8.0 Other Revisions to IS/MND

This section includes revisions identified by the California Public Utilities Commission (CPUC) as needed to clarify the Draft Initial Study/Mitigated Negative Declaration (IS/MND). None of these revisions result in new or more severe environmental impacts. All revision page numbers and table references described below refer to the respective references in the Draft IS/MND document.

Figure Updates

To ensure consistency with commenter-requested changes made to the Draft IS/MND's text, figures, and appendices, updates have been incorporated into the following additional project figures:

- Figure 5.12-1: Noise-Sensitive Receptors within 1,000 Feet of the Proposed Project Vicinity
- Figure 5.14-1: Public Services near the Proposed Project Vicinity

These updated figures have been inserted into the Final IS/MND.

Text Updates

pp. i through xiv

The Table of Contents and Acronyms and Abbreviations list have been updated to reflect the changes described in this section, as well as changes incorporated into the document as a response to a public comment. Revisions to the Table of Contents and the Acronyms and Abbreviations list are indicated and in ~~strikethrough~~ and underline.

pp. 1-1

Page 1-1 of the Draft IS/MND has been revised to reflect an updated point of contact for the project.

Contact: ~~Stacie Atkinson~~ Ms. Elizabeth Beaver, Regulatory Affairs
~~(858) 654-6471 or satkinson@semprautilities.com~~
(858) 654-1787 or ebeaver@semprautilities.com

pp. 1-2

Page 1-2 of the Draft IS/MND has been revised to clarify the geographic setting of the project utility infrastructure and additional work activities.

The project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity of TL6973.

[…]

SDG&E has stated that the proposed project is necessary to improve access to utility infrastructure currently located in environmentally sensitive areas within the San Dieguito and Los Peñasquitos lagoons.

pp. 1-3 through 1-4

Pages 1-3 through 1-4 of the Draft IS/MND have been revised to clarify additional potential project approvals in Table 1-1.

Table 1-1 Potential Project Approvals

Permit/Approval	Agency	Requirement
Archaeological Resources Investigation and Collection Permit	California Department of Parks and Recreation	Permit to Conduct Archaeological Investigation/Collections on State Parks land
Paleontological Resources Investigation and Collection Permit.	California Department of Parks and Recreation	Permit to Conduct Paleontological Investigation/Collections on State Parks land

The following paragraph has been added to Section 1.4, "Environmental Determination" to describe the Draft IS/MND public review process and the new chapters included in this Final IS/MND.

On December 6, 2018, the CPUC circulated the Draft IS/MND for the TL674A Reconfiguration and TL666D Removal Project for public review in compliance with CEQA and CPUC Rule 17.1. The Draft IS/MND was also filed with the State Clearinghouse on December 6, 2018, initiating a 30-day public review period. Written comments from two public agencies, one tribal organization, the applicant, and four residents were received during the public review period. Following closure of the public review period on January 7, 2019, the CPUC prepared responses to comments received, and the IS/MND was revised, as appropriate to reflect these comments. The comments and associated responses are presented in Chapter 7.0 of this document. Additional revisions made to the IS/MND are presented in Chapter 8.0.

pp 1-5

Page 1-5 of the Draft IS/MND has been revised to list **MM GEN-1**, for consistency with Table 6-1 of the Mitigation Monitoring and Reporting Plan (MMRP). **MM GEN-1** was included in Chapter 6.0, "Mitigation Monitoring and Reporting Plan," of the Draft IS/MND, but was erroneously omitted from Chapter 1.0, "Mitigated Negative Declaration"; therefore, insertion of **MM GEN-1** does not trigger recirculation of the IS/MND.

MM GEN-1: Implementation of All APMs. The applicant shall implement all APMs as stated in this environmental document, except in cases where specific APMs were superseded by mitigation measures. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.

pp. 1-5 through 1-14

Some public comments necessitated minor revisions to existing mitigation measures from the Draft IS/MND. Pages 1-5 through 1-14 of the Draft IS/MND describe those mitigation measures. Where changes have been made, mitigation measures described in these pages have been updated to reflect their

final text. Final text revisions to mitigation measures have also been incorporated into Chapter 5.0, "Environmental Setting and Impacts," and Chapter 6.0, "Mitigation Monitoring and Reporting Plan."

pp. 1-10

APM-BIO-09 has been removed from page 1-10 of the Draft IS/MND, as this portion of the document is intended to list only mitigation measures. All APMs that are incorporated as part of the proposed project, including APM BIO-09, are described in Table 4-9, and in Chapter 6.0 "Mitigation Monitoring and Reporting Plan."

> ~~**APM BIO-09:** Prior to construction, a habitat survey for potential bat roosts that may be impacted by construction activities will be conducted. During the survey, potential roost sites will be searched for signs of bat use, such as urine streaking, grease marks and droppings, moth wings, and dead bats. Up to two weeks prior to construction, a qualified biologist will conduct bat surveys at roost sites identified as potentially active from signs of bat use identified during the survey. If bats are detected, SDG&E will avoid conducting construction activities that may directly impact the active roost site. If an active maternal roost is identified, no construction will occur within 200 feet of the maternal roost during the pupping season (typically April 1 through August 31).~~

pp. 3-1

Page 3-1 of the Draft IS/MND has been revised to reflect additional project activities that would occur at the existing Del Mar Substation.

