

April 2, 2015

California Public Utilities Commission  
RE: SOCRE Project  
c/o Ecology and Environment, Inc.  
505 Sansome Street, Suite 300  
San Francisco, CA 94111

Also via email at [socre.ceqa@ene.com](mailto:socre.ceqa@ene.com)

RE: SUPPORT South Orange County Reliability Enhancement, as Proposed by SDG&E

As a South Orange County business owner, having a reliable energy infrastructure is critical to the livelihood of my company, customers, employees and family.

I was greatly disappointed to see that the Draft EIR for the South Orange County Reliability Enhancement project did not identify SDG&E's plan for a new substation on the site of its old substation in San Juan Capistrano as an alternative in the EIR. This seemed like the best and least impactful solution.

The Alternatives favored in the plan were bleak for our community. Blackouts, or load-shedding, should not be considered to be a viable solution. Beyond the economic implications of a blackout, public safety is at risk. Our residents and visitors deserve better treatment.

Reconductoring does not address redundancy and should also not be considered. Finally, Southern California Edison Alternatives will add unnecessary delays and result in more permanent impacts – we can no longer wait for redundancy and reliability.

Please reconsider SDG&E's proposal. Temporary impacts from construction are a welcome tradeoff to finally have a safe and redundant energy infrastructure. I implore you: do not adopt any of the current Alternatives identified in the EIR and approve SDG&E's project as originally proposed.

Sincerely,



William A. Ewing

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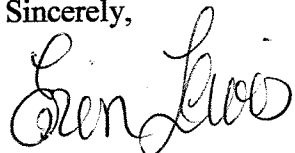
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ERIN LEWIS, SAN CLEMENTE

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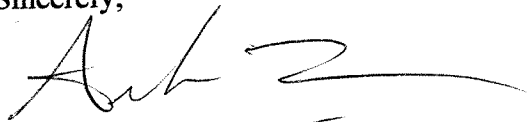
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We especially are concerned about the "No Project" Alternative that considers blackouts to be a viable solution. We simply cannot fathom any alternative that puts public health and safety at risk.

SDG&E presented the right solution to keeping the lights on in Orange County. Please approve this project and reject the staff recommendations.

Sincerely,

  
Arlan Flores  
San Clemente

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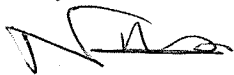
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Sincerely,



Norma Hernandez  
San Clemente



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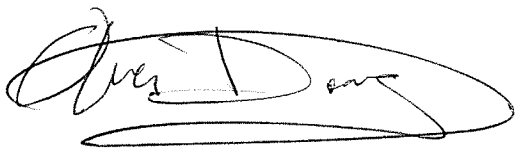
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ANTERO DIAZ  
SAN CLEMENTE

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William Lhommedieu

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Sincerely,

A handwritten signature in cursive script that reads "Domingo Flores". The signature is written in dark ink and is positioned above the printed name.

Domingo Flores  
San Clemente

April 2, 2015

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Sincerely,

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Amelia Diaz

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Esmeralda Diaz  
San Clemente

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Sincerely,

Peggy Vance  
San Clemente, Ca

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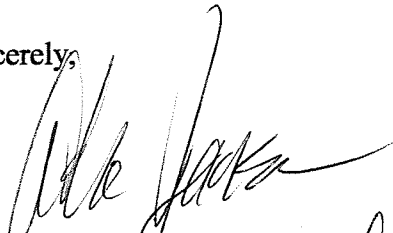
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Sincerely,

  
Alan Jackson Consulting  
San Juan Capistrano, CA

21 de marzo 2015

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505 Sansome Street, Suite 300  
San Francisco, CA 94111

RE: APOYO – Proyecto de San Diego Gas & Electric (SDG&E), Mejora de Confiabilidad al Sur del Condado de Orange (SOCRE)

Por favor, apruebe el SOCRE proyecto de SDG&E propuesto, que está diseñado para proporcionar una confiabilidad eléctrica al Sur del Condado de Orange. Este proyecto será construido en la propiedad y las servidumbres existentes de SDG&E. Debido a que no se requiere una nueva propiedad, los impactos ambientales serán probablemente mucho menos que los efectos desconocidos de la clasificación y la construcción de una nueva subestación desde cero en una nueva ubicación.

Las otras dos alternativas bajo consideración – cambio de conductores de las líneas de 138 kilovoltios o la alternativa de “no proyecto” – no cumplen el propósito y la necesidad de un sistema de transmisión eléctrica fiable que tiene redundancias incorporadas para protegernos de los cortes de energía.

Electricidad fiable es importante para nosotros en el Sur del Condado de Orange y le animamos a que apruebe el proyecto SOCRE de SDG&E propuesto para garantizar energía segura y confiable para nuestras futuras necesidades de energía.

Sinceramente,





## **INTRODUCTION**

San Diego Gas & Electric Company (SDG&E) filed a Proponent's Environmental Assessment (PEA) as part of its application for a Certificate of Public Convenience and Necessity (CPCN) for the South Orange County Reliability Enhancement Project (Proposed Project) to the California Public Utilities Commission (CPUC) on May 18, 2012. Subsequent to filing the PEA and publication of the Draft Environmental Impact Report (EIR) by the CPUC, minor Proposed Project refinements (transmission line, distribution line, and Talega substation) were made to reduce the total number of structures and reconfigure the layout at Talega Hub to eliminate underground transmission and cable poles. These changes were the result of ongoing engineering, updated construction planning/sequencing, new design specifications (e.g., an updated Geotechnical investigations), and an effort to reduce adverse environmental effects (impacts). The updated Geotechnical Investigation Report has been included as Exhibit 1.

## **OVERVIEW**

These minor changes are described in more detail under the Minor Proposed Project Design Refinements section of this attachment and summarized below for each Proposed Project component.

Although the precise number of structures to be installed may be further refined during final engineering, the minor Proposed Project refinements noted thus far result in the estimated quantity of transmission line structures to be reduced from 82 to 71 structures (47 230kV, 17 138kV, and 7 69kV). Figure 1 represents all of the minor Proposed Project revisions, and previous (Draft EIR) design elements.

### **Minor 230kV Transmission Line Refinements**

- **Structure Removals**
  - One 230kV structure was removed from the Proposed Project design.
- **Structure Relocations**
  - Minor shifts of 230 kilovolt (kV) structures occurred throughout the design.
  - Relocations were typically for constructability of foundations and grading.
  - Transmission structures were relocated as part of the Orange County La Pata Avenue Gap Closure and Camino Del Rio Extension Project to allow construction of the road (SDG&E Advice Letter 2603-E).
  - Structure relocations maintain the original transmission alignment.
- **Structure Heights**
  - A few 230kV structure heights decreased in height
  - Due to clearance issues or EMF mitigation, five structures are taller than the maximum height identified in the Draft EIR.
  - The remaining structures are still within specified structure height ranges at a minor average increase of approximately six feet.

- Transfer of existing fiber communication
  - Fiber communication will be transferred from an existing 138kV pole to structure 38. To accommodate the fiber relocation a short trench from the existing structure to the new structure will be required.

**Minor 138kV Transmission Line Refinements Near San Juan Capistrano Substation**

- Structure Relocations
  - Some relocation of 138kV structures were made for constructability of foundations. New locations remain within SDG&E right-of-way.
- Structure Heights
  - Some structure heights changed, but are still within specified height range in the Draft EIR.
- Underground Trench Reduction
  - 138kV underground was reduced by approximately 420 feet by shifting structures 1a and 2a east.

**Minor 138kV and 69kV Transmission Line Refinements from Talega Hub into Talega Substation**

- Structure Relocations
  - Structure locations were relocated to reconfigure Talega Hub and all underground work at the hub was removed.
- Structure Removals
  - Removal of two 69kV cable poles from the Proposed Project design.
  - Removal of nine 138kV cable poles from the Proposed Project design.
- Structure Additions
  - Addition of four 138kV overhead poles.
- Structure Heights
  - Some structure heights changed, but are still within the specified height range as identified in the Draft EIR
- Underground Trench Reduction
  - Removal of approximately 410 feet of 69kV underground.
- Overall Changes
  - Net reduction of five 138kV structures.
- Removal of approximately 1,870 feet of 138kV underground.

Exhibit 2, Updated Structure Table, details the revised structure heights included as part of the minor Proposed Project refinement process. Table 1, Summary of Impact Area, provides a summary of the estimated area of disturbance for the Draft EIR Proposed Project.

**Table 1: Summary of Impact Area**

<b>Impact Type</b>	<b>Draft EIR Impact Area</b>	<b>Revised Impact Area</b>	<b>Delta</b>
Temporary Impacts	23.36	30.88	(7.52)
Permanent Impacts	20.46	16.39	4.07

## **MINOR PROPOSED PROJECT DESIGN REFINEMENTS**

Minor Proposed Project Refinements are described in detail below for each segment of the Proposed Project Alignment.

### **Segment 1a**

Proposed 138kV cable poles 1a and 2a have been shifted approximately 200 feet east to ensure constructability and avoid additional work within the 138kV system. This reduced the length of the proposed 138kV underground by approximately 420 feet (refer to Figure 1). Other minor structure relocations were made along Segment 1a to ensure constructability. All relocated structures on Segment 1a remain in existing SDG&E right-of-way (refer to Figure 1 and Exhibit 2).

The 138kV and 12kV Jack-and-Bore increased in length from approximately 130 feet to approximately 275 feet. SDG&E increased the length of the jack and bore distance in order to relocate the construction work further away from the nearby residences and to allow for proper construction clearances. The boring now ends west of Calle San Diego (refer to Figure 1).

