

D. Community Groups

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Response to Comment Letter D1

San Diego County Archaeological Society, Inc.
James W. Royle Jr., Chairperson
July 5, 2012

D1-1 As stated in the Environmental Impact Report (EIR), Section A.4, Reader's Guide to This EIR, Subsection A.4.1, Available for Review, San Diego Gas & Electric's (SDG&E's) Proponent's Environmental Assessment (PEA), and other supporting documentation, submitted as part of Application No. 10-06-007 for the South Bay Substation Relocation Project, contain certain information that is incorporated by reference in some sections of this EIR. These documents, including the Cultural Resources Study, as referenced in Section D.6.6 of the EIR, are available for public review on the California Public Utilities Commission (CPUC) project website (<http://www.cpuc.ca.gov/environment/info/dudek/sbsrp/SouthBaySub.htm>) and during normal business hours at the following locations:

Civic Center Branch Library
365 "F" Street
Chula Vista, California 91910

South Chula Vista Branch Library
389 Orange Avenue
Chula Vista, California 91911

D1-2: As stated in the EIR, Section D.6, Cultural and Paleontological Resources, although the probability of subsurface archaeological deposits within the project area appears to be low, based on previous work in the general area, and project research conducted for the Proposed Project, construction activities may result in the loss of previously unidentified or unknown cultural resources. During construction, SDG&E would apply Applicant Proposed Measures (APMs) and Mitigation Measures CUL-1 and CUL-2 to ensure that impacts to unknown cultural resources would be less than significant.

In response to this comment, Mitigation Measure CUL-1 in Section D.6 has been modified in the Final EIR to ensure that a qualified archaeologist is on site during initial grading and trenching. The change and addition to the EIR do not raise new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the California Environmental Quality Act (CEQA) Guidelines.

D1-3 The comment regarding the tank farm site and current substation site as preferable from a cultural resources perspective is noted and will be included in the administrative record and considered by CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required.

D1-4 Comment noted. Please refer to Response D1-2.

Response to Comment Letter D2

Environmental Health Coalition

Laura Hunter, Policy Advisor

July 19, 2012

- D2-1** Please refer to common response GEN1 regarding the public review period extension request as well as responses to comment letter D5.

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Response to Comment Letter D3

Pacifica Companies
Allison Rolfe, Director of Planning
July 20, 2012

D3-1 Please refer to common response GEN1 regarding the public review period extension request and responses to comment letter D6.

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Response to Comment Letter D4

**South Bay Wildlife Advisory Group
Allison Rolfe, Advisory Board Co-Chair
James A. Peugh, Advisory Group Member
July 20, 2012**

- D4-1** Please refer to common response GEN1 regarding the public review period extension request and response to comment letters B5 and B6.

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Response to Comment Letter D5

**Environmental Health Coalition
Laura Hunter, Policy Advisor
August 29, 2012**

- D5-1** The comment is noted and will be included in the administrative record and considered by the California Public Utilities Commission (CPUC) during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Environmental Impact Report (EIR); therefore, no additional response is provided or required.
- D5-2** The commenter's support of the project is noted and will be included in the project record, and the CPUC will consider this comment during project deliberation.
- Please refer to common responses ALT1 and ALT2 regarding the alternatives analysis conducted in the EIR.
- D5-3** Please refer to common response ALT1 regarding the Bayfront Enhancement Alternative as well as responses to the San Diego Audubon Society comment letter D7.
- D5-4** The comment is noted and will be included in the administrative record and considered by CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required.
- D5-5** Please refer to common responses ALT1 and ALT2 regarding the alternatives analysis conducted in the EIR.
- D5-6** Please refer to common response ALT2 regarding the alternatives analysis conducted in the EIR specific to Coastal Act and applicable land use regulations consistency.
- D5-7** The commenter's support of the Air Insulated Substation configuration over the Gas Insulated Substation configuration is noted and will be included in the administrative record and considered by CPUC during project deliberation
- D5-8** The commenter's support of the project is noted and will be included in the project record, and the CPUC will consider this comment during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Alternative.

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Response to Comment Letter D6

Pacifica Companies

Allison Rolfe

August 30, 2012

D6-1 The commenter's support of the project is noted and will be included in the project record, and the California Public Utilities Commission (CPUC) will consider this comment during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Alternative.

Please also refer to response to comment letter A1 – U.S. Fish and Wildlife Service.

D6-2 Please refer to common responses ALT1 and ALT2.

D6-3 Please refer to response D6-1.

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Response to Comment Letter D7

**San Diego Audubon Society
James A. Peugh
Conservation Committee Chair
August 30, 2012**

D7-1 Please refer to common responses ALT1 and ALT2 regarding the alternatives analysis conducted in the EIR.

D7-2 The evaluation of alternatives in the Environmental Impact Report (EIR) was done in accordance with Section 15126.6(d) of the California Environmental Quality Act (CEQA) Guidelines, which state that the EIR shall include sufficient information about each alternative to allow for meaningful evaluation and analysis, and comparison with the proposed project. Given the comprehensive nature of the alternatives analysis, the California Public Utilities Commission (CPUC) has determined that sufficient information is presented in the EIR as required by CEQA and that the same level or detail as provided for the proposed project is not required for each alternative.

The EIR provides generalized centroid locations for the varying accuracy and circle sizes from the California Natural Diversity Database (CNDDDB) records. This includes both Belding's savannah sparrow and light-footed clapper rail as being recorded within the vicinity. In addition, the EIR text describes the variety of special-status wildlife species that are known to occur within the San Diego Bay National Wildlife Refuge (NWR) and specifically within the South Bay Unit. These special-status species include the Belding's savannah sparrow and light-footed clapper rail, among others. Thus, although the J Street Marsh is not mentioned specifically, it is included in the analysis of wildlife use.

