

## E. Applicant

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## Response to Comment Letter E1

**San Diego Gas & Electric**  
**Dave Geier, Vice President – Electric Operations**  
**August 31, 2012**

**E1-1** The commenter’s support of the proposed project is noted and will be included in the administrative record and considered by California Public Utilities Commission (CPUC) during project deliberation.

The comment regarding CPUC’s approval is acknowledged. As stated in the Draft Environmental Impact Report (EIR), Section E, Comparison of Alternatives, “although this EIR identifies an Environmentally Superior Alternative, it is possible that the CPUC could choose to balance the importance of each impact area differently and reach a different conclusion during the project approval process. Therefore, the Commission may approve a project that is not the Environmentally Superior Alternative.”

The commenter’s support of the Proposed Project is noted. Please refer to common response ALT1 regarding the methodology used to screen alternatives including the Bayfront Enhancement Alternative and the Environmentally Superior Alternative.

**E1-2** Comment is noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and the Bayfront Enhancement Fund Alternative.

**E1-3** Please refer to common response ALT1 regarding the methodology used in screening alternatives.

The CPUC determined that the Existing South Bay Substation Site Alternative meets California Environmental Quality Act (CEQA) criteria for project objectives and specifically the objective of accommodating regional energy needs. This determination was based on SDG&E’s Proponent’s Environmental Assessment (PEA) and response to the CPUC’s Data Request 13, dated March 19, 2012, as provided below.

### CPUC Data Request 13–Question

“Please indicate whether construction and operation of an Air Insulated Substation as well as Gas Insulated Substation is feasible within the existing South Bay Substation site. In the event the footprint needs to be expanded under either the Air Insulated Substation or Gas Insulated Substation configuration,

please identify the area that would be expanded. If there are any additional issues that should be considered, please so note.”

SDG&E Response

“The construction and operation of an Air Insulated Substation in the existing South Bay Substation site is technologically feasible and would require approximately 3 additional acres. From a technical standpoint, replacing the current 138/69 kV South Bay Substation with a rebuilt 230/69/12 kV substation (Air Insulated Substation or Gas Insulated Substation) on the existing site is electrically very similar to the Preferred Project. This alternative will meet some of the four objectives identified for the Preferred Project, including meeting NERC/WECC/CAISO reliability criteria. However, it does not meet all of the four objectives, specifically compliance with the MOU, with the City of Chula Vista.”

- E1-4** Comment is noted. Please refer to common response ALT1 regarding the methodology used in screening alternatives including screening of the Bayfront Enhancement Fund Alternative.
- E1-5** Comment noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and methodology used to screen the Bayfront Enhancement Fund Alternative. The 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. 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.
- E1-6** Comment is noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and the Bayfront Enhancement Fund Alternative.
- E1-7** Comments noted. Please refer to response E1-28, which considered information provided in Attachment A, Figures; response E1-29, which considered information provided in Attachment B, Bayfront Enhancement Alternative Description and Preliminary Impact Analysis; and common response ALT1 regarding the methodology used in screening alternatives including screening of the Bayfront Enhancement Fund Alternative.

With regard to comments on mitigation measures presented in the Draft EIR as provided in Attachment C, Proposed Mitigation Measure Revisions, please refer to responses E1-30 to E1-55.

With regard to comments on the Draft EIR provided in Attachment D “Technical Corrections and Clarifications,” please refer to responses E1-56 to E1-191.

**E1-8** The commenter’s support of the Proposed Project is noted and will be included in the administrative record and considered by CPUC during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Fund Alternative.

**E1-9** The comment states that the Draft EIR is adequate and complete with respect to the Proposed Project; therefore, no additional response is provided or required. 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.

**E1-10** Comment noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and Bayfront Enhancement Alternative as well as responses E1-3 and E1-5 regarding project objectives and benefits.