> The proposed project would also include the removal and replacement of a circuit breaker at the existing Del Mar Substation to accommodate increased ampacity associated with TL6973.

pp. 3-3 through 3-4

Pages 3-3 through 3-4 of the Draft IS/MND have been revised to reflect the CEQA Guidelines Update, which became effective on December 28, 2018, after publication of the Draft IS/MND for the TL674A Reconfiguration and TL666D Removal Project. Refer to Chapter 3.0, "Introduction to the Initial Study," for all revisions pertaining to the CEQA Guidelines Update.

pp. 3-4

Page 3-4 of the Draft IS/MND has been amended to clarify why revisions to the Draft IS/MND do not require recirculation.

3.2.5 Revisions to the Draft IS/MND and Why Recirculation is not Required

On February 5, 2019, the Applicant submitted to the CPUC an email request to include supplemental information related to removal and replacement of a circuit breaker within the existing Del Mar Substation. According to the applicant, this work may be required in order to accommodate increased ampacity associated with the new TL6973 segment that would be established as part of the proposed

project. Details related to the potential circuit breaker removal and replacement work are included as text revisions to the Draft IS/MND in Chapter 4.0, "Project Description," Sections 4.5.2 and 4.6. Text revisions have also been incorporated in the relevant environmental analyses (see specifically Sections 5.3, "Air Quality"; 5.6 "Geology and Soils"; 5.7, "Greenhouse Gases"; 5.8 "Hazards and Hazardous Materials"; 5.12, "Noise"; 5.16, "Transportation and Traffic"; and 5.19, "Mandatory Findings of Significance") to sufficiently cover any potential environmental effects associated with the circuit breaker removal and replacement work as a component of the overall project evaluated in this IS.

Section 15073.5 of the State CEQA Guidelines requires recirculation of a Negative Declaration when the document must be "substantially revised" after public notice of its availability has previously been given pursuant to Guidelines Section 15072, but prior to its adoption. A "substantial revision" as defined in Guidelines Sections 15073.5(b) entails:

(1) [identification of] a new, avoidable significant effect and mitigation measures or project revisions [that] must be added [to the Negative Declaration] in order to reduce the effect to insignificance; or

(2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant levels and new measures or revisions must be required.

Recirculation is not required pursuant to CEQA Guidelines Section 15073(c) under the following circumstances: (1) mitigation measures are replaced with equal or more effective mitigation measures; (2) new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration, that are not new or avoidable significant effects; (3) measures or conditions of approval are added after the circulation of the negative declaration that are not required by CEQA, that do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect; and (4) new information is added to the negative declaration that merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The current revisions and clarifications to the proposed project do not amount to "substantial revisions" because no new avoidable effect has been identified resulting from the circuit breaker removal and replacement work described in the text revisions. The potential activities at the Del Mar Substation would not result in any new significant impacts in the Draft IS/MND, nor would these changes increase the severity of any of the project's less-than-significant impacts identified in this Draft IS/MND. Mitigation measures identified in the IS/MND would continue to be required in order to reduce or avoid the less-than-significant environmental impacts of the project, and the additional work incorporated through revisions to this IS/MND would not eliminate the need to implement any of the mitigation measures identified in the Draft IS/MND or necessitate any substantial revisions. Finally, no new or modified measures would be required in order to mitigate environmental impacts that may be associated with the circuit breaker removal and replacement at the Del Mar Substation because no significant impacts or impacts of greater severity would occur if this additional project

component were implemented as described in text revisions in Chapters 4.0, "Project Description" and 5.0, "Environmental Setting and Impacts."

pp. 4-1 through 4-39

SDG&E's comments on the Draft IS/MND requested updates to project components based on current engineering design. To ensure that all project components were up to date, CPUC submitted Data Request #4 to SDG&E on February 5, 2019. Data Request #4 requested that SDG&E provide additional clarifying information regarding the following project components. Where necessary, the Final IS/MND has been updated to reflect this information.

pp. 4-1

Connecting TL674A/6973 to the Del Mar Substation could increase ampacity[1] through and may necessitate possible removal and replacement of, an existing circuit breaker located within the substation.

pp. 4-1

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pp. 4-2

The main ~~activity~~ activities associated with the proposed project involves the removal of an existing overhead 69-kV power line (TL666D) between the existing Del Mar Substation (located northwest of the intersection of Interstate 5 [I-5] and Via De La Valle in the city of San Diego) and an existing steel pole (located near the intersection of Vista Sorrento Parkway and Pacific Plaza Drive, also in the city of San Diego) and the potential replacement of an existing circuit breaker on substation property.

pp. 4-8

The proposed project may also require removal and replacement of a circuit breaker at the Del Mar Substation to accommodate ampacity of TL6973D, which would have a higher voltage rating (and would be renamed TL6973) as part of the project.

pp. 4-18

Circuit Breaker Removal and Replacement

Circuit breakers safely control the flow of energy at all voltage levels across a grid by switching electrical currents on and off through the use of mechanical switching devices. When switched to an open position, breakers use insulation to cut currents immediately. When switched to a closed position, breakers ensure optimal current flow. Types of circuit breakers differ based on the method used to extinguish electrical arcs and interrupt current. The four most common types of breakers use air, oil, sodium hexafluoride (SF_6) or vacuum.