### **Segment 1b**

230kV structures 1, 2, and 3 were shifted based on refined engineering for the 230kV transmission line entrance into the San Juan Capistrano Substation (refer to Figure 1). The remaining structures were shifted slightly along the alignment to ensure constructability of foundations and grading. All relocated structures on Segment 1b remain in existing SDG&E right-of-way.

The proposed structures on either side of Highway 74 were changed from tangent structures to deadend structures.

### **Segment 2**

Proposed 138kV cable pole 8a has been removed from the Proposed Project based on revised 230kV underground design which no longer requires the relocation of this structure (refer to Exhibit 2 and Figure 1).

Proposed 230kV cable poles 16 and 17 were shifted, to ensure constructability along Segment 2.

### **Segment 3**

Proposed Structure 20 was removed from the Proposed Project design as it was no longer needed to maintain ground clearances. Some proposed 230kV structures were shifted along the alignment to refine the design to ensure constructability and grading. Some structures were also

shifted up to accommodate the County's La Pata Road extension project (refer to Figure 1; see also SDG&E Advice Letter 2603-E).

Existing underground communication fiber currently travels from an existing 138kV structure to the Pico Substation. This fiber communication will be transferred from the existing structure to the new structure PEA 38. This involves a short trench from the new structure to the existing structure (approximately 40 feet).

#### **Segment 4**

The Talega Hub design was reconfigured to eliminate all cable poles and underground cable. This revision eliminated approximately 1,370 feet of 138kV underground and 410 feet of 69kV underground. The revision also reduced the number of 138kV circuits terminating into Talega Substation by one. Structure 49 no longer needs to be replaced based upon additional engineering analysis. This results in a total reduction of eight new transmission structures within Segment 4 (33 reduced to 25).

The TL695 alignment was revised to avoid areas of unstable soils and potential landslides. No other Proposed Project elements were affected by these soil conditions.

A new communication cable pole has been added north of Talega Substation to accommodate communication requirements (refer to Figure 1). A new distribution pole replacement was added to account for anticipated structure loading on the existing structure. The replacement distribution structure is located south of the Talega Hub, between Structures 1b and 2b.

#### **12kV Segment A: Getaways (West Side, Underground)**

The two circuits going North on Camino Capistrano (314, 799) will ascend on two separate cable poles that may be made out of existing overhead structures or new structures if the existing distribution structures cannot meet loading requirements. The underground circuits going west along with the transmission lines (313, 195) will ascend on a separate distribution only cable pole.

#### **12kV Segment B: Circuits 196, 197, and 315 (New Underground Conduit)**

SDG&E is proposing to move the 12kV distribution lines to an existing access road located along the southern border of Junipero Serra Park (refer to Figure 1, page 2). This will eliminate extensive grading and tree removal to accommodate the relocation of the 12kV distribution lines on 12kV Segment B to the northern portion of the park, where SDG&E has existing underground ROW. Construction of the 12kV distribution lines in the southern border location (existing paved access road) would reduce the adverse impacts associated with distribution line Segment B. SDG&E will work with the City of San Juan Capistrano to obtain underground rights along the existing paved access road along the southern border of Junipero Serra Park.

### **12kV Segment K: La Pata Avenue Existing Underground Conduit**

12kV Segment K has already been constructed due to the needs of the Orange County La Pata road widening project. The ultimate configuration has already been established and no further work is required.

### **12kV Segment L: Talega Substation Entry Road (Overhead)**

12kV Segment L has already been constructed due to the needs of the Orange County La Pata road widening project. The ultimate configuration has already been established and no further work is required.

### **San Juan Capistrano Substation**

No revisions to the San Juan Capistrano Substation design have occurred.

### **Talega Substation**

The construction of TL13835 into Talega Substation as a new tie line position has been eliminated from the Proposed Project design. Therefore, the approximately 500-foot trench inside the substation and associated 138kV line re-arrangement will not be required. Structures 21a and 22a (both located within the Talega Substation fence line) have been removed from the Proposed Project design.

### **Construction Methods**

SDG&E has made minor refinements to certain construction methods with the intent of reducing previously identified adverse environmental effects. Specifically, SDG&E has completed some draft traffic control plans to reduce impacts to traffic and circulation, and has researched potential soil stabilization methods to reduce emissions of fugitive dust. Discussed in detail below are these refined construction methods.

#### **Draft Traffic Control and Underground Construction Plans**

SDG&E's engineering and construction contractors prepared draft traffic control and construction sequencing plans for roadways affected by construction of underground facilities where potentially significant impacts were identified by the Draft EIR. The draft traffic control and construction sequencing plans were prepared to reduce specific impacts identified in the Draft EIR, as further discussed below.

As shown in Exhibit 3, SDG&E's engineering and construction contractor for Segment 1a, prepared draft traffic control and construction sequencing plan for undergrounding of 138 and 12kV lines within Camino Capistrano. The draft Camino Capistrano traffic control plan (TCP) is designed to ensure that there would be no full closure of Camino Capistrano, and maintain three lanes of travel during underground construction within the road. As further discussed below under the "Environmental Impacts from Minor Proposed Project Design Refinements" section of this document, the draft Camino Capistrano TCP would reduce significant,

unavoidable impacts to Traffic Circulation and Cumulative impacts to a level less than significant.

As shown in Exhibit 3, SDG&E's design contractor for Segment B prepared a draft construction sequencing plan for construction of new 230kV underground within Via Pamplona. The Draft Via Pamplona TCP is designed to ensure that full closure of Via Pamplona would not be required during construction of the underground lines. As further discussed below under the "Environmental Impacts from Minor Proposed Project Design Refinements" section of this document, the draft Via Pamplona TCP would reduce significant, unavoidable impacts to Traffic circulation to a level less than significant.

### Soil Stabilizers

Fugitive dust emissions during the construction of the Proposed Project are expected to result from site grading or excavation activities, travel on unpaved access roads, wind erosion of areas disturbed by construction activities and soil/aggregate loading and unloading operations. To minimize the contribution of fugitive dust emissions (including PM2.5 and PM10) to the Proposed Project's overall air emissions, SDG&E will incorporate the use of soil binders during construction.

Non-toxic, non-hazardous, biodegradable acrylic- or vinyl-based co-polymer soil stabilizer (e.g., Envirotac, Rhino Snot, Gorilla Snot) will be applied to unpaved dirt access roads, equipment and material staging areas, tower pads, temporary stringing sites and substation yard areas prior to construction activities (whenever feasible). When applied for dust control, co-polymer typically is diluted with eight parts water and applied by spray boom from a water truck or by hand from a hose. This soil stabilizer application will be targeted for a 12 to 16 month durability rating, and reapplied if needed due to construction activity extending beyond the specified application duration.

On hard, compacted dirt surfaces initial scarification may be required to achieve penetration of the co-polymer to a depth within the soil profile for the 12 to 16 month durability rating (e.g., ½ to 1 inch deep). During soil scarification water will be utilized for dust control. After the co-polymer is applied to the soil, it will be allowed to dry (cure) for 24 to 48 hours before construction activity/traffic will begin. With the properly applied and cured co-polymer base on Proposed Project dirt construction areas, SDG&E anticipates a significant suppression of fugitive dust emissions as well as a reduction in water applications required for dust control throughout the Proposed Project work areas.

### Corona Noise Modeling

The South Orange County Reliability Enhancement Transmission Line Project Audible Noise Analysis Report, Revision 1 (refer to Exhibit 4), an audible noise assessment, was completed for the Proposed Project. It takes into account the noise due to corona effects for the Capistrano - Talega 230kV overhead line segments. This work includes noise calculations for multiple locations along the following overhead line segments.



Audible noise due to transmission line conductor corona was analyzed at three locations along the line. As shown in the report, all calculated values outside of the right-of-way fall below the recommended 45 dBA limit for environmental impact of exposure to audible noise per the Draft EIR. Therefore, noise monitoring post construction is not required.

## **ENVIRONMENTAL IMPACTS FROM MINOR PROPOSED PROJECT DESIGN REFINEMENTS**

The minor Proposed Project design revisions will not result in any new environmental impacts not disclosed within the Draft EIR, will not substantially increase the severity of any impacts disclosed within the Draft EIR, will not require any new mitigation measures to ensure mitigable impacts are less than significant, will not require any new permits or agency approval/consultation processes, and will not result in any impacts outside of the Proposed Project study area, as described in the Draft EIR. The minor Proposed Project design revisions are anticipated to result in less impact to certain resource areas, as discussed below.

### **Traffic and Transportation**

The Draft EIR identified the following three specific temporary, significant impacts relating to traffic and transportation:

1. Impacts to roadway segment operations (level of service [LOS]) from full closure of three streets during underground construction (Calle San Diego, Camino Capistrano, and Via Pamplona);
2. Impacts to roadway segment operation (LOS) from partial closure of Camino Capistrano during underground construction of Segment 1a; and
3. Cumulative impacts to roadway segment operation (LOS) from partial closure of Camino Capistrano during underground construction of Segment 1a.

Impact No. 1 listed above is based on the worst case assumption that full closure of Calle San Diego, Camino Capistrano, and Via Pamplona could be required during construction of underground facilities (transmission or distribution lines). However, SDG&E has confirmed with its contractors that full closure of these roadways would not be required during underground construction. Pursuant to the revised Segment 1a design above, installation of underground 138kV and 12kV lines by jack-and-bore technique would now bypass Calle San Diego, thus removing the need to trench through Calle San Diego. With no trenching within Calle San Diego, no road closures would be required and impacts would therefore be reduced to less than significant. Pursuant to Exhibit 3, construction of underground lines within Camino Capistrano can be completed without full road closure. Therefore, impacts along Camino Capistrano would be reduced to less than significant. Finally, as shown in Exhibit 3, construction of underground facilities within Via Pamplona can also be completed without full road closure. Therefore, traffic impacts to Via Pamplona would also be reduced to less than significant.