**E1-11** Comment is noted. Please refer to response E1-28, which considered information provided in Attachment A, Figures; response E1-29, which considered information provided in Attachment B, Bayfront Enhancement Alternative Description and Preliminary Impact Analysis; and common response ALT1 regarding the methodology used in screening alternatives including screening of the Bayfront Enhancement Fund Alternative.

**E1-12:** With regard to comments about mitigation measures presented in the Draft EIR, as provided in Attachment C, Proposed Mitigation Measure Revisions, please refer to responses E1-30 to E1-55.

With regard to comments on the Draft EIR provided in Attachment D “Technical Corrections and Clarifications,” please refer to responses E1-56 to E1-191.

**E1-13:** Please refer to response E1-12.

**E1-14:** Comment noted. Please refer to common response ALT1 regarding the Environmentally Superior Alternative and response E1-3 and E1-5 regarding project objectives and benefits.

**E1-15:** Comment noted. Please refer to response E1-3 regarding the Existing South Bay Substation Site Alternative. The No Project Alternative is evaluated in the EIR as

required by CEQA and described in Section C.7 of the EIR. As provided in Section C.7, the EIR acknowledges the system reliability issues under the No Project Alternative and provides actions that can be reasonably expected to occur if the project is not approved.

**E1-16:** The EIR acknowledges that the Existing South Bay Substation Site Alternative would require an additional 3 acres to accommodate the Air Insulated Substation configuration. Please refer to common response ALT1 regarding the methodology used in screening alternatives. The CPUC determined that the Existing South Bay Substation Site Alternative meets CEQA criteria for technical feasibility based on SDG&E’s PEA and response to the CPUC’s Data Request 13, dated March 16, 2012 (see response E1-3).

**E1-17:** Comment noted. Please refer to response E1-3 regarding the Existing South Bay Substation Site Alternative’s ability to meet reliability requirements.

The EIR Section C.7, No Project Alternative, describes as part of the No Project Alternative the reasonably foreseeable events that would occur under the No Project Alternative including upgrades that would be required to meet reliability needs. The impacts identified under the No Project Alternative in Sections D and E include analysis of these reasonable foreseeable upgrades.

**E1-18:** Comment noted. Please refer to response E1-17.

**E1-19:** Please refer to common response ALT1 regarding the methodology used in screening alternatives and to common response ALT2 regarding the EIR consideration of the Chula Vista Bayfront Master Plan (CVBMP) in comparing alternatives.

**E1-20** The 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 land use compatibility with the CVBMP. For example, as stated in Section D.10, Land Use and Planning (see Subsection D.10.3.3, Bay Boulevard Substation (Impact LU-3)), the Draft EIR states that removal of the existing substation facility would be consistent with future Port Master Plan (PMP) amendment plans to redevelop the site with commercial recreation uses; at the time of Draft EIR publication, the PMP had not yet been approved by the California Coastal Commission, thus making it a draft document. Additional analysis regarding the Proposed Project and the PMP and the Bayfront Specific Plan is included in Section D.10, Land Use and Planning (see Table D.10-3). Please refer to common response ALT2 regarding the EIR consideration of the CVBMP. In addition, the disturbed nature of the Bay Boulevard Substation site is

disclosed in Section D.5, Biological Resources (see Subsections D.5.1.1, Regional Setting, and D.5.1.3, Vegetation), and the aesthetic environment resulting from implementation of the Proposed Project is discussed in Section D.2, Aesthetics (see Subsection D.2.3, Environmental Impacts and Mitigation Measures, and Section D.2.4.9, No Project Alternative).

Understanding of the 138 kV transmission line as part of the Gas Insulated Substation Alternative was determined to meet all CEQA screening criteria for alternatives and therefore remains as a component of this alternative. Please refer to Response E1-105.

The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-21:** The EIR evaluates the environmental consequences and potential impacts that the Proposed Project and the alternatives would create. The impacts identified were compared with predetermined, specific significance criteria, based on CEQA Guidelines, and were classified according to the significance criteria listed in each issue area. The same methodology was applied systematically to each alternative. A comparative analysis of the Proposed Project and the alternatives is provided in Section E of this EIR.