A total of eight 69-kV and 14 12-kV circuit breakers, transformers, switch gears, and other equipment are located at the Del Mar Substation, an approximately 48,520-square-foot outdoor facility enclosed by perimeter fencing underlain by a concrete pad. Since filing the project application and Proponent's Environmental Assessment (PEA) (SDG&E 2017) with the CPUC in June 2017, SDG&E has identified a possible need to replace one existing oil-filled circuit breaker, installed in 1990, in order to accommodate increased ampacity associated with TL6973, where it would feed into the substation as part of the proposed project. The breaker subject to possible removal is located along the substation's northern edge, about 60 feet east of its existing control building. According to the applicant, the removal of TL666D and connection of TL6974D with a higher voltage rating provides opportunity to modernize the breaker and associated hardware to current design standards, which specify use of SF_6 breakers.

SDG&E would prepare a detailed engineering review of the current substation foundation to determine whether the foundation would be adequate to support the new breaker. If the original foundation is not adequate to support the new circuit breaker, a new foundation would be designed and constructed. To commission the new circuit breaker, wiring within the boundary of the substation would be modified and/or replaced, as needed. If construction work were required, the replacement activities would occur within the existing substation fence line. (See Sections 4.6.1, "Construction Workforce and Equipment"; 4.6.10, "Access;" 4.7.4, "Circuit Breaker Removal and Replacement"; and 4.8, "Schedule" for additional information relating to circuit breaker removal/replacement construction activities.)

pp. 4-25

The following rows have been revised in Table 4-4 (in alphabetical order):

Table 4-4 Construction Equipment Type and Use

Equipment Type	Equipment Use
Dump/Hall Truck	Transporting excavated materials and importing backfill and debris disposal
Forklift	Delivery and disposal of circuit breaker equipment
Loader	Tractor with front bucket for moving materials
Trencher/Ditch Witch	Excavating trenches
Water Truck	~~Suppressing dust~~ Non-potable water transport for dust suppression

pp. 4-31

The following row has been inserted into Table 4-7:

Table 4-7 Road Access Characteristics

Type of Road	Description	Width (in feet)	Length (in feet)	Area (in acres)
Paved, public roadway characterized as two-lane Community Collector, with continuous turning lane in project area.	Access to Del Mar Substation provided from private driveway off of Via de la Valle	N/A	N/A	N/A

Vehicle access to the Del Mar Substation would be from the substation's existing private driveway that leads from Via de la Valle. At the beginning of the workday, crew members would typically meet at one of the proposed project's staging areas/fly yards and leave personal vehicles parked at these locations. From there, crew trucks and other vehicles would travel to and park within the existing substation. Some temporary parking south of the substation along Via de la Valle may be required, depending on the construction activities occurring on a particular day. Additional temporary parking (outside of the substation parking lot) would allow for maneuvering of vehicles, equipment, and material deliveries, including during peak construction periods. The applicant does not anticipate a need for street parking on the west side of the substation.

pp. 4-38

4.7.4 Circuit Breaker Removal and Replacement

While the actual number and type of vehicles required for circuit breaker removal and replacement phase of the proposed project would vary depending on the construction activities occurring each day, the common types anticipated for the work are presented in Table 4-7(b). It is anticipated that a forklift would be used to remove the existing circuit breaker and place the new breaker into position. The forklift would operate within the fenced portion of the substation during replacement work. Nighttime work is not anticipated during this phase of the proposed project. Anticipated work hours would be consistent with the remainder of the proposed project and, unless dictated otherwise by permit conditions, would comply with applicable local noise ordinances regarding nighttime noise levels.

The circuit breaker and associated hardware would be removed from the substation site and then taken to an existing SDG&E yard. If possible, parts would be separated to serve as emergency replacement parts for other equipment currently in service. The remaining parts would be brought to a local contracted middle scrap company for disposal. SDG&E's best management practices would be implemented as applicable during this process.

~~4.7.4~~ 4.7.5 Clean Up and Post-Construction Restoration

pp. 4-39

The following rows have been inserted (after C738 Conversion) into Table 4-8:

Table 4-8 Construction Schedule by Activity, Duration and Project Component

Project Component, Activity	Duration (months)	Number of Crew
Circuit Breaker Removal and Replacement		
Below-grade construction (circuit breaker removal, foundation system, conduit from TL673)	1.75	N/A
Above-grade construction (circuit breaker installation)	2.0	N/A

pp. 4-39

The circuit breaker replacement process would be initiated after the TL674A Reconfiguration is complete. As a result, it would overlap with the TL666D Removal, C510 Conversion, and C738 Conversion.

pp. 5.3-6

Page 5.3-6 of the Draft IS/MND has been revised to clarify that an educational learning center in the project area is identified as an additional sensitive receptor. Further, the substation equipment removal and replacement activities has been incorporated.

For the purposes of this analysis, sensitive receptors in the project area consist of residential uses (single- and multi-family housing), schools, educational learning centers, and parks and recreational areas.