Impact No. 2 listed above is based upon the reduction in traffic circulation (LOS) that would result from partial closure of Camino Capistrano during underground construction of Segment 1a. This impact results from Camino Capistrano's roadway capacity being reduced (from 18,750

to 12,500), resulting in LOS reduction to LOS level F (current LOS on Camino Capistrano is Level D). This reduction in LOS is due to partial road closure during construction (Draft EIR at pg. 4.15-19). However, by utilizing the Draft Camino Capistrano TCP (Exhibit B), three lanes of travel on Camino Capistrano can be maintained during construction within Camino Capistrano. Therefore, impacts would be reduced to less than significant as the roadway capacity on Camino Capistrano would not be reduced, and the corresponding reduction in road segment operation would not occur, and roadway LOS would not exceed acceptable levels (LOS D).

Impact No. 3 above is also based upon the reduction of traffic circulation on Camino Capistrano from temporary lane closures during underground construction. Therefore, as explained above, impacts can be reduced to less than significant during underground construction through implementation of the draft Camino Capistrano TCP, which would allow for retention of three lanes of travel during construction.

### **Biological Resources**

While the minor design revisions have resulted in the addition and subtraction of work areas (and corresponding temporary and permanent disturbance of natural vegetation), the impacts resulting to sensitive habitat and species would not differ from those impacts identified in the Draft EIR. Specifically, the vegetation impacts following application of the minor design revision would include temporary and permanent impacts to coastal sage scrub (CSS), disturbed coastal sage scrub (DCSS), non-native grassland (NNG)/ruderal vegetation, and various non-sensitive land covers such as landscaping (ornamental vegetation), bare ground, and disturbed habitat. Table 3, Impacts by Vegetation Type, compares impacts to sensitive and non-sensitive vegetation communities from the Draft EIR and from the Proposed Project with minor design revisions. No new or substantially more severe impacts to biological resources would occur, and no new mitigation measures would be required to ensure that impacts to biological resources would be less than significant.

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**Table 2: Impacts by Vegetation Type**

Vegetation Community	Draft EIR Design		SDG&E Refined Design	
	Permanent	Temporary	Permanent	Temporary
Coastal Sage Scrub	1.59	2.01	2.1	1.87
Southern Willow Scrub	0	0	0	0
Coastal Freshwater Marsh	0	0	0	0
Riparian Scrub	0	0	0	0
Non-Native Grassland (Ruderal) <sup>1</sup>	2.42	8.42	2.57	8.35
Developed <sup>2</sup>	10.05	4.84	3.49	12.89
Dirt Road/Bare Ground <sup>2</sup>	1.23	1.41	2.95	0.82
Disturbed <sup>2</sup>	2.83	5.30	3.21	3.28
Ornamental <sup>2</sup>	2.34	1.16	2.07	3.67
<i>Subtotals</i>	20.46	23.14	16.39	30.88
<b>Notes:</b> <sup>1</sup> Note that some of the ruderal vegetation impacts are within polygons mapped by the United States Fish and Wildlife Service (USFWS) as “Potential Development” (See Figure 2) and that these areas should not be reclassified as simply NNG, but should be considered impacts to non-sensitive ruderal vegetation that has been planned for potential future development by the applicable resource agency. <sup>2</sup> The Draft EIR (Table 4.4-6) did not list impact acreages for non-sensitive vegetation, therefore impact acreages are listed from the PEA for comparison to the revised Proposed Project impact areas.				

## **Cultural Resources**

The minor design changes described in the preceding sections do not change the cultural resource conclusions reached in the Draft EIR. No known additional cultural resources will be impacted by the minor design revisions as none of the new or relocated structures occur within the boundaries of known cultural sites. No new impacts would occur, existing impacts would not be substantially more severe, and no additional mitigation would be required to ensure that impacts are less than significant.

## **Air Quality and Greenhouse Gases**

The minor design revisions as described within this document would be expected to result in a reduction in emissions of criteria pollutants. Specifically, the use of soil stabilizers would reduce project-wide emissions of particulate matter associated with fugitive dust. Particulate matter reductions with water-based acrylic polymers depend upon many pre-application variables (e.g., application rate, volume, depth of penetration, curing time before use, underlying soil composition and degree of compaction, etc.) as well as post-application variables (e.g., wind speed, equipment weight and travel frequency, etc.) However, manufacturers like Envirotach have completed bench-scale studies and field tests that have shown up to 90 percent effectiveness at reducing PM<sub>10</sub> emissions ([envirotac.com/dust-control-soil-stabilization-product-info/dust-control-test-results-summary-envirotac-ii/](http://envirotac.com/dust-control-soil-stabilization-product-info/dust-control-test-results-summary-envirotac-ii/)) and vinyl-based polymers have also been

shown to achieve the same efficacy of erosion reduction ([fesss.org/download/arsiv/VY0P94RP.pdf](https://fesss.org/download/arsiv/VY0P94RP.pdf)) compared to water application for dust control. When properly applied, both acrylic- and vinyl-based co-polymer soil binders can reduce emissions of fugitive dust by up to 90 percent as compared to areas without the application of soils binders. An added benefit of the application of soil binders is also a reduction in the number of water trucks (which would further reduce emissions) required which results not only results in less water trucks on-site, but also the potential reduction of water use, specifically on access roads. Water trucks may only be necessary in areas where there is active excavation.

In addition, the minor design revisions include a reduction of new structures, including 11 fewer overhead structures and approximately 2,700 feet less underground facilities being installed. It is anticipated that this reduced scope would result in fewer emissions of criteria pollutants when compared to the emission disclosed in the Draft EIR, mainly due to the reduced use of construction equipment, truck and worker trips, and overall soil disturbance. Air emissions would still be anticipated to exceed local and regional significance thresholds, therefore impacts to air quality would be substantially the same as those disclosed in the Draft EIR. No new mitigation would be required.

### **Public Services and Utilities**

As stated above, the utilization of soil stabilizers is anticipated to decrease the amount of water used during dust control for Proposed Project construction. Any decrease in water use would decrease potential impacts to water supply (Draft EIR Impact PS-3 [page 4.13-12]). In addition, the use of soil stabilizers would be considered a measure in compliance with Draft EIR Mitigation Measure PS-1, which includes a requirement for SDG&E to make reasonable attempts to reduce overall water use.

## FIGURES

## **EXHIBIT 1**

### **Geotechnical Investigation Report**

## **EXHIBIT 2**

### **Updated Structure Table**

### **EXHIBIT 3**

#### **Draft Traffic Control and Construction Sequencing Plans**

## **EXHIBIT 4**

### **Audible Noise Analysis Report**



Figure 1:  
SOCRE Project  
Design Revisions

Legend

- LiDAR Structure
- Distribution Cable Pole
- Proposed Structures
- PEA/DEIR Pole Locations

Vaults

12kV-UG

69kV-OH

138kV-OH

138kV-UG

230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

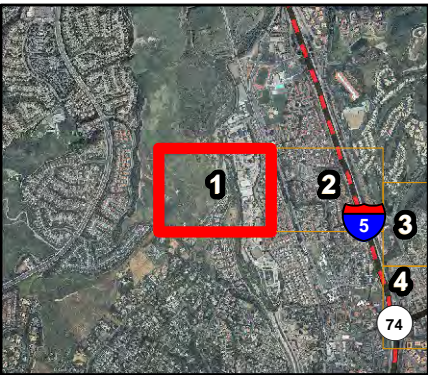
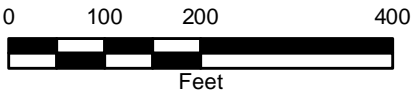
Permanent

Temporary

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Distribution Lines

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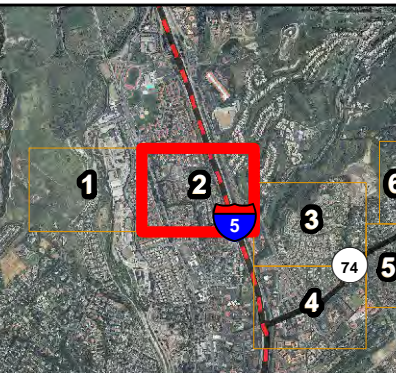
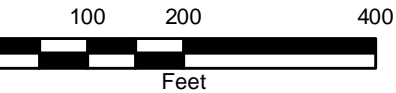
Permanent

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138kV-UG

230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

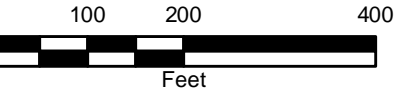
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Figure 1:  
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- Legend**
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- 138kV-UG
- 230kV-OH
- 230-UG
- Distribution Lines
- LaPata Road Grading

**Project Modifications**  
Same as PEA/DEIR Design

- Temporary
- Permanent

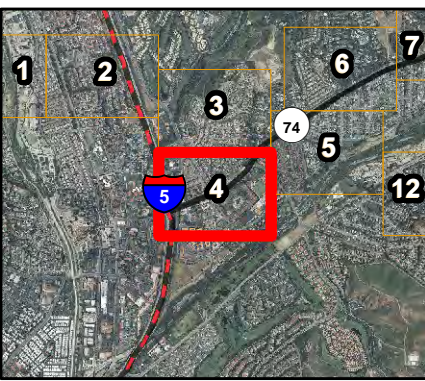
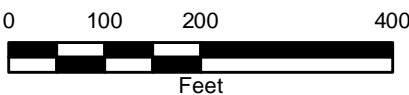
**New Impacts**