Please refer to responses E1-3, E1-17, and E1-18 regarding the Existing South Bay Substation Site Alternative's as well as the No Project Alternative's ability to meet reliability requirements.

**E1-22:** Details provided by SDG&E in this comment regarding Attachment A, Figures, and Attachment B, Bayfront Enhancement Alternative Description and Preliminary Impact Analysis, to this comment letter are noted and will be included in the administrative record and considered by the CPUC during project deliberation. Please refer to response E1-28, which considered information provided in Attachment A, Figures; response E1-29, which considered information provided in Attachment B, Bayfront Enhancement Alternative Description and Preliminary Impact Analysis; and common response ALT1 regarding the methodology used in screening alternatives, including screening of the Bayfront Enhancement Fund Alternative.

**E1-23:** Comments noted. Please refer to responses E1-30 through E1-55 for responses to comments raised in Attachment C, Proposed Mitigation Measure Revision.

- E1-24:** Please refer to responses E1-56 through E1-191 for responses to comments raised in Attachment D, Proposed Technical Corrections and Clarifications.
- E1-25:** Comments are noted. Please refer to GEN2 regarding the general adequacy of the EIR and need for recirculation and common response ALT1 regarding the methodology used in screening the Bayfront Enhancement Fund Alternative.
- E1-26:** Comment noted. Please refer to response E1-5 regarding the Environmentally Superior Alternative and Bayfront Enhancement Alternative and E1-3, E1-15, and E1-17 regarding project objectives.
- E1-27:** Comments noted. Please refer to response E1-7.

#### **RESPONSES TO ATTACHMENT A, FIGURES**

- E1-28:** Details provided by SDG&E regarding the Bayfront Enhancement Alternative in Attachment A, Figures, to this comment letter are noted and will be included in the administrative record and considered by the CPUC during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Fund Alternative.

#### **RESPONSES TO ATTACHMENT B, BAYFRONT ENHANCEMENT ALTERNATIVE DESCRIPTION AND PRELIMINARY IMPACT ANALYSIS**

- E1-29:** Details provided by SDG&E regarding the Bayfront Enhancement Alternative in Attachment B, Bayfront Enhancement Alternative Description and Preliminary Impact Analysis, to this comment letter are noted and will be included in the administrative record and considered by the CPUC during project deliberation. Please refer to common response ALT1 regarding the Bayfront Enhancement Fund Alternative.

#### **RESPONSES TO ATTACHMENT C, MITIGATION MEASURES**

- E1-30:** Comment noted. Mitigation Measure BIO-1 gives full credit for SDG&E's Natural Community Conservation Plan (NCCP). In response to this comment, Mitigation Measure BIO-1 has been modified in the Final EIR to document the habitat types that are considered sensitive that thus require mitigation. This mitigation measure is consistent with what is required by the resource agencies; see response to California Department of Fish and Game B8-1. 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.

- E1-31:** In response to this comment, Mitigation Measure BIO-2 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.
- E1-32:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure BIO-3 are required.
- E1-33:** In response to this comment, Mitigation Measure BIO-4 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.
- E1-34:** In response to this comment, Mitigation Measure BIO-5 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.
- E1-35:** This comment regarding Mitigation Measure BIO-6 is noted. After consideration of this comment, the CPUC has determined that revisions to the mitigation requirements provided in Mitigation Measure BIO-6, other than updating the CDFG survey protocol, are not required. It should be noted that since publication of the Draft EIR, a new edition of the Staff Report on Burrowing Owl (CDFG 1995) has been published. References have been updated to CDFG 2012 in Mitigation Measure BIO-6 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.
- E1-36:** In response to this comment, Mitigation Measure BIO-7 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.
- E1-37:** In response to this comment, Mitigation Measure BIO-8 has been modified in the Final EIR. It should be noted that no change has been made to the noise level in the mitigation measure. This is a standard noise level used by the resource agencies to determine potential indirect impacts to nesting special status species. 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.