The EIR includes Mitigation Measures BIO-7, BIO-8, and BIO-9 to address noise, disturbance to adjacent nesting birds, and raptor perches.

D7-3 See response to California Department of Fish and Game comment B8-10 and the modifications to Section D.5.1.6 in the Final EIR for additional information on the existing conditions and wildlife use of Telegraph Creek. In addition, please refer to common response ALT1.

Cumulative impacts are discussed in Section F.4 of the EIR. The evaluation of alternatives in the EIR was done in accordance with Section 15126.6(d) of the CEQA Guidelines, which state that the EIR shall include sufficient information about each alternative to allow for meaningful evaluation and analysis, and

comparison with the proposed project. Given the comprehensive nature of the alternatives analysis, the CPUC has determined that sufficient information is presented in the EIR as required by CEQA and that the same level of detail as provided for the Proposed Project is not required for each alternative.

D7-4 The EIR is correct in not identifying any areas within the study area as an Environmentally Sensitive Habitat Area (ESHA). Section D.5.1.6 provides a discussion of the determination of ESHAs on site and concludes, based on the site conditions, that no portions of the study area are anticipated to be ESHAs. Since that time, the Coastal Commission Staff Report (California Coastal Commission 2012) provided concurrence with that conclusion in stating that the property was not identified as ESHA and included an exhibit (Exhibit 12a; Coastal Commission 2012) that indicated no ESHA on site. The J Street Marsh is located outside of the study area by 300 to 800 feet as determined by the measurement along the project study area boundary.

Please refer to response D7-3 regarding the evaluation of alternatives in the EIR. The Draft EIR, Section F.5, contains a complete discussion of cumulative effects, in accordance with the requirements of California Environmental Quality Act (CEQA). Pursuant to certification by the California Coastal Commission, the Chula Vista Bayfront Master Plan (CVBMP) and specifically, the Port District's Port Master Plan (PMP) are considered applicable land use plans in Section D.10, Land Use and Planning. In addition, as noted in Section F.5, the CVBMP is addressed as a cumulative project (). Therefore, the Draft EIR does in fact appropriately consider the Proposed Project in the context of the CVBMP, as well as other cumulative projects, as listed in Section F.5. Please also refer to common response GEN2 regarding the adequacy of the EIR analysis and to common response ALT2 regarding consideration of the CVBMP in the EIR.

D7-5 The EIR includes Mitigation Measures BIO-7 and BIO-8, to address indirect impacts including noise and disturbance to adjacent nesting birds. In addition, please refer to common response ALT1.

Please refer to response D7-3 and D7-4 regarding cumulative impacts and the alternatives analysis.

D7-6 See response to California Department of Fish and Game comment B8-10 and the modifications to Section D.5.1.6 in the Final EIR for additional information on the existing conditions and wildlife use of Telegraph Creek. In addition, please refer to common responses ALT1 and ALT2.

- D7-7** The EIR includes Mitigation Measures BIO-7 and BIO-8 to address indirect impacts to special-status species including noise and disturbance to adjacent nesting birds. These special-status species, including light-footed clapper rail and Belding’s savannah sparrow are addressed as being present in the San Diego NWR. Please also see response to comment B8-10 and the modifications to Section D.5.1.6 in the Final EIR for additional information on the existing conditions and wildlife use of Telegraph Creek. In addition, please refer to common response ALT1.
- D7-8** The comment is noted and will be included in the administrative record and considered by the CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required. In addition, please refer to common response ALT1.
- D7-9** The comment is noted and will be included in the administrative record and considered by the CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required. In addition, please refer to common response ALT1.
- D7-10** The comment is noted and will be included in the administrative record and considered by the CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required.
- D7-11** In response to this comment, Mitigation Measure BIO-9 in Section D.5.3.3 has been modified in the Final EIR. These changes and additions to the EIR do not raise important new issues about significant effects on the environment. Such changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines.
- D7-12** Comment is noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative.

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Response to Comment Letter D8

**South County EDC
Cindy Gompper-Graves, President and CEO
August 31, 2012**

- D8-1** The commenter's support of the project is noted and will be included in the project record, and the California Public Utilities Commission will consider this comment during project deliberation.

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Response to Comment Letter D9

Living Coast Discovery Center
Brian E. Joseph, DVM, Executive Director
August 30, 2012

D9-1 The commenter's support of the project is noted and will be included in the project record, and the California Public Utilities Commission (CPUC) will consider this comment during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Fund Alternative.

D9-2 Comment is noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and the Bayfront Enhancement Fund Alternative.

D9-3 The commenter's support of the project is noted and will be included in the project record, and the CPUC will consider this comment during project deliberation.

The Environmental Impact Report (EIR) in Section D for each environmental issue area, as well as in Section E, Comparison of Alternatives, does disclose the benefits of the Proposed Project as well as whether alternatives evaluated would or would not also result in these benefits, such as visual impacts and compatibility with the Chula Vista Bayfront Master Plan (CVBMP). However, as discussed in common response ALT1, in determining the environmentally superior alternative, the EIR analysis does not consider the beneficial impacts of any alternative above and beyond its ability to reduce or avoid significant effects of the Proposed Project.

Please refer to common response ALT1 regarding the Bayfront Enhancement Fund Alternative.

D9-4 The comment is noted and will be included in the administrative record and considered by CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the EIR; therefore, no additional response is provided or required.

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