- Permanent
- Temporary

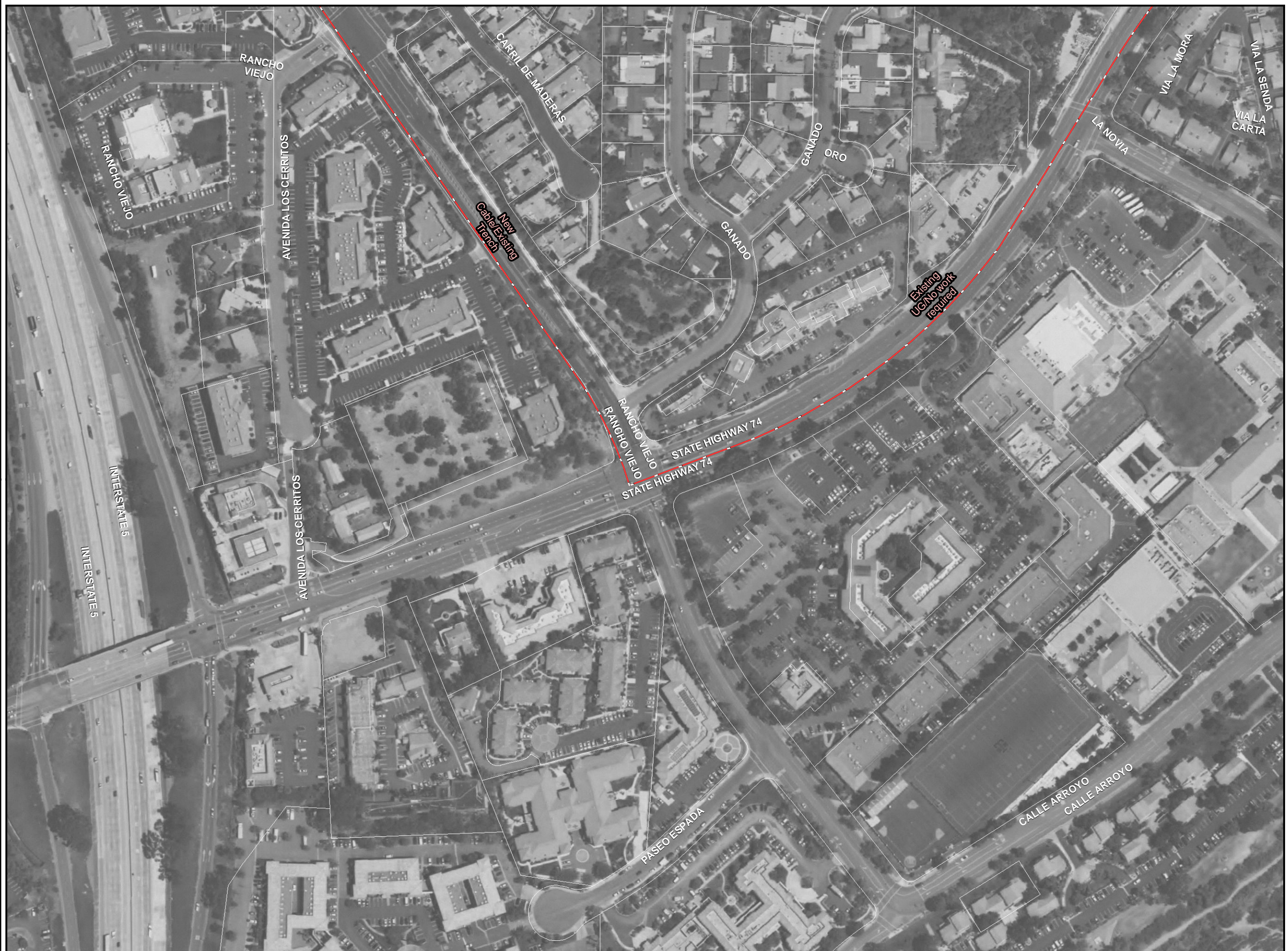
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### Legend

-  Vaults  
 12kV-UG  
 69kV-OH  
 138kV-OH  
 138kV-UG  
 230kV-OH  
 230-UG

— Distribution Lines  
— LaPata Road Gra

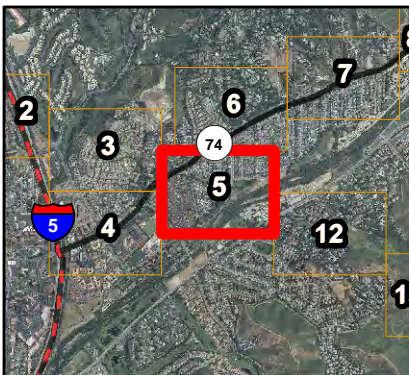
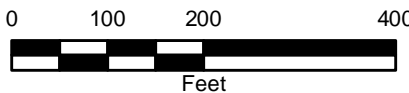
## Same as PEA/DEIR Design

- Temporary
  - Permanent

Permanent  
Temporary

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Figure 1:  
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- 69kV-OH
- 138kV-OH
- 138kV-UG
- 230kV-OH
- 230-UG
- Distribution Lines
- LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

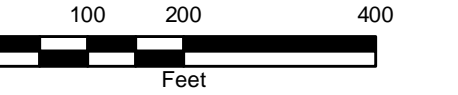
New Impacts

- Permanent
- Temporary

PEA/DEIR - Impact Removed

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Figure 1:  
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- 230kV-OH
- 230-UG
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Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

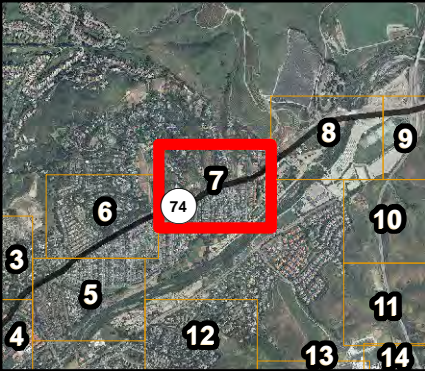
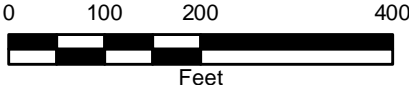
New Impacts

- Permanent
- Temporary

PEA/DEIR - Impact Removed

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Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

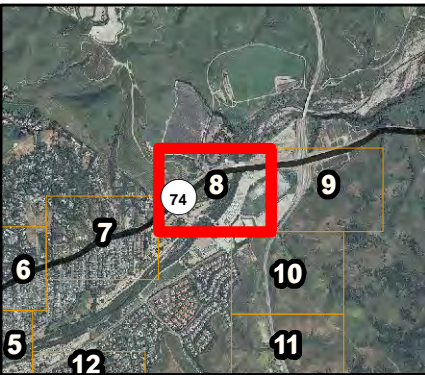
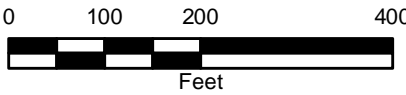
New Impacts

- Permanent
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Same as PEA/DEIR Design

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Permanent

New Impacts

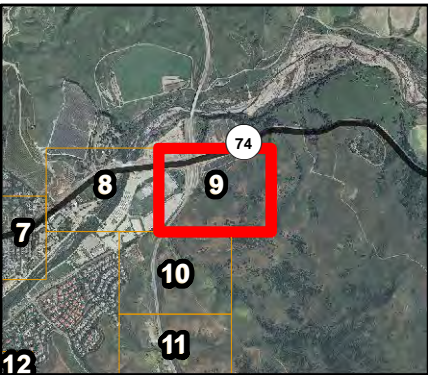
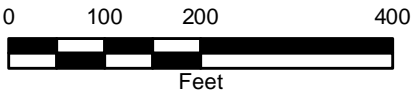
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Figure 1:  
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Permanent

New Impacts

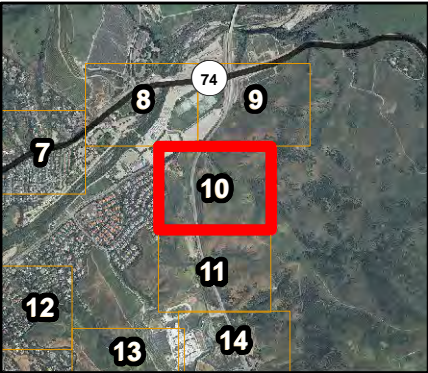
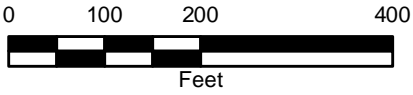
Permanent

Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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Figure 1:  
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Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

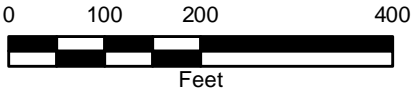
Permanent

Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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Figure 1:  
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**Project Modifications**

**Same as PEA/DEIR Design**

- Temporary
- Permanent

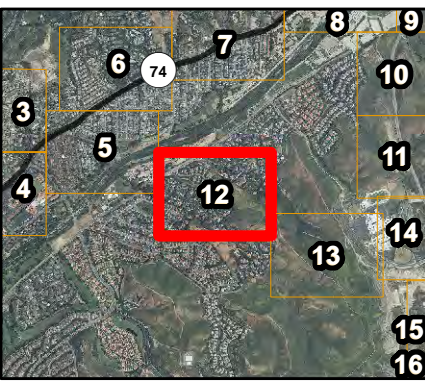
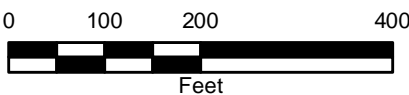
**New Impacts**