[…]

Implementation of the proposed project would result in reconfiguration of the local electrical network in which high-wire overland distribution lines would be replaced with circuitry underground and ancillary substation equipment would be removed and replaced to ensure proper network functionality. The physical changes to the network resulting from the proposed project address system reliability and would not alter or increase the network's current capacity or electrical throughput. ~~As such, the proposed project's occasional maintenance and repair needs would constitute the operational phase with regard to assessing air quality impacts.~~

pp. 5.3-7

The following row has been inserted (above row "All") into Table 5.3-4.

Table 5.3-4 Proposed Project Nearest Sensitive Receptors

Project Component and Activity	Equipment and Vehicle Use During Construction	Approx. Duration (months)	Nearest Sensitive Receptor (feet approx.)	Receptor Type [(a)]
Circuit Breaker Removal Replacement, Del Mar Substation				
Circuit breaker removal, potential foundation work, debris removal/ off-haul, replacement breaker installation	Loaders, trencher, forklifts, Jackhammer, Dump/Haul Truck	3.75	228	Therapeutic Learning Center

pp. 5.3-15 through 5.3-16

Pages 5.3-15 through 5.3-16 of the Draft IS/MND have been amended to clarify that the revisions made to the CalEEMod reflect overall emissions, including outputs from anticipated circuit breaker removal and replacement activities, and to clarify that maintenance activities would not involve the use of helicopters. Additionally, revisions have been incorporated that accurately clarify the approximate percentage decrease in $PM_{2.5}$ and PM_{10} emissions (accounting for Table 5.3-8 and 5.3-9 revisions) that would result from incorporation of project APMs.

The model calculates the maximum daily emissions for a range of pollutants. The CalEEMod inputs and outputs are provided in an air quality emissions report that was prepared for the proposed project, as revised to reflect overall emissions, including outputs from anticipated circuit breaker removal and replacement activities (Appendix A).

[…]

As shown in Table 5.3-9, implementation of air quality APMs would affect the $PM_{2.5}$ and PM_{10} emissions. Incorporation of APMs would result in an approximate ~~28~~ 21 percent decrease in $PM_{2.5}$ with control measures incorporated into construction; APMs would reduce an approximate additional ~~46~~ 53 percent of projected PM_{10} emissions over an uncontrolled scenario. Neither uncontrolled nor controlled emission rates from project construction would exceed applicable SDAPCD thresholds, and therefore, the project would not violate any air quality standard or contribute substantially to existing or projected air quality violations.

The vehicle trips and maintenance activities associated with the proposed project would be similar to the level of vehicle trips and maintenance activities prior to construction of the proposed project. Further, ~~it~~ maintenance activities would not involve the use of helicopters.

pp. xiii, 5.4-40 through 5.4-41, and Table 6-1

MM BR-5: Natural Communities; Plant Protection Plan; Tree Protection and Preservation Plan (NCTPP), as described on pages 5.4-40 through 5.4-41 and in Table 6-1 of the Draft IS/MND, have been revised per Comment E-72 to MM BR-5: Natural Communities, Protected Tree, and Plant Protection Plan. Throughout the Final IS/MND, this is no longer referred to as the NCTPP, and is instead referred to contextually as the "Plan." Updates have been made throughout the document wherever applicable (Table 6-1 and Chapter 1.0, "Mitigated Negative Declaration") and to page xiii in the Draft IS/MND Acronym List.

pp. 5.5-15

The Regulatory Setting section does not discuss CPUC preemptive authority over local regulatory agencies with respect to transmission projects. Page 5.5-15 of the Draft IS/MND has been revised to incorporate this condition with respect to local regulations.

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to historic preservation, archaeological, and cultural resources within the project area and vicinity for informational purposes.

pp. 5.7-7

Criterion "b" in Table 5.7-4 on page 5.7-7 of the Draft IS/MND has been revised to "Less Than Significant Impact" to reflect consistency with the analysis and level of determination.

Table 5.7-4 Greenhouse Gases Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	~~☒~~

pp. 5.7-8

Table 5.7-5 and subsequent text on page 5.7-8 of the Draft IS/MND has been revised to account for GHG emissions as part of the removal and replacement activities at the Del Mar Substation.

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO_2	CH_4	N_2O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use[(a)]	73.50	0.00	0.00
Substation Modifications	23.31	0.01	0.00
Total Construction Emissions	~~973.16~~ 977.47	~~0.16~~ 0.17	0.00
Global Warming Potential	1	21	310
CO_2e	~~973.16~~ 996.47	~~3.44~~ 3.57	0.00
Total CO_2e	~~976.6~~ 1,000.04		
Amortized Construction Emissions (Amortized over 30 years)	~~32.55~~ 33.33		
Annual Fugitive SF_6 Emissions[(b)]	1.79		
Total Annual CO_2e	35.12		
SCAQMD Significance Threshold	10,000		
SCAQMD Significance Threshold Exceeded?	No		

Notes:

(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF_6, with a maximum annual leak rate of 0.5 percent.

Key:

CH_4 = methane

Table 5.7-5 Greenhouse Gas Construction Emissions

CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT = metric tons
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District
SDG&E = San Diego Gas and Electric Company
SF_6 = sulfur hexafluoride

Construction activities associated with the removal of the existing oil-filled circuit breaker and replacement with a modern SF_6 breaker is accounted for as part of the various project activities that could generate GHG and contribute to climate change.

