegetation ignition.	The EIR/EIS conclusion that the Witch, Guejito, and Rice fires of 2007 were caused by SDG&E’s maintenance practices is unfounded. SDG&E denies that its maintenance practices were inadequate and that those practices played a role in the start of the Witch, Guejito, or Rice fires. Litigation concerning the cause of the Witch, Guejito, and Rice fires is ongoing, and there has been no finding of fault by SDG&E with respect to any of these fires. This statement thus bears no relevance to the assessment of potential fire impacts associated with the ECO Substation Project. Therefore, this statement should be removed from the Final EIR/EIS.
39.	D.15	D.15-33	2	SDG&E, on the other hand, is responsible for notifying CAL FIRE on days where the SWPL’s reliability is critical and prescribed burns should not take place adjacent to the SWPL, as well as for filing the appropriate paperwork with CAL FIRE when requesting CAL FIRE assistance regarding vegetation management activities within the SDG&E easement.	The end of the discussion on the SWPL Memorandum of Understanding implies that SDG&E would conduct vegetation clearing under the lines after filing appropriate paperwork with the California Department of Forestry and Fire Protection (CalFIRE). It should be clarified that SDG&E would only participate as a partner with CalFIRE when such clearing would mutually benefit both parties.

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
40.	D.15	D.15-39 & 59	3	The presence of the 138 kV transmission line in an area where fire history indicates fires are likely to recur, and where there are currently limited aerial obstructions, would have the potential of significantly impacting aerial firefighting efforts.	The EIR/EIS concludes that the presence of a 138 kV line would cause significant and unavoidable (Class I) impacts related to aerial firefighting. This is an overly conservative conclusion. Approximately 9 miles of the 13.4-mile-long 138 kV line, would be adjacent to the taller, existing SWPL line. The EIR/EIS does not account for the fact that the addition of a shorter, lower voltage transmission line into this already existing environmental setting would not significantly and unavoidably constrain aerial firefighting. Therefore, SDG&E recommends that the EIR/EIS be revised accordingly.
41.	D.15.3.3	D.15-39	Table D.15-4		The EIR/EIS concludes that the presence of Project facilities, including overhead transmission lines, would increase the probability of a wildfire and would be a Class I impact. The CPUC approved the Miguel-Mission 230 kV #2 Project in 2004 and the Otay Metro Power Loop (OMPL) Project in 2005. Although both the Miguel-Mission 230 kV #2 Project and the OMPL Project were determined to have greater fire-related impacts than the ECO Substation Project, the CPUC determined that fire prevention best management practices along with CPUC general orders were sufficient to reduce impacts to a less-than-significant level. Moreover, language in the EIR for the OMPL Project provides considerable details regarding the rarity of transmission line failures. Accordingly, SDG&E recommends that the EIR/EIS be amended to identify impacts as Class II, rather than Class I.
D.16 – Social and Economic Conditions					
No comments					
D.17 – Environmental Justice					
No comments					
D.18 – Climate Change					
SDG&E’s comments to the climate change section of the document are included in SDG&E’s cover letter and are herein incorporated by reference.					
E – Comparison of Alternatives					
No comments					
F – Cumulative Scenario and Impacts					
SDG&E’s comments to the cumulative section of the document are included in SDG&E’s detailed comment letter and are herein incorporated by reference.					
G – Required CEQA/NEPA Topics					
42.	G.3	G.3-5	Table G-1	With mitigation impacts would remain adverse and under CEQA significant and unavoidable (Class I) to Traditional Cultural Properties (TCPs) as avoiding direct and indirect impacts to TCPs such as traditional landscapes, topographic elements including sacred mountains, or use areas may not be completely feasible given the geographic expanse of some of these resources.	Under the Project Specific Impact Description column for ECO-CUL-3, it is stated that impacts to TCPs would remain significant and unavoidable even with mitigation. However, there are no identified tangible, defined TCPs within the Project area, as previously described in Comment 32.
43.	G.3	G.3-6	Table G-1	With mitigation incorporated construction noise would create adverse and under CEQA significant and unavoidable (Class I) temporary noise impacts associated with nighttime noise, and, use of helicopters and blasting.	Under the Project Specific Impact Description column for ECO-NOI-1, it is stated that impacts resulting from construction noise would remain significant and unavoidable pertaining to nighttime noise and use of helicopters and blasting. However, as stated previously in Comment 34, the characterization of the impacts from helicopter noise is overstated and should be revised to be Class II. If blasting activities are required during Project construction, nearby residents would be provided prior notification, and the activities would be conducted in compliance with the County’s Noise Ordinance, as detailed within the PEA. Additionally, although certain activities may be required during off-peak hours, with the implementation of applicant-proposed measure (APM) NOI-01, construction activities would be kept within County’s nighttime noise threshold, or prior notice would otherwise be provided. Necessity for these activities would also be limited and temporary.

Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
44.	G.3	G.3-6	Table G-1	Even with the proposed mitigation measures, the source of potential conflict (i.e., the presence of the overhead transmission line) would remain, and the potential for reduced aerial and ground-based firefighter effectiveness would be adverse and cannot be reliably mitigated. Under CEQA, impacts would be significant and cannot be mitigated to a level that is considered less than significant (Class I).	Under the Project Specific Impact Description column for ECO-FF-2, it is stated that with mitigation, the presence of the overhead transmission line would reduce aerial and ground firefighter effectiveness, so the impact would remain significant and unavoidable. It is SDG&E’s position, however, that although the presence of the 138 kV transmission line could create limited aerial obstructions, firefighting activities can safely be accomplished adjacent to transmission lines.
H – Mitigation Monitoring and Reporting					
45.	H	H-4	2		There is no description or identification of a variance process or Project scope change process within the outline of the Mitigation Monitoring, Compliance, and Reporting Program. The EIR/EIS should outline a process to deal with the potential need for minor changes or variances to the Project during final design and construction.
I – Public Participation					
No comments					
J – Report Preparation					
No comments					
Appendices					
1 – Special-Status Species Detected or Potentially Occurring on the Project Site					
46.	App. 1	Global	Global		The table of special-status species includes plant species with no “federal, state, or other” special status and is CNPS List 3 species, which are not considered under CEQA. These species should be removed from the table. However, only CEQA evaluation of CNPS List 1A, List 1B, and List 2 species is mandatory. While these species are included on the County’s Sensitive Plant List as List D, according to the County’s Guidelines for Determining Significance – Biological Resources, impacts to these species should only be considered if “the project would impact the local long-term survival of a County List C or D plant species.” Potential Project impacts to these List D species would be minimal, would not impact the local long-term survival of the species, and would not be significant; thus, mitigation should not be required.
2 – Jurisdictional Impact Tables					
47.	App. 2	2-1	Table 2-1, Row 1		Appendix 2 states that there are impacts to Mixed Desert Scrub, but Table D.2-3 classifies that vegetation community as “Sonoran Mixed Woody Succulent Scrub.” Titles of vegetation communities should be consistent throughout the document.
48.	App. 2	2-1	Table 2-1, Rows 7 and 8		The appropriate numbers for vegetation and hydrological impacts are provided in Attachment A – Updated Project Description and ECO Substation Alternative Site.
49.	App. 2	2-1	Table 2-1, Row 9	Information in the Table provides that temporary impacts to QCB habitat will be 0.95 acres and permanent impacts will be 0.55 acres and will occur only on private land.	The correct number is 2.78 acres of permanent impacts to QCB habitat; there would be no temporary impacts.
3a – Visual Resources Methodologies and Assumptions					
No comments					
3b – Visual Resources Inventory Summary					
No comments					
4 – Visual Contrast Rating Sheets					
No comments					
5 – Landscape Concept Plans					
No comments					
6 – Visual Resource Consistency Tables					
No comments					

Attachment C – Technical Corrections and Clarifications
 East County Substation Project Draft EIR-EIS



Comment #	Section Name	Page #	Paragraph or Table #	Existing Language	General Comment
7 – Land Use Consistency Tables					
No comments					
8 – Air Quality and Greenhouse Gas Revisions to Applicant’s Environmental Information					
No comments					

Overriding Considerations

- The development of renewable resources is a priority for the State of California. California law requires source electric generation to be 20% from renewable sources by 2010, and in November 2008, Governor Schwarzenegger signed Executive Order S-14-08, directing all state agencies to work towards a 33% Renewable Portfolio Standards (RPS) by 2020. Draft EIR/EIS at A-7, A-11 – A-12.
- Recently, on September 23, 2010, pursuant to its authority under Assembly Bill 32 (AB 32), the California Air Resources Board (CARB) adopted the “Renewable Electricity Standard” (RES) to require a 33% by 2020 renewable energy procurement mandate for most retail sellers of electricity in California, including but not limited to San Diego Gas & Electric Company (SDG&E). *Id.* at A-7 – A-8, A-11 – A-12. The RES is an independent requirement from California’s existing RPS, which requires a 20% by 2010 renewable energy procurement mandate.¹
- Pursuant to AB 32, California is also obligated to reduce the production of greenhouse gas (GHG) to 1990 levels by 2020, and both the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) recommended 33% renewables as a key strategy to reducing GHG emissions. *See* CPUC Decision D.08-10-037 in Rulemaking (R.) 06-04-009 (October 2008), which represents the joint efforts of the CPUC and the CEC in preparing recommendations on GHG regulatory strategies to CARB and discusses modeling demonstrating reduced greenhouse gas emissions associated with development of renewable energy; *see also* CEC, “Final Opinion on Greenhouse Gas Regulatory Strategies,” filed on October 28, 2008, in its Docket #07-OII-1.