- Permanent
- Temporary

**PEA/DEIR - Impact Removed**

- No Longer an Impact

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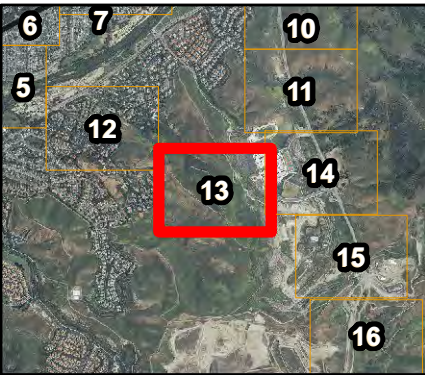
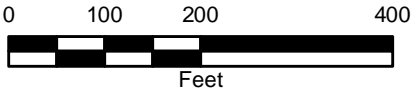


Figure 1:  
SOCRE Project  
Design Revisions

Legend

- LiDAR Structure
  - Distribution Cable Pole
  - Proposed Structures
  - PEA/DEIR Pole Locations
  - Vaults
  - 12kV-UG
  - 69kV-OH
  - 138kV-OH
  - 138kV-UG
  - 230kV-OH
  - 230-UG
  - Distribution Lines
  - LaPata Road Grading
- Project Modifications**
- Same as PEA/DEIR Design**
- Temporary
  - Permanent
- New Impacts**
- Permanent
  - Temporary
- PEA/DEIR - Impact Removed**
- No Longer an Impact

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Figure 1:  
SOCRE Project  
Design Revisions

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- 230-UG
- Distribution Lines
- LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

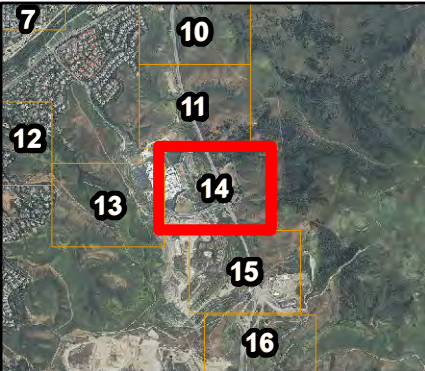
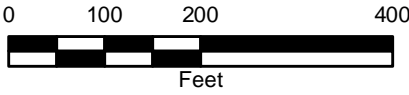
New Impacts

- Permanent
- Temporary

PEA/DEIR - Impact Removed

- No Longer an Impact

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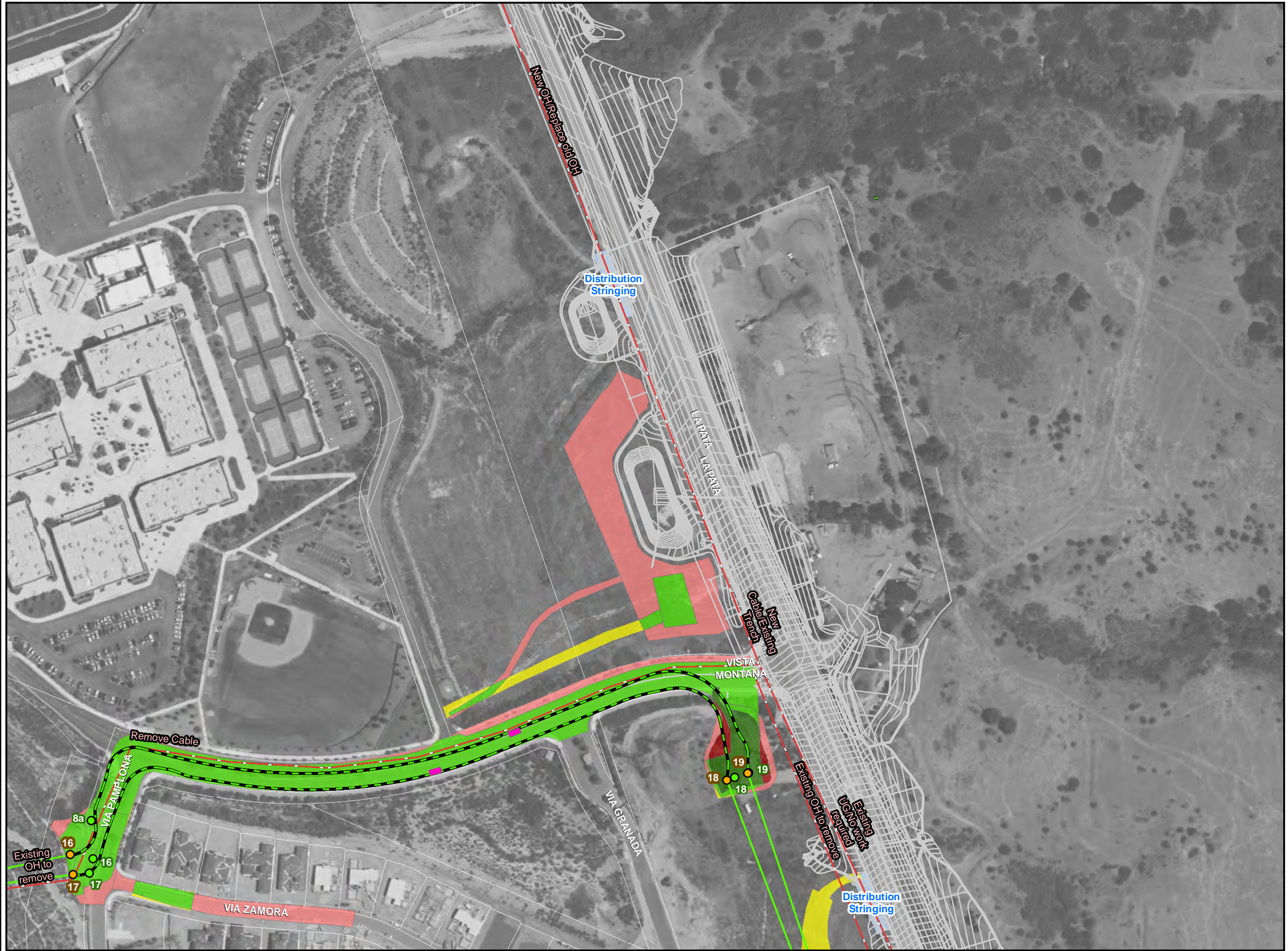




Figure 1:  
SOCRE Project  
Design Revisions

**Legend**

- LiDAR Structure
- Distribution Cable Pole
- Proposed Structures
- PEA/DEIR Pole Locations

Vaults

- 12kV-UG
- 69kV-OH
- 138kV-OH
- 138kV-UG
- 230kV-OH
- 230-UG

Distribution Lines

LaPata Road Grading

**Project Modifications**

**Same as PEA/DEIR Design**

- Temporary
- Permanent

**New Impacts**

- Permanent
- Temporary

**PEA/DEIR - Impact Removed**

- No Longer an Impact

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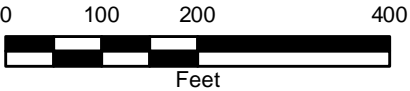




Figure 1:  
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Vaults

12kV-UG

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230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

Permanent

Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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0 100 200 400  
Feet



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Figure 1:  
SOCRE Project  
Design Revisions

Legend

- LiDAR Structure
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Vaults

12kV-UG

69kV-OH

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138kV-UG

230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

Permanent

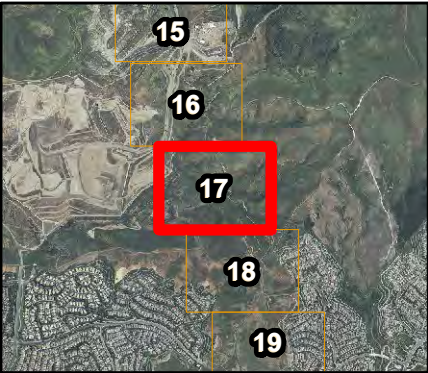
Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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0 100 200 400  
Feet



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Figure 1:  
SOCRE Project  
Design Revisions

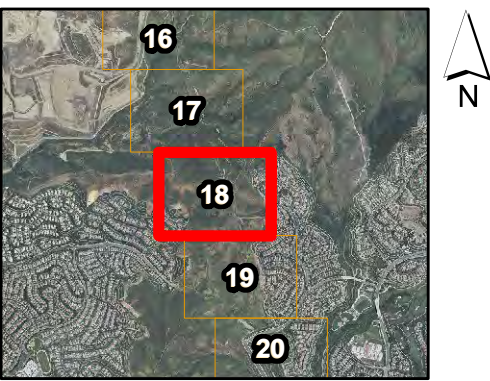
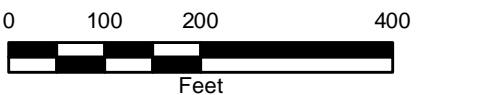
Legend

- LiDAR Structure
- Distribution Cable Pole
- Proposed Structures
- PEA/DEIR Pole Locations
- Vaults
- 12kV-UG
- 69kV-OH
- 138kV-OH
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Project Modifications

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- Temporary
  - Permanent
- New Impacts
- Permanent
  - Temporary
- PEA/DEIR - Impact Removed
- No Longer an Impact

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SOCRE - 15-0002 Current Design vs PEA\_2400scale\_2015\_04\_10\_rev4.Mxd (mtvaneck)



Figure 1:  
SOCRE Project  
Design Revisions

Legend

- LiDAR Structure
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12kV-UG

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230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