[…]

These activities would ~~not generate an~~ represent a substantial increase in GHG emissions when compared to ~~their current levels~~ emissions resulting from existing operation and maintenance activities; therefore, GHG emissions during the proposed project's operation and maintenance activities would be less than significant.

pp. 5.8-7

On page 5.8-7 of the Draft IS/MND, Table 5.8-3 has been updated to correct the names of two schools.

Table 5.8-3 Schools within 0.25 Miles of the Proposed Project

School	Address	Approximate Distance
Fusion Academy Solana Beach	512 Via De La Valle #201, Solana Beach	1,250 ft. west of western terminus, TL674A Reconfiguration
Therapeutic ~~Literacy~~ Learning Center	990 Highland Dr., Solana Beach	100 ft. west of western terminus, TL674A Reconfiguration
Del Mar Hills Elementary School[(a)]	14085 Mango Dr., Del Mar	adjacent TL666 Removal
Del Mar Hills Nursery School	13692 Mango Dr., Del Mar	within 100 ft. west of TL666 Removal
Del Mar Heights Elementary School[(a)]	13555 Boquita Dr., Del Mar	400 ft. west of TL666 Removal
Torrey Pines Montessori Preschool	2586 Carmel Valley Rd., Del Mar	within 100 ft. west of TL666 Removal
Brighter Future Preschool and Childhood Development Center	3422 Tripp Ct, San Diego	300 ft. southwest of TL666 Removal
After School Learning Tree	11525 Sorrento Valley Rd. #A, San Diego	1,000 ft. south of southern terminus, TL666D Removal

Sources: SanGIS 2016; Google 2018; Great Schools 2018
Note:
[(a)] Public Schools
Key:
Dr. = Drive
Rd. = Road

pp. 5.8-18

Page 5.8-18 of the Draft IS/MND has been revised to clarify how the old circuit breaker would be handled and disposed during removal and replacement.

SDG&E or its contractors would remove an oil circuit breaker from the Del Mar Substation and taken to an existing yard. As applicable, parts would be separated to serve as emergency replacement components for other equipment currently in service. The remaining parts would then be sent to a local contracted metal scrap company for disposal. SDG&E's best management practices would be implemented, as applicable, during this work phase.

pp. 5.10-3

Page 5.10-3 of the Draft IS/MND discusses CPUC General Order No. 131-D as a state regulation pertaining to the project. However, because this regulation is relevant within a local regulatory context, it has been moved as an introduction to the Regional and Local Regulatory Setting section in the Final IS/MND.

~~**California Public Utilities Commission General Order No.131-D**~~

~~The California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting[1]. However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).~~

Regional and Local

In accordance with California Public Utilities Commission General Order No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the proposed project; therefore, CPUC projects are exempt from local land use regulations and discretionary permitting.[1] However, General Order No. 131-D, Section XIV.B states: "the public utility shall consult with local agencies regarding land use matters." Accordingly, the CPUC will continue to coordinate with the local agencies regarding the project components as they relate to land use. The public utility, under jurisdiction of the CPUC, is required to obtain any non-discretionary local permits (CPUC 1995).

pp. 5.10-9

Page 5.10-9 of the Draft IS/MND has been revised as follows for consistency with the Final IS/MND's Appendix G.

If unmitigated, potential conflicts with policies presented in the ~~Analysis of Relevant Plans and Policies~~ Land Use and Planning Policy Matrix (Appendix G) could result in significant impacts on the environment.

pp. 5.11-5

The Regulatory Setting of the Draft IS/MND does not discuss CPUC preemptive authority over local regulatory agencies with respect to transmission projects. Page 5.11-5 of the Draft IS/MND has been revised to incorporate this condition with respect to local regulations. Additionally, language has been

inserted clarifying that there are no relevant local regulations pertaining to mineral resources with respect to the proposed project.

Local

The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to mineral resources, this analysis presents local policies, ordinances, and guidelines pertinent to mineral resources within the project area and vicinity for informational purposes.

The relevant planning documents for the city of San Diego and Del Mar do not identify locally important mineral resource recovery sites that would be affected by implementing the proposed project.

pp. 5.12-3

The number and type of sensitive receptors have been updated to reflect work at the Del Mar Substation site as follows:

Within this 1,000-foot sensitive receptor area are ~~three~~ five schools, 14 residences, ~~and~~ eight parks, and one private educational facility.

pp. 5.12-4

On page 5.12-4 of the Draft IS/MND, Solano Santa Fe Elementary School has been removed from Table 5.12-2. It was identified that Solano Santa Fe Elementary School is located more than 1,000 feet from project components, and was erroneously included in the table.

Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
TL674A Reconfiguration		
New 69 kV Underground TL674A	355	Residence
Overhead Line to be Removed 69 kV TL674A	115	Residence
~~Work Area - TL674A (WA-2)~~ TL674A Underground Work Area	~~283~~ 75	~~Solano Santa Fe Elementary School~~ Therapeutic Learning Center
TL666D Removal		
Drop Zone EL666D	107	Residence
Overhead 69 kV TL666D to be removed	Many features overlap	Peñasquitos Lagoon Open Space
Overhead 69 kV TL666D to be removed	Many features overlap	Los Peñasquitos Marsh Nature Preserve
Stringing Site TL666D SS-15	35	Residence
Stringing Site TL666D SS-16	35	Residence
Stringing Site TL666D SS-17	55	Residence

Table 5.12-2 Noise-Sensitive Receptors within 1,000 Feet of Project Components

Project Component/Activity	Nearest Sensitive Receptor (feet)	Receptor
Stringing Site TL666D SS-18	52	Residence
Stringing Site TL666D SS-2	11	Residences
Stringing Site TL666D SS-25	82	Residence
Stringing Site TL674A SS-28	295	Residence
Work Area TL666D (WA-11)	822	Surf and Turf Recreational Park
Work Area TL666D (WA-44)	41	Residence
Work Area TL666D (WA-5)	79	Residence
Work Area TL666D (WA-59)	27	Del Mar Hills Elementary School
Work Area TL666D (WA-67)	175	Del Mar Nursery School
Work Area TL666D (WA-100)	400	Brighter Future Preschool
Work Area TL666D (WA-102)	400	Child Development Center
C510 Conversion		
Existing 12kV Overhead	42	Residence
New 12 kV Underground C510	91	Residence
C738 Conversion		
Underground Work Area C738	445	Shaw Valley Open Space
Del Mar Substation		
Circuit Breaker Removal and Replacement	228	Therapeutic Learning Center
All		
Del Mar Heights Fly Yard	361	Del Mar Heights Elementary School
Pumpkin Patch Staging Yard	121	Fairbanks Ranch Country Club
Pumpkin Patch Staging Yard	123	Carmel Valley Open Space
Pumpkin Patch Staging Yard	145	Residence
Torrey Pines Fly Yard	102	Torrey Pines State Reserve
Torrey Pines Fly Yard	363	Torrey Pines State Beach
Torrey Pines Fly Yard	Features overlap	San Jacinto Wilderness

Key:
kV = kilovolt

pp. 5.12-19

The following sentence has been revised to remove a reference to the number of the most commonly used types of construction equipment presented in Table 5.12-6, because additional equipment have been added to the table that exceed the 20 originally tabulated. Furthermore, text has been inserted that appropriately identifies Del Mar Substation as a work area where the proposed circuit breaker removal and replacement activities would be a temporary source of construction noise.

Equipment that may be used to carry out project construction activities would be similar to equipment used in most public works projects. Table 5.12-6 identifies ~~20 of~~ the most commonly used types of

equipment. Noise levels are measured in decibels at a reference distance of 50 feet from the source. Noise levels are conservatively presented, because the reported outputs assume that no equipment muffling, shielding/baffling, or other means of noise reduction is reflected in the data. Muffling, shielding/baffling, or other noise reduction techniques could reduce the level of noise from its source to receptor.

Construction work would occur at specific work areas, proceeding from one location to the next within one of the four utility corridors where specific construction activities have been identified. Construction would also occur at the Del Mar Substation site associated with circuit breaker removal and replacement. Each work area is considered separate to ensure that noise-generating characteristics are captured in the evaluation of potential construction noise impacts.

pp. 5.12-19, Table 5.12-6

Additional rows have been added to Table 5.12-6 that represent the types of equipment that could be in use at the Del Mar Substation for proposed circuit breaker removal and replacement work. Additional table entries are reflected by the following inserted rows:

Table 5.12-6 Typical Construction Equipment Noise Levels

Equipment Type	Maximum Noise Level at 50 feet (dBA)
Concrete Saw	90
Mower	88
Drill Rig/Truck-Mounted Augur	85
Grader	85
Impact Wrench	85
Jackhammer	85
Vacuum Truck	85
Dump Truck, Flatbed Truck	84
Crane	81
Excavator	81
Rock Drill/Rock-Drilling Equipment	81
Air Compressor	80
Backhoe	80
Forklift	80
Haul/Dump Truck	80
Water Truck	80
Wire-pulling Machine	80
Loader	79
Paver	77
Aerial Bucket Truck	75
Portable Generator	73

Source: SDG&E 2017

pp. 5.12-29

Text on page 5.12-19 of the Draft IS/MND has been revised to incorporate the construction work at Del Mar Substation into the noise analysis.

The ~~three~~ four distinctive groups of activities involve the use of mechanical tools to facilitate (1) construction and removal of overhead power lines and infrastructure; (2) converting and reconfiguring existing overhead circuitry to an underground configuration; (3) removing and replacing a circuit breaker at the Del Mar Substation; and (~~3~~ 4) noise-generating activities associated with vehicle movements, machinery, and from helicopter operations associated with power pole topping and removal in environmentally sensitive areas. These ~~three~~ four groups of construction activities contain adequate detail to evaluate the proposed project's anticipated construction noise impacts.

pp. 5.12-19

Data has been added to Table 5.12-7 to reflect additional construction equipment that would be used at the Del Mar Substation site to facilitate the proposed removal and replacement of a circuit breaker.