- E1-38:** In response to this comment, Mitigation Measure BIO-9 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.
- E1-39:** In response to this comment, Mitigation Measure BIO-10 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.
- E1-40:** In response to this comment, Mitigation Measure BIO-11 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.
- E1-41:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure CUL-1 are required.
- E1-42:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure CUL-2 are required.
- E1-43:** After consideration of this comment, the CPUC has determined that no revisions to Mitigation Measure G-1 are necessary.
- E1-44:** After consideration of this, comment the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure HAZ-2 are required. Please refer to responses to Department of Toxic Substances Control comment letter B3.
- E1-45:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure HAZ-3a and HAZ-3b are required.
- E1-46:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure HAZ-4 are required.
- E1-47:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure HYDRO-1 are required.
- E1-48:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in the mitigation requirement provided in Mitigation Measure HYDRO-2a are required.

- E1-49:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure HYDRO-2b are required.
- E1-50:** In response to this comment, Mitigation Measure HYDRO-2c in Section D.9, Hydrology and Water Quality, 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.
- E1-51:** In response to this comment, Mitigation Measure NOI-1 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.
- E1-52:** After consideration of this comment, the CPUC has determined that no revisions to the mitigation requirements provided in Mitigation Measure TRA-1 are required.
- E1-53:** In response to this comment, Mitigation Measure TRA-2 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.
- E1-54:** In response to this comment, Mitigation Measure TRA-4 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.
- E1-55:** In response to this comment, Mitigation Measure TRA-6 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.

**RESPONSES TO ATTACHMENT D, TECHNICAL CORRECTIONS AND CLARIFICATIONS**

- E1-56:** Section D of the Draft EIR provides for each environmental issue a separate environmental impact analysis along with applicable mitigation measures for each alternative fully evaluated in the Draft EIR. As discussed in the Draft EIR, Section G, Mitigation Monitoring and Reporting, if the project or an alternative is approved by the CPUC, a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) will be prepared for the approved project, which will further identify the mitigation requirements. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment.

**E1-57:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-58:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

Disagreement among experts, consultants, or attorneys regarding the material, data, or significance determinations and alternatives analysis and conclusions does not mean the EIR is legally inadequate. It is up to the lead agency to evaluate the presented material and data and make its own reasoned determination regarding the material's accuracy. Case law clearly establishes the right of the lead agency to accept one expert opinion over another, so long as the decisions are supported by substantive evidence. Where experts or other agencies challenging the results or methodology of the document have raised comments, the EIR has provided a reasoned and good faith analysis in response, as well as a discussion related to why the analysis may, or may not, contradict any conflicting opinions. Such reasoning is based upon substantial evidence in order to support the EIR's approach.

**E1-59:** In response to this comment, Figures B-3 and B-3a have 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.

**E1-60:** Comment noted. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions. Please see response E1-57.

**E1-61:** In response to this comment, the stated acreage of the Tank Farm, Toy Storage and Cima NV alternative sites in the Executive Summary, Sections C, Section D.5, and Section D.8 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.

**E1-62:** Section D.5.3.3 of the Draft EIR (see Impact BIO-5) states that construction activities are anticipated to directly impact a single individual of one rare plant (decumbent goldenbush); however, with implementation of applicant proposed measures (APMs) including APM-BIO-6, which is specific to decumbent

goldenbush, impacts were determined to be less than significant. It should be noted that APMs were proposed by SDG&E to avoid or minimize the project's potential impacts to biological resources. Decumbent goldenbush is a narrowly distributed plant species restricted to the Southern California region. Hence, the significance determination for the impacts on the species meet the severity, extent, and context criteria.