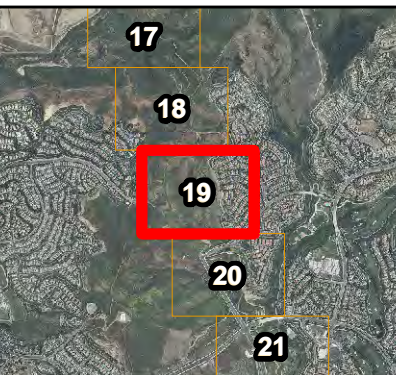
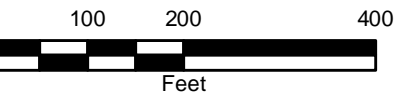
Permanent

Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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Figure 1:  
SOCRE Project  
Design Revisions

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Vaults

12kV-UG

69kV-OH

138kV-OH

138kV-UG

230kV-OH

230-UG

Distribution Lines

LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

Temporary

Permanent

New Impacts

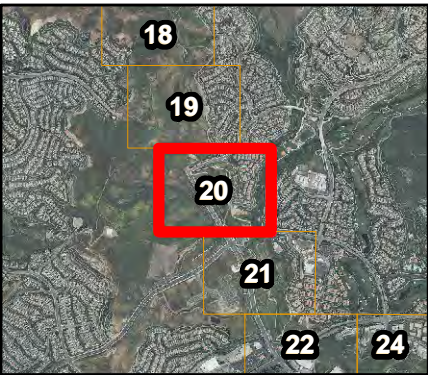
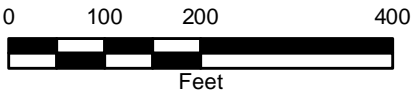
Permanent

Temporary

PEA/DEIR - Impact Removed

No Longer an Impact

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Figure 1:  
SOCRE Project  
Design Revisions

**Legend**

- LiDAR Structure
- Distribution Cable Pole
- Proposed Structures
- PEA/DEIR Pole Locations

**Vaults**

- 12kV-UG
- 69kV-OH
- 138kV-OH
- 138kV-UG
- 230kV-OH
- 230-UG

**Distribution Lines**

- LaPata Road Grading

**Project Modifications**

**Same as PEA/DEIR Design**

- Temporary
- Permanent

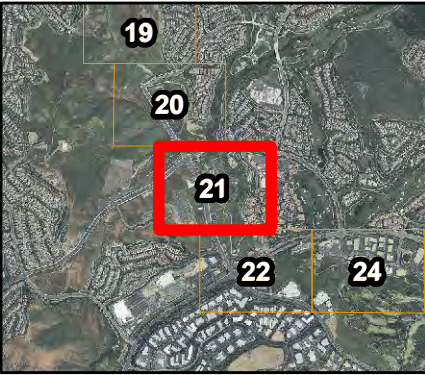
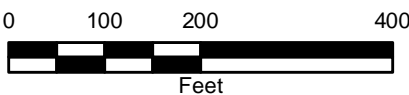
**New Impacts**

- Permanent
- Temporary

**PEA/DEIR - Impact Removed**

- No Longer an Impact

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Figure 1:  
SOCRE Project  
Design Revisions

**Legend**

- LiDAR Structure
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**Vaults**

- 12kV-UG
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**Distribution Lines**

- LaPata Road Grading

**Project Modifications**

**Same as PEA/DEIR Design**

- Temporary
- Permanent

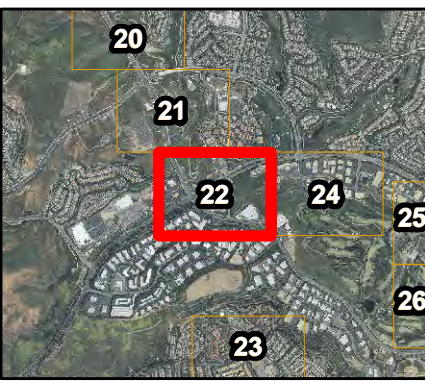
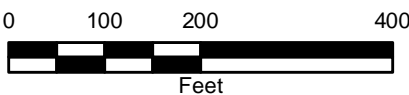
**New Impacts**

- Permanent
- Temporary

**PEA/DEIR - Impact Removed**

- No Longer an Impact

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SOCRE - 15-0002 Current Design vs PEA\_2400scale\_2015\_04\_10\_rev4.Mxd (mtvaneck)



Figure 1:  
SOCRE Project  
Design Revisions

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Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

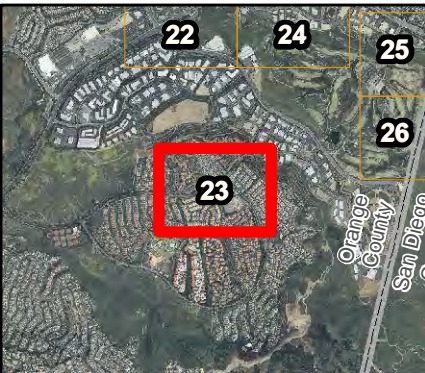
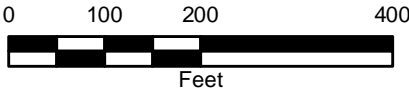
New Impacts

- Permanent
- Temporary

PEA/DEIR - Impact Removed

- No Longer an Impact

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Figure 1:  
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- 12kV-UG
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- 138kV-UG
- 230kV-OH
- 230-UG
- Distribution Lines
- LaPata Road Grading

Project Modifications

Same as PEA/DEIR Design

- Temporary
- Permanent

New Impacts

- Permanent
- Temporary

PEA/DEIR - Impact Removed

- No Longer an Impact

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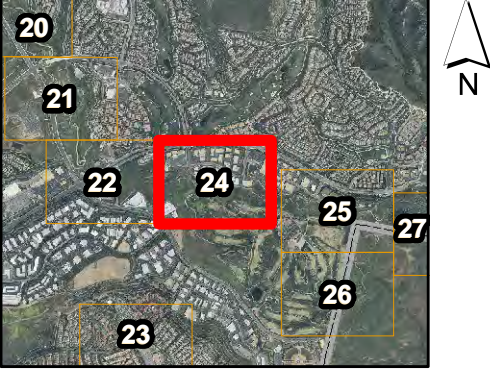
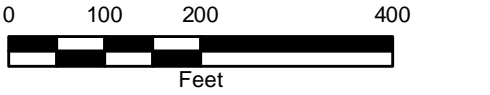




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**Project Modifications**

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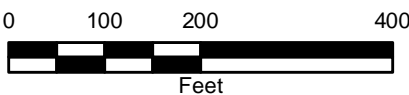
**New Impacts**

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- Temporary

**PEA/DEIR - Impact Removed**

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12kV-UG

69kV-OH

138kV-OH

138kV-UG

230kV-OH

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Distribution Lines

LaPata Road Grading

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Same as PEA/DEIR Design

Temporary

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New Impacts

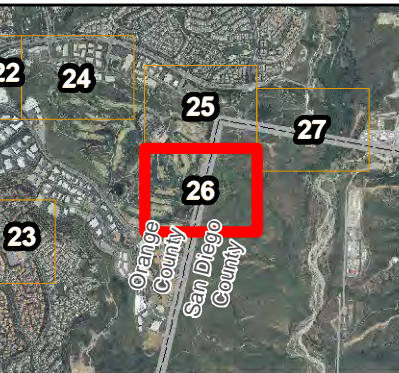
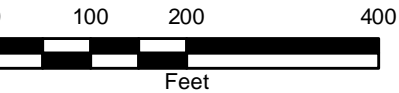
Permanent

Temporary

PEA/DEIR - Impact Removed

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Figure 1:  
SOCRE Project  
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12kV-UG

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138kV-UG

230kV-OH

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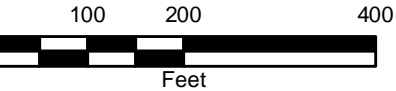
Permanent