Table 5.12-7 Typical Eight-hour Average Noise Levels from Construction Equipment

Equipment	8-hour Noise Levels from Source (dBA)				
	50 ft.	100 ft.	200 ft.	500 ft.	1,000 ft.
Air Compressor	73	67	61	53	46
Aerial Bucket Truck	73	67	61	53	46
Backhoe	76	70	64	56	49
Crane	76	70	64	56	49
Drill Rig/Truck-Mounted Augur	78	72	66	58	51
Grader	75	69	63	55	48
Mower	75	69	63	55	48
Impact Wrench	80	74	68	62	58
Forklift	80	74	68	62	58
Haul/Dump Truck	80	74	68	62	58
Water Truck	80	74	68	62	58
Loader	79	73	67	61	57
Portable Generator	70	64	58	50	43
Rock Drill/Rock-Drilling Equipment	74	68	62	54	47
Backhoe	83	77	71	63	56
Concrete Saw	73	67	61	53	46
Crane	77	71	65	57	50
Excavator	78	72	66	58	51
Jackhammer	75	69	63	55	48
Paver	74	68	62	54	47
Dump Truck, Flatbed Truck	76	70	64	56	49
Vacuum Truck	81	75	69	61	54
Wire Pulling Machine	74	68	62	54	47

Source: FHWA 2006

Table 5.12-7 Typical Eight-hour Average Noise Levels from Construction Equipment

Equipment	8-hour Noise Levels from Source (dBA)				
	50 ft.	100 ft.	200 ft.	500 ft.	1,000 ft.

Note: Noise levels listed above are illustrative and represent the typical types of equipment that would be used for project construction. Values in dark boxes exceed the 75 dBA noise threshold at the stated distance from the source; grey shading indicates noise level is at the reported threshold.

Key:
dBA = A-weighted decibels
ft = feet

pp. 5.12-20 through 5.12-21

Text on pages 5.12-20 through 5.12-21 of the Draft IS/MND has been revised to address construction noise at the Del Mar Substation and anticipated noise effects to nearby receptors.

Circuit Breaker Removal and Replacement, Del Mar Substation

The nearest receptor to the Del Mar Substation is a residential use located upslope approximately 130 feet north from the circuit breaker removal and replacement area. To the east of the substation and downslope is an I-5 off-ramp connecting to Via De La Valle and interstitial open space. To the south is the substation's private driveway from Via De La Valle. To the west is an approximately 30-foot-wide roadway that provides access to the residents atop the hill north of the substation site. On the western side of the roadway are a mix of commercial uses, including the Therapeutic Learning Center about 228 feet southeast of the circuit breaker work area on the substation site. Construction noise would be generated by the use of equipment and machinery, such as jackhammers, loaders, forklifts, and haulers, at the substation site. This equipment would be used to remove an existing circuit breaker and to lay new concrete foundation; to remove, replace and off-haul circuit breaker unit(s); and to create a trench for underground conduit that would connect transmission/distribution lines that would feed into the substation.

Substation work could generate 8-hour average noise levels of up to 80 dBA at 50 feet from the source. Noise levels would attenuate to about 71 dBA at the nearest residential receptor to the north and to approximately 69 dBA at the property line of the Therapeutic Learning Center to the southeast. It is noted that on this site as on others, crews would not operate noisy equipment for entire workdays uninterrupted. Noise levels represent maximum levels from intermittent noise events from various noise-producing sources that are then averaged over an 8-hour period. Although construction noise would be temporary and intermittent, **MM NOI-2** is identified to address receptors 50 or nearer to construction noise sources.

~~Moreover, **MM NOI-2** has been identified for the notification of receptors within 50 feet of construction areas.~~

pp. 5.13-3

Page 5.13-3 of the Draft IS/MND introduces the local regulatory setting of the proposed project, with respect to population and housing. For consistency with other sections, a description of CPUC preemptive authority over local regulatory agencies for transmission projects has been inserted.

The Housing Elements of the City of San Diego and City of Del Mar General Plans were reviewed for policies applicable to the analysis of population and housing impacts of the proposed project (City San Diego 2013). The proposed project does not appear to conflict with any of the General Plan housing policies. The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to population and housing, this analysis presents local policies, ordinances, and guidelines pertinent to population and housing within the project area and vicinity for informational purposes.

pp. 5.14-2

The description of schools within 1,000 feet of the proposed project on page 5.14-2 of the Draft IS/MND has been revised. The schools located within 1,000 feet of the proposed project were identified inconsistently throughout the Draft IS/MND, and some schools located more than 1,000 feet from the proposed project were erroneously included in the environmental setting. The Final IS/MND has corrected these inconsistencies in the text, and on pages 5.12-1 and 5.14-1.

~~Three~~ Five schools are within 1,000 feet of the proposed project's utility corridors: ~~Solano Santa Fe Elementary School,~~ Del Mar Hills Elementary School, Therapeutic Learning Center, Del Mar Nursery School, Brighter Future Preschool and Child Development Center, and Del Mar Heights Elementary School. Del Mar Hills Elementary School, part of the Del Mar Union School District, is located approximately 27 feet from Work Area TL666D (WA-59). ~~Solano Santa Fe Elementary School, part of the Solano Beach School District, would be approximately 283 feet from Work Area TL674A (WA-2).~~ Del Mar Heights Elementary School, part of the Del Mar Union School District, is 361 feet from the Del Mar Heights Fly Yard. Therapeutic Learning Center is located approximately 75 feet west of the Tl674A Underground Work Area, and is across the street from the Del Mar Substation. Del Mar Nursery School is located approximately 175 feet west of the TL666D project component (WA-67). Brighter Future Preschool and Child Development Center is located approximately 400 feet west of the TL666D project component (WA-100 and WA-102).

pp. 5.15-7

Page 5.15-7 of the Draft IS/MND introduces the local regulatory setting of the proposed project, with respect to population and housing. For consistency with other sections, a description of CPUC preemptive authority over local regulatory agencies for transmission projects has been inserted.