- E1-63:** Please refer to common response ALT1 regarding the methodology used to screen project alternatives. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-64:** Please refer to common response ALT1 regarding the methodology used to screen project alternatives.
- E1-65:** In response to this comment, the referenced height of the steel angle pole in the Executive Summary (Section ES.2.3) and Section B (Section B.4.3) 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.
- E1-66:** In response to this comment, the discussion of removed 138 kV steel lattice structures in Section ES.2.3.2 and Section B.4.4 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.
- E1-67:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-68:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-69:** Please refer to response E1-61.
- E1-70:** Please refer to response E1-61.
- E1-71:** Please refer to response E1-61.
- E1-72:** In response to this comment, the construction of new poles, as discussed in Section ES.7.8, 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.

- E1-73:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions. See the Draft EIR, Section D.8, Public Health and Safety, discussion under Impact HAZ-6.
- E1-74:** In response to this comment, Section A.2 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.
- E1-75:** Please refer to common response ALT1 regarding the methodology used to screen project alternatives.
- E1-76:** In response to this comment and in response to comment E1-79, Table A-1 in Section A 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.
- E1-77:** Table A-1 provides a list of permits required only, and therefore, the CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment.
- E1-78:** In response to this comment, Table A-1 in Section A 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.
- E1-79:** In response to this comment and in response to comment E1-76, Table A-1 in Section A 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.
- E1-80** In response to this comment, Section B.1 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.

- E1-81:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-82:** In response to this comment, Figures B-3 and B-3a have 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.
- It should be noted that the substation’s internal road layout as depicted in Figure D-1, Air Insulated Substation Detailed Project Components Map, is not the same layout as depicted in Attachment 3-A, Detailed Project Components Map 1 of 3 of the PEA. Therefore, this change is not reflected in the Final EIR. In addition, the figures have not been revised to depict the overhead portions of the 69 kV and 138 kV lines.
- E1-83:** In response to this comment, Section B.4.1 and Figures B-4, B-5, and B-7 have 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.
- E1-84:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-85:** In response to this comment, Section B.4.1 (see 230 kV Transmission Components) 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.
- E1-86:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-87:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-88:** In response to this comment, Section B.4.2 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.

- E1-89:** In response to this comment, Section B.4.3 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.
- E1-90:** In response to this comment, Section B.4.4 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.
- E1-91:** In response to this comment, Table B-1 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.
- E1-92:** The durations required for each project activity reflect the anticipated construction schedule submitted by SDG&E to the CPUC on September 27, 2011, in Data Request 9. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-93:** Figure B-14 reflects the Bay Boulevard limits of permanent and temporary disturbance as depicted on Figure 3-7 of the PEA. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-94:** In response to this comment, Section B.6.4.2 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.
- E1-95:** In response to this comment, Section B.6.4.5 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.
- E1-96:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

- E1-97:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-98:** APMs are listed in Table B-12, and other environmental standards implemented by SDG&E are described in Section D. For example, Section D.5, Biological Resources, describes the relevant SDG&E NCCP protocols that would be implemented during construction of the Proposed Project. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-99:** Please refer to common response ALT1 regarding the methodology used to screen project alternatives, including the technical feasibility of the Air Insulated Substation at the Existing South Bay Substation site.
- E1-100:** The avoidance of impacts to the emergent wetland located in the drainage alongside Bay Boulevard under the Gas Insulated Substation Alternative site is depicted in Figures D.5-4 and D.5-5 of the Draft EIR. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-101:** In response to this comment, Section C.5.1 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.
- E1-102:** In response to this comment, Section C.5.1 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.
- E1-103:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-104:** In response to this comment, Section C.5.1 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.