Temporary

PEA/DEIR - Impact Removed

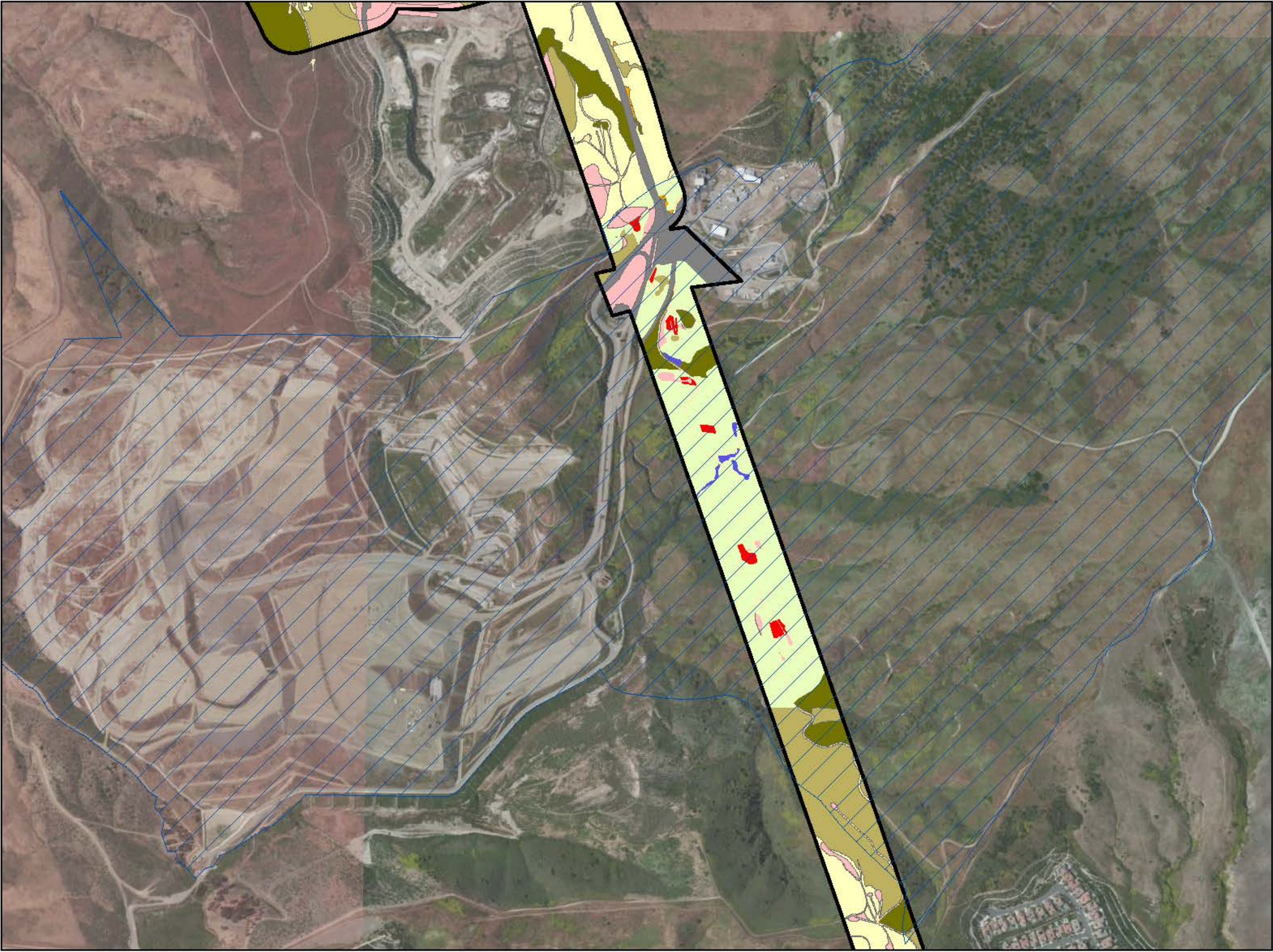
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**South Orange County  
Reliability Enhancement  
Project**

USFWS Mapped Potential  
Development Areas

**Figure 2**

- Potential Development
- Impacts to Potential Development (formally Ruderal)
- Survey Area
- Coastal Sage Scrub
- Developed
- Dirt Road
- Disturbed
- Disturbed Coastal Sage Scrub
- Disturbed Willow Riparian
- Freshwater Marsh
- Ornamental
- Potential Development (formerly Ruderal)
- Riparian Scrub
- Ruderal
- Willow Riparian



4/9/2015      330      0      330      660 Feet



Sources: TRC, 2015; SDG&E, 2015; ESRI, DigitalGlobe, GeoEye, Earthstar, USGS, Getmapping, Aerogrid, iCP, swisstopo, and the GIS user community; NatGeo



**Attachment B – Proposed Mitigation Measure Revisions and Technical Corrections & Clarifications**  
**South Orange County Reliability Enhancement Project**  
**SDG&E Comments on Draft Environmental Impact Report**



Comment #	Section Name	Page #	Paragraph, Line, or Table	General Comment	Specific Comment	
					Existing Language	Revised Language
ES – Executive Summary						
1.		ES-4	Lines 10 – 14	Pursuant to Comments below from Draft EIR Sections 4.15 and 6.0, SDG&E believes that significant, unavoidable impacts are limited to Air Quality. This section of the Executive Summary should be updated accordingly.	Three Significant Impacts. Three significant and unavoidable adverse environmental impacts have been identified. Construction of the proposed project would result in a significant and unavoidable adverse environmental impact related to air emissions, as described in Section 4.3, “Air Quality,” and road closures as described in Section 4.15, “Transportation and Traffic,” and Chapter 6, “Cumulative Impacts and Other CEQA Considerations.”	<del>Three</del> <u>One</u> Significant Impacts. <del>Three</del> <u>One</u> significant and unavoidable adverse environmental impacts <del>have</del> has been identified. Construction of the proposed project would result in a significant and unavoidable adverse environmental impact related to air emissions, as described in Section 4.3, “Air Quality,” <del>and road closures as described in Section 4.15, “Transportation and Traffic,” and Chapter 6, “Cumulative Impacts and Other CEQA Considerations.”</del>
1.0 – Introduction						
2.	SDG&E has no comments on this section.					
2.0 – Project Description						
3.		2-67	Line 7	Construction within Camino Capistrano is not anticipated to close the entire road. Only one lane at a time is anticipated to be closed during construction of Proposed Project Segment 1a.	Partial closure of the roadway would be required during the proposed construction activities, and full closure may be required for short-term periods.	<del>Partial closure of the roadway would be required during the proposed construction activities, but</del> Full road closures of Camino Capistrano are <u>not anticipated. The draft traffic control plan provided by SDG&amp;E’s substation contractor includes temporary restriping to accommodate three lanes of travel during underground construction within Camino Capistrano, and full closure may be required for short-term periods.</u>
4.		2-67	13-14	Calle San Diego will not be closed during construction of Proposed Project Segment 1a. SDG&E now plans to extend the jack-and-bore under Calle San Diego.	Partial or full closure of Calle San Diego would be required during the proposed project construction activities, which would take approximately 2 weeks along Calle San Diego.	<del>Partial or full closure of Calle San Diego would be required during the proposed project construction activities, which would take approximately 2 weeks along Calle San Diego.</del>
5.			21-22	Via Pamplona would not be fully closed during construction of Proposed Project Segment 2. Refer to Attachment A ( <u>Minor</u> Project <u>Design</u> Refinements <u>Report</u> ) which outlines preliminary construction layout and traffic control which would allow for construction of Segment 2 with only partial closure of Via Pamplona.	Via Pamplona, which intersects with Vista Montana, would be partially or fully closed for approximately 2 months.	Via Pamplona, which intersects with Vista Montana, would be partially <del>or fully</del> closed for <u>up to</u> approximately 2 months.
6.	2.0	2-8	Table 2-1	Post-Proposed Project Table list proposes five lines into Pico Substation, there can be only four.	TL13846 Talega - Pico	TL 13846 Talega <del>– San Mateo</del> - Pico
7.	2.0	2-8	Table 2-1 footnote e	Footnote “e” is not accurate and should be revised.	TL13846 (new) and TL 13812 are formed from a single 138kV line (TL13846 [existing])	TL 13812 (new) <del>is and TL 13835 are</del> formed from a single 138kV line ( <u>TL13835</u> <del>TL13846</del> [existing])
8.	2.0	2-8	Table 2-1 footnote d	Footnote “d” is not accurate and should be revised.	TL 13835 (new) and TL 13847 are formed from a single 138kV line (TL 13835 [existing])	TL <del>13835 (new) and</del> 13847 is formed from a single 138kV line TL 13835 [existing]
9.	2.0	2-8	Table 2-1	In the Post-Proposed Project, remove the extra line to Pico Substation, as it would not exist.	TL 13835 (San Mateo – Pico)	<del>TL 13835 (San Mateo – Pico)</del>

Attachment B – Proposed Mitigation Measure Revisions and Technical Corrections & Clarifications  
South Orange County Reliability Enhancement Project  
SDG&E Comments on Draft Environmental Impact Report



Comment #	Section Name	Page #	Paragraph, Line, or Table	General Comment	Specific Comment	
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10.	2.0	2-42	Lines 7-10	Revise description – only some of the 230kV foundations can be constructed without outages on TL13835.	Most of the grading for access road and structure foundation construction would be completed as an early step after start of construction. After grading is complete, foundations for many of the proposed 230-kV structures could be constructed. Line TL13835 would not need to be de-energized for these construction activities and could occur during peak load season as needed.	Most of the grading for access road and structure foundation construction would be completed as an early step after start of construction. After grading is complete, foundations for <del>many</del> <u>some</u> of the proposed 230-kV structures could be constructed. Line TL13835 would not need to be de-energized for these construction activities and could occur during peak load season as needed.
11.	2.0	2-67	Lines 36-38	Remove the maximum 40-foot limitation, as foundations could be larger depending upon final engineering and field conditions.	These recommendations may include increased grading; additional erosion, drainage, or landslide control measures; and deeper bore hole depth for foundations (to a maximum of 40 feet), among others.	These recommendations may include increased grading; additional erosion, drainage, or landslide control measures; and deeper bore hole depth for foundations <del>(to a maximum of 40 feet)</del> , among others.
3.0 - Description of Alternatives						
12.	3.2.6	3-11	20-21	SDG&E notes that while the Draft EIR states “Alternative C1 includes sufficient design details to ensure that analysis pursuant to CEQA may be conducted.” (pg. 3-11 line 20-21), this alternative has not been thoroughly studied to determine its effects on the transmission system. There are probably additional system upgrades and changes required to implement this alternative that would have additional environmental impacts that are not considered in the Draft EIR.		
13.	3.2.7	3-11	36-37	SDG&E notes that while the Draft EIR states “Alternative C2 includes sufficient design details to ensure that analysis pursuant to CEQA may be conducted.” (pg. 3-11 line 36-37), this alternative has not been thoroughly studied to determine its effects on the transmission system. There are probably additional system upgrades and changes required to implement this alternative that would have additional environmental impacts that are not considered in the Draft EIR.		
4.1 – Aesthetics						
14.	SDG&E has no comments on this section.					