County and city plans, including community plans for San Diego County and the Cities of San Diego and Del Mar were reviewed for policies relevant to the proposed project and impacts as defined by the California Environmental Quality Act (CEQA). The CPUC has jurisdiction over the siting and design and regulates construction of investor-owned transmission projects such as the proposed project. Although the CPUC has preemptive authority over local government regulations that may pertain to cultural resources, this analysis presents local policies, ordinances, and guidelines pertinent to recreational resources and facilities within the project area and vicinity for informational purposes.

pp. 5.15-8

Page 5.15-8, Lines 29 to 38 of the Draft IS/MND discuss APM REC-02 and a revision to APM REC-02 per SDG&E's November 20, 2017 response to CPUC's Data Request 01, dated November 9, 2017. For consistency with SDG&E's data response, corrections to APM REC-02 have been incorporated into Section 5.15, "Recreation," and Chapter 6.0, "Mitigation Monitoring and Reporting Plan."

APM REC-02 (Revised by SDG&E in response to Data Request 01 by the CPUC [SDG&E 2017c]): Authorities representing facilities where access restrictions may occur (i.e., the California Department of Parks and Recreation and the City of San Diego) will be contacted and given advance notice of project activities no less than eight weeks prior to construction. SDG&E will also coordinate with the 22nd District Agricultural Association that manages and operates the Del Mar Horse Park no less than eight weeks prior to construction to minimize potential impacts to the facility and its users during construction.

~~**APM REC-02 (Revised),** as revised in response to Data Request 01 by the CPUC (SDG&E 2017c), the applicant would notify authorities and managing agencies of recreational facilities of project activities no less than eight weeks prior to construction to ensure that the facility users are duly informed of service restrictions and or disruptions.~~

pp. 5.16-9

Criterion "c" under Table 5.16-4 (Table 5.16-2 in the Final IS/MND), "Transportation and Traffic Checklist" on page 5.16-9 of the Draft IS/MND has been revised to "Less Than Significant Impact" to reflect consistency with the analysis and level of determination.

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county	☐	☐	☒	☐

Table 5.16-2 Transportation and Traffic Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
congestion management agency for designated roads or highways?				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	~~☒~~
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Revisions to the MMRP

Pages 6-1 through 6-2 of the Draft IS/MND have been revised to reflect that the MMRP is now final.

~~This MMRP is a draft program.~~ The CPUC ~~will~~ has formalized this MMRP for inclusion in the Final IS/MND.~~, prior to construction, to include~~ It includes specific protocols that the applicant's designated environmental monitors and project staff (as described in Section 6.3, "Final Mitigation Monitoring and Reporting Plan") and its contractors shall adhere to prior, during, and after construction. The Final MMRP ~~will include, but not be limited to,~~ includes protocols and timelines for the following topics. The list below is not exhaustive:

[…]

A Final MMRP ~~will be~~ was prepared for the Final IS/MND that incorporates ~~any~~ the changes to the proposed project, IS/MND text, and ~~or~~ mitigation measures that ~~are~~ were made ~~as a result of~~ during public review of the Draft IS/MND and further consideration of the proposed projects by the CPUC.

A revision has been made to the "Monitoring/Reporting Action" column Table 6-1 on page 6-15 of the Draft IS/MND, for APM GEO-1. The Monitoring/Reporting Action has been revised as follows, to account for potential geological monitoring needs based on a subsequent final geotechnical investigation.

SDG&E submits final geotechnical study to CPUC prior to, and in support of, issuance of any permits necessary for project construction. Relevant geotechnical recommendations would be incorporated into final project design as feasible. If identified as necessary based on the final geotechnical study, a

geological monitor will monitor project activities occurring in geologically sensitive areas within Torrey Pines State Natural Reserve Extension.

Furthermore, multiple revisions have been made to Table 6-1 in Chapter 6.0, "Mitigation Monitoring and Reporting Plan." The column titled "Responsible Agency" in the Draft IS/MND has been re-titled "Responsible Agencies and Parties," and additional responsible agencies and parties have been inserted into that column where appropriate. Furthermore, when mitigation measures or other contents related to the MMRP have been revised in response to public comments (see Chapter 7.0, "Response to Comments"), those revisions have also been incorporated into Table 6-1.

Revisions to the Draft IS/MND to Update to the Final IS/MND

Throughout the document, revisions have been made to reflect that the IS/MND document is the Final IS/MND. For example, footers have been changed to show "Final IS/MND" rather than "Draft IS/MND." Language that reflected the Final IS/MND would be prepared has been removed to reflect that the Final IS/MND has been prepared.

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