- E1-105:** The characterization of the 138 kV extension associated with the Gas Insulated Substation Alternative was provided by SDG&E (see SDG&E response to Data Request 5, dated 5/24/2011). Understanding of the 138kV transmission line as part of the Gas Insulated Substation Alternative was determined to meet all CEQA screening criteria for alternatives and therefore remains as a component of this alternative.
- E1-106:** Please refer to Response E1-105.
- E1-107:** Please refer to common response ALT1 regarding the methodology used to screen project alternatives including the Bayfront Enhancement Alternative.
- E1-108:** In response to this comment, Section D.2.1.1 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.
- E1-109:** In response to this comment, Section D.2.1.1 (see Bay Boulevard Substation) 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.
- E1-110:** In response to this comment, Section D.2.1.1 (see Transmission Interconnections) 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.
- E1-111:** In response to this comment, Section D.2.3.5 (see Transmission Interconnections, Impact AES-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.
- E1-112:** In response to this comment, Section D.2.3.5 (see Transmission Interconnections, Impact AES-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.
- E1-113:** In response to this comment, Section D.2.3.5 (see Transmission Interconnections, Impact AES-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.

**E1-114:** As noted in SDG&E’s response to Data Request 9, dated September 27, 2011, construction was approximated to begin in April 2012 and to end in June 2015 (a period of 38 months). While the April 2012 start date is no longer applicable, the anticipated duration of activities as specified in SDG&E’s response to Data Request 9 was used to determine a 38-month construction schedule.

**E1-115:** Please see response to comment E1-114 above. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-116:** In response to this comment, Section D.5.1.1 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.

**E1-117:** In response to this comment, Section D.5.1.2 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.

**E1-118:** The California Natural Diversity Database (CNDDDB) is referenced on Figure D.5-2 and the figure is titled “CNDDDB Special-Status Species.” The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-119:** According to the Jurisdictional Wetland Delineation Report prepared by Merkel & Associates and submitted with the PEA, a small portion of the study area is mapped as former tidelands with a larger area mapped as Huerhuero complex soils, one of the soils types within which vernal pools occur. Hence there is a potential for vernal pools given the proximity of other pools in the region and the presence of grass poly, which is considered a vernal pool–associated plant species according to the source cited in the section.

In response to this comment, Section D.5.1.3 (specifically, the last sentence of the Seasonal Ponds/Seasonal Wetland discussion) 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.

- E1-120:** Based on the analysis of distribution, soils, habitat, and CNDDDB records, Section D.5 Biological Resources identifies special-status plant species with potential to occur in the Proposed Project area. Rare plant surveys were conducted for the Proposed Project, and the results of the survey are disclosed in the document to identify special-status species present on site. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions. Please see response E1-58.
- E1-121:** In response to this comment, Sections D.5.1.6, D.5.3.3, D.5.3.5, and Attachment D.5-1 (the inclusion of the California horned lark as a special-status species) have been modified in the Final EIR. Because the status of this species was changed from Species of Special Concern to a watch list species, it is no longer included in the category of special-status species; however, it would continue to be addressed as a migratory bird species. 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.
- E1-122:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-123:** In response to this comment, Section D.5.1.6 (see fourth paragraph) 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.
- E1-124:** In response to this comment, Section D.5.1.6 (see American Peregrine Falcon) 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.
- E1-125:** In response to this comment, Section D.5.1.6 (see Light-Footed Clapper Rail) 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.
- E1-126:** The Draft EIR concludes that no impacts to San Diego fairy shrimp would occur during construction of the Proposed Project (see Section D.5.3.3, Impact BIO-7).

Although the document states that San Diego fairy shrimp have potential to occur on site due to recorded occurrences in the area, the Draft EIR also states that wet and dry-season sampling of the seasonal wetlands within the Proposed Project site did not detect any federally listed endangered brachiopod species. In response to this comment, Section D.5.1.6 has been modified in the Final EIR to clarify that while there was a high potential for the San Diego fairy shrimp to occur, the focused surveys concluded it is not present. 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.

**E1-127:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-128:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-129:** Jurisdictional resources were provided in the Draft EIR for informational purposes only and do not affect the analysis and conclusions reached in the EIR. The acreage provided in Table D.5.2 as referenced in the Draft EIR is based on data received from SDG&E. As noted in the Draft EIR, the determination of jurisdiction is subject to change depending on the decision of the regulatory agencies. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-130:** Please refer to Table D.5-2. The 17 seasonal ponds/seasonal wetlands referenced in the text include Features 1 through 11, 19 through 22, and 24 through 26. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-131:** Please refer to response E1-129.