The East County (ECO) Substation Project (Project) will provide a wide range of substantial economic, legal, social, technological and other benefits to the region, including but not limited to, facilitating California’s renewable energy goals within a reasonable timeframe, advancing the State’s efforts to reduce its carbon emissions consistent with AB 32 (Stats. 2006, ch. 488), furthering federal energy policies and goals, and helping create green jobs and boosting the local economy. *See also* Draft EIR/EIS at A-7 – A-8, A-11 – A-12; SDG&E Proponent’s Environmental Assessment, Section 2.0 (Purpose and Need) (incorporated herein by reference). More specifically, these benefits include:

- Delivering Renewable Energy – Experts have identified the San Diego and Imperial Counties / Baja California Mega-Region as one of the top locations in the United States for renewable energy. Recent studies indicate this Mega-Region could become a global showcase for clean energy with a potential of more than 17,600 megawatts (MW) of renewable electricity: Solar Energy – 6,870 MW; Wind Energy – 9,302 MW including Baja California; Geothermal Energy – 1,434 MW; and Biomass Energy – 66 MW. RETI, *Phase 2B Final Report* at 1-1 - 1-3, 6-6 – 6-7

¹ CARB, Resolution 10-23 (Sept. 23, 2010), *available at* <http://www.arb.ca.gov/regact/2010/res2010/res1071attb.pdf>.

Attachment D – Overriding Considerations East County Substation Project Draft EIR-EIS



(May 20, 2010). These references are to gross potential without project specific economic analysis. *Id.*

- The ECO Substation Project will deliver clean power into the electric grid by connecting proposed renewable energy projects in Eastern San Diego County and Mexico to the existing SWPL transmission line. Draft EIR/EIS at A-7 – A-8, A-11 – A-12. The Project will provide an interconnection hub for renewable generation that will eliminate the need for multiple generator-owned or -operated substations or switching stations along SDG&E’s existing SWPL 500 kilovolt (kV) transmission line. This project will help SDG&E meet state requirements to produce 33% of its power from renewable resources by 2020. The ECO Substation Project will also facilitate meeting federal Energy Policy Act requirements for 10,000 MW of renewable energy on public lands by 2015 (Pub. L. 109-58, Section 211 (2005)) and further Interior Department Secretarial Orders, policies and directives related to renewable energy development. Draft EIR/EIS at A-6.
- Emissions and Fossil Fuel Dependence – By accessing locally-sourced renewable energy, the new ECO Substation Project will help reduce the region’s dependence on imported electricity generated from fossil fuels and cut GHG emissions. The ECO Substation Project will tap into the vast renewable energy potential of the San Diego/Imperial Valley/Baja California region and help the area become a national leader in clean energy development. Draft EIR/EIS at A-7 – A-8, A-11 – A-12.
- Improving Energy Reliability in Rural Eastern San Diego County – Rebuilding the Boulevard Substation and adding the 138 kV transmission line, as part of the ECO Substation Project, will improve electric grid reliability and reduce the potential for outages in local communities such as Jacumba, Boulevard, and Campo. The ECO Substation Project will replace aging infrastructure and provide more direct access to reliable power in the area. *Id.* at A-11 – A-12. Creating Jobs and Boosting the Local Economy – The ECO Substation Project will create 89 jobs at peak construction, many of which will be filled by hiring locally. In addition, the ECO Substation Project will facilitate the creation of hundreds, if not thousands, of “green” jobs at related renewable energy projects that will use the ECO Substation Project to connect to the grid. In addition, it is estimated that the ECO Substation Project will inject approximately \$36 million directly into the local economy through contracts for goods and services, and create tax revenue for local public agencies. These increases in employment and revenue will greatly benefit the region, especially during these difficult economic conditions. Draft EIR/EIS at D.16-14 (workforce of 89 workers needed to construct ECO during peak construction; estimated \$36 million in local contracts).