**E1-132:** Please refer to response E1-129.

**E1-133:** In response to this comment, Section D.5.2 (see “Local”) 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.

- E1-134:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-135:** In response to this comment, the text of APM-BIO-05 has been modified in the Final EIR to be exactly what was stated in the PEA. 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.
- E1-136:** The vegetation communities impacted by construction and operation of the Proposed Project are listed in Table D.5-4, and impacts are discussed in detail in Section D.5.3. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-137:** In response to this comment, the title of Table D.5-4 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.
- E1-138:** As noted in Table D.5-4: “To calculate permanent impacts, Dudek utilized geographic information system (GIS) data for vegetation communities and permanent impacts associated with the Bay Boulevard Substation provided by SDG&E, as well as transmission pole footprint and foundation data included in the SDG&E PEA. Temporary impacts were calculated by utilizing GIS data provided by SDG&E and the project’s temporary workspace requirements identified in the SDG&E PEA.” Thus, the impact analysis is based on the calculation of impacts and not a worst-case scenario. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions. Please see response E1-58.
- E1-139:** In response to this comment, Section D.5.3.3 (see Impact BIO-1) 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.
- E1-140:** In response to this comment, Section D.5.3.3 (see Impact BIO-2) 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.

- E1-141:** In response to this comment, Table D.5-5 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.
- E1-142:** In response to this comment, Section D.5.3.3 (Impact BIO-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.
- E1-143:** In response to this comment, Section D.5.3.3 (Impact BIO-7) 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.
- E1-144:** In response to this comment, Section D.5.3.3 (Impact BIO-6) has been modified in the Final EIR, and citations of scientific literature have been added. 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.
- E1-145:** In response to this comment, the description of APM-BIO-03 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.
- E1-146:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions. Please see response E1-58.
- E1-147:** In response to this comment, Section D.5.3.3 (Impact BIO-9) has been modified in the Final EIR to clarify that the potential temporary features include trenches and excavations. 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.
- E1-148:** In response to this comment, Section D.5.3.3 (Impact BIO-9) 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.

- E1-149:** While the Draft EIR states that the Proposed Project would be exempt from local plans, a consistency analysis regarding the Proposed Project and policies of local plans established to protect biological resources is provided (see Section D.5.3.3, Impact BIO-12). The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-150:** In response to this comment, Section D.5.3.4 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.
- E1-151:** In response to this comment, the description of non-raptor breeding season as defined in the NCCP 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.
- E1-152:** In response to this comment, Section D.5.3.5 (see Impact BIO-1) 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.
- E1-153:** In response to this comment, Section D.5.3.5 (see Impact BIO-10) 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.
- E1-154:** In response to this comment, Section D.5.4.1 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.
- E1-155:** In response to this comment, Section D.5.4.1 has been modified in the Final EIR. Reference to MSCP Tiers and requirements has been deleted. However, as noted in Section D.5.1.4, non-native grassland is considered a sensitive plant community. 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.
- E1-156:** In response to this comment, Section D.5.4.2.1 has been modified in the Final EIR. The location of the potential indirect impact to nesting birds within the San

Diego National Wildlife Refuge (NWR) has been revised. 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.

**E1-157:** In response to this comment, the characterization of helicopter activities 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.

**E1-158:** In response to this comment, Section D.5.4.5.2 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.

**E1-159:** In response to this comment, Section D.6.1 (record searches and field survey) and Section D.6.3.3 have 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.

**E1-160:** In response to this comment, Section D.7.1 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.

**E1-161:** In response to this comment, Section D.7 (Subsection D.7.2) 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.

**E1-162:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-163:** In response to this comment, Section D.8 (Subsection D.8.4.2.1) 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.

**E1-164:** In response to this comment, Section D.9.2 (see “Federal”) 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.

- E1-165:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-166:** In response to this comment, Table D.9-1 in Section D.9 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.
- E1-167:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-168:** As shown in Figure 3-4 of the Certified Final EIR for the CVBMP, the proposed Bay Boulevard Substation site located within the jurisdiction of the Port. In addition, the proposed substation site is also located within the CVBMP boundary (see Figure 3-7 of the Certified Final EIR for the CVBMP). The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-169** Please see response to comment E1-168 above. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment a since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-170:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-171:** 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.

The Draft EIR provides an analysis of wetlands associated with the Gas Insulated Substation Alternative (see Section D.5, Subsection D.5.4.1).

- E1-172:** In response to this comment, Table D.10-3 in Section D.10 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.
- E1-173:** In response to this comment, Table D.10-3 in Section D.10 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.
- E1-174:** Please refer to response to comment E1-168, which discusses the jurisdictional boundaries of the Proposed Project site. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-175:** Please refer to common response ALT2 regarding consideration of the CVBMP in the alternatives analysis.
- E1-176:** Please refer to response to comment E1-175. The Draft EIR discloses that construction of the Gas Insulated Substation Alternative at the existing South Bay Substation site and the Air and Gas Insulated Substation Alternatives at the Power Plant Site would not further the redevelopment goals of the CVBMP (see Section 10.4.3.2 and D.10.4.4). Please refer to common response ALT2 regarding consideration of the CVBMP in the alternatives analysis.
- E1-177:** In response to this comment, Section D.12.3.3 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
- E1-178:** The Draft EIR discusses the recreational policies of the California Coastal Act (see Section D.10, Table D.10-3 (California Coastal Act Policy, Articles 2 and 3)). Please refer to common response ALT2 regarding consideration of the CVBMP in the alternatives analysis
- E1-179:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.
- E1-180:** The construction schedule and number of construction trips provided in the Draft EIR is based on data received from SDG&E. The CPUC has determined that no

clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-181:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-182:** In response to this comment, Section D.16, Subsection D.16.4.1, 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.

**E1-183:** The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

**E1-184:** In response to this comment, Section D.17.2 (see “State”) 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.

**E1-185:** In response to this comment, Section D.17.2 (see “State”) 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.

**E1-186:** In response to this comment, Section D.17.3.3 (see Impact GHG-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.

**E1-187:** Table E-1 presents the worst-case impact determination for each alternative by issue area as discussed in Sections D.2 to D.17. As noted in the footnotes to Table E-1, a “-“ or a “+” in the table cells indicates whether implementation of the alternative reduces project environmental effects or whether the alternative increases effects. Table E-1 indicates that implementation of the Gas Insulated Substation Alternative at the proposed site and the Air Insulated Substation/Gas Insulated Substation Alternatives at the Existing South Bay Substation Site would result in reduced biological resource impacts when compared to the Proposed Project. The evaluation of project alternatives (Section E.2) states that the Gas Insulated Substation Alternative at the existing site would avoid impacts to

seasonal ponds and that impacts to jurisdictional waters would be reduced with the Air Insulated Substation/Gas Insulated Substation Alternatives at the Existing South Bay Substation site due to an absence of seasonal ponds. The CPUC has determined that no clarification or revisions are required to the Draft EIR as a result of this comment since proposed revisions in this comment would not alter the EIR analysis, mitigation requirements, or conclusions.

- E1-188:** In response to this comment, Section F.1.2 has been modified in the Final EIR. This change and addition 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.
- E1-189:** Please refer to responses E1-30 through E1-55 for responses to comments raised in Attachment C, Proposed Mitigation Measure Revision.
- E1-190:** In response to this comment, Section F.5.7 has been modified in the Final EIR. This change and addition 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.
- E1-191:** As stated in the Draft EIR, Section G, Mitigation Monitoring and Reporting, was prepared to address CEQA Guidelines Section 15097.
- E1-192:** In response to this comment, the introduction to Section G has been modified in the Final EIR. This change and addition 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.

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