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4.2 – Agriculture and Forestry						
15.	Impact AG-3	4.2-5	Lines 29 - 41	Impact conclusion (Less than Significant) does not match impact discussion (No Impact). Impact conclusion should be revised to match the impact discussion.	<b>Impact AG-3:</b> Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of Forest Land to non-forest use.  LESS THAN SIGNIFICANT  The proposed project would be primarily located within existing ROWs and property owned by the applicant. Construction of the transmission line would be transient and would not impact one location long enough to result in any temporary changes, which, due to the location or nature, could result in the conversion of Farmland or Forest Land to non-agricultural or non-forest uses. Construction of the San Juan Capistrano Substation would not be located adjacent to farmland; therefore, the proposed project would have no impact on farmland or Forest Land during the 64-month construction period. Operation and maintenance activities would be similar to those associated with the existing facilities and, therefore, the proposed project would have a less than significant impact under this criterion.	<b>Impact AG-3:</b> Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of Forest Land to non-forest use.  <u>NO IMPACT</u>  <u>LESS THAN SIGNIFICANT</u>  The proposed project would be primarily located within existing ROWs and property owned by the applicant. Construction of the transmission line would be transient and would not impact one location long enough to result in any temporary changes, which, due to the location or nature, could result in the conversion of Farmland or Forest Land to non-agricultural or non-forest uses. Construction of the San Juan Capistrano Substation would not be located adjacent to farmland; therefore, the proposed project would have no impact on farmland or Forest Land during the 64-month construction period. Operation and maintenance activities would be similar to those associated with the existing facilities and, therefore, the proposed project would <u>have a less than significant</u> <u>no</u> impact under this criterion.
4.3 – Air Quality						
16.	4.3 Air Quality	4.3-7	Paragraph 4	It should be noted that the RAQS is a strategy to attain the CAAQS for ozone and does not address other pollutants. The SDAPCD has also prepared its Eight-Hour Ozone Attainment Plan, which addresses the NAAQS and was adopted as part of the California SIP.		
17.	4.3 Air Quality	4.3-9	Table 4.3-4	The significance threshold for sulfates is incorrect and should be based on a 24-hour average of 25 µg/m³. The most recent revision of the SCAQMD’s CEQA significance thresholds is dated March 2011, and this version should be cited rather than SCAQMD 1993b. Please see <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2</a>		

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18.	APMs	4.3-11	APM AQ-1	This APM proposed by SDG&E does not include the enforcement of the speed limit by radar on unpaved roads. Requiring additional on-site enforcement staff during construction is unnecessary and could potentially result in increased emissions from additional driving on access roads. SDG&E commonly utilizes posted speed limit sign and works with construction contractors and monitors to enforce speed limits. If necessary, SDG&E or its contractor(s) can install speed monitoring equipment at strategic locations and along project roads.	Limiting the on-site vehicles to a 15 mile-per-hour speed limit enforced by radar on unpaved roads.	Limiting the on-site vehicles to a 15 mile-per-hour speed limit <del>enforced by radar</del> on unpaved roads. <u>If necessary, SDG&amp;E or its contractor(s) can install speed monitoring equipment at strategic locations and along project roads.</u>
19.	4.3 Air Quality	4.3-12	Paragraph 5	As stated under Comment 16, the RAQS does not address the NAAQS. The RAQS only addresses the CAAQS. The SDAPCD's Eight-Hour Ozone Attainment Plan, which is part of the California SIP, addresses the NAAQS.		
<b>4.4 – Biological Resources</b>						
20.	4.4.3.3	4.4-38	Paragraph 3	Species type (arroyo chub) appears to have been mistakenly copied from previous section in the DEIR. Revise text as appropriate.	Implementation of MM BR-1 and MM BR-2 would reduce potentially significant impacts on the arroyo chub to a less- than-significant level by avoiding suitable habitat for this species and employing monitors to prevent any foreseeable impact on the southern steelhead.	Implementation of MM BR-1 and MM BR-2 would reduce potentially significant impacts on the <del>arroyo chub</del> <u>southern steelhead</u> to a less- than-significant level by avoiding suitable habitat for this species and employing monitors to prevent any foreseeable impact on the southern steelhead.
21.	4.4.3.3 Environmental Impacts	4.4-46	Paragraph 3 – Line 14 -16	Impact BR-3 <i>Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act...</i> - This analysis assumes that the proposed project will not impact jurisdictional wetland therefore; no wetland permitting under the CWA is needed. Thus not “contemplated” and determined less than significant without mitigation. A change to the project description (or the inability to “reorientate the temporary workspace” identified in the PEA as 25 linear feet of impacts to an ephemeral drainage) that may require wetland permitting, would potential require a Petition for Modification based on this analysis. 1. Trigger a new permit requirement and 2. Without mitigation result in a new significant impact.	“In the event that the applicant could not avoid impacts on the tributary, then additional consultation, permitting, and/or mitigation would be required.”	“In the event that the applicant <del>could not</del> cannot avoid impacts <del>on the tributary</del> to jurisdictional features, then additional consultation <u>with ACOE, RWQCB, and CDFW will occur and applicant will obtain required permitting and potential additional mitigation or as required by the appropriate resource agency, permitting, and/or mitigation would be required.</u> ”

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22.	4.4.3.3	4.4-47	Paragraph 1 – Lines 34 - 29	<p>Impact BR-5 - <i>Conflict with any local polices or ordinances protecting biological resources such as a tree preservation policy or ordinance. <u>Less than significant</u></i></p> <p>The analysis for the proposed project and Operation and Maintenance is conflicting. The Draft EIR states “would carry out tree trimming and removal activities in accordance with applicable county regulations and the terms of any applicable permits”, in addition the NCCP/HCP is also referenced. No additional Project Mitigation Measures were included in the significance findings. However, the Operation and Maintenance analysis includes not only the applicable regulation and the NCCP/HCP but also includes the Project Mitigation Measure BR1- BR4.</p> <p>Suggest removing reference to MM BR1-BR4 in the Operation and Maintenance section to achieve consistency in the overall analysis which is less than significant (without additional mitigation i.e. BR1-4). Also, SDG&amp;E’s NCCP is incorrectly referred to as NCCP/HCP in the DEIR. The correct term is NCCP; HCP should be removed throughout the DEIR.</p>	This maintenance work would be conducted consistent with CPUC General Order 95, Rule 35 and California Public Resources Code Sections 4292 and 4293. Additionally, incorporation of MM-BIO-1 through MM BIO-4, designed to reduce impacts on native vegetation and special status species, including trees and special status natural communities, along with following the SDG&E Subregional NCCP/HCP, would reduce impacts on trees to a level that is less than significant	This maintenance work would be conducted consistent with CPUC General Order 95, Rule 35 and California Public Resources Code Sections 4292 and 4293. Additionally, <del>incorporation of MM-BIO-1 through MM-BIO-4, designed to reduce impacts on native vegetation and special status species, including trees and special status natural communities, along with</del> following the SDG&E Subregional NCCP/ <del>HCP</del> , would reduce impacts on trees to a level that is less than significant.
23.	4.4.1.2	4.4-5	Table 4.4-2	The total for the impacts is incorrect. The correct total is 565.89.	Total for habitat impacts is 565.90	Total for habitat impacts <del>needs to be corrected to</del> <u>is</u> 565.89.
24.	4.4.1.2	4.4-5	Table 4.4-2	As an attachment to Appendix L-1, Appendix H labels all of the areas within the survey corridor as ruderal. This classification of ruderal was reclassified in the Draft EIR as non-native grassland. However, smaller areas labeled ruderal and surrounded by development were not analyzed as potentially being disturbed habitat and were labeled with the blanket classification of non-native grassland without the benefit of a survey. Many areas as shown in Appendix H are noncontiguous with any other vegetation communities and according to the species of plants observed and documented in Appendix L-1, not all of the areas in Appendix H may qualify as non-native grassland. The use of the word “ruderal” has meant that frequent and repeated disturbance occurs, and these areas are normally isolated or noncontiguous, as well as dominated by non-native weedy species in areas that have been significantly disturbed by agriculture,	Footnote 2: Vegetation classified in Appendices L-1 and L-2 as “ruderal” areas has been reclassified to non-native grasslands or appropriate contiguous habitat.	<p><u>Footnote 2: Vegetation classified in Appendices L-1 and L-2 as “ruderal” areas has been reclassified to non-native grasslands or appropriate contiguous habitat, except where such areas are both noncontiguous and repeatedly disturbed or overlap with USFWS planning areas designated as “Potential Development.”</u></p> <p><u>SDG&amp;E will conduct preactivity surveys per the NCCP/HCP prior to construction and areas of repeated disturbance will be considered as either disturbed habitat or non-native grassland, depending on the appropriate characterization as documented in the Preactivity Survey Report.</u></p>



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				construction, or other land-clearing activities. An example of a type of repeated land clearing activities that occur in Orange County is the removal of vegetation for “defensible space” per Orange County Fire Authority.		
25.	4.4.1.2	4.4-5	Table 4.4-2	Based on the approved Orange County Southern Subregional HCP (OCSSHCP), the GIS Preserve layers provided by the USFWS has revealed that an area previously categorized as “ruderal” vegetation and reclassified in the Draft EIR as non-native grassland is designated as “Potential Development.” The GIS layer from the USFWS is based upon future planning in the area of the OCSSHCP and one large area has been classified as “Potential Development,” specifically in the area of La Pata Road and the Prima Deshecha Landfill (Proposed Project Segment 3. The GIS data for the Orange County Southern Subregional HCP was recently provided to SDG&E by the USFWS Carlsbad office. This information is a basis for reducing impacts to what has been designated in the Draft EIR as a sensitive habitat (non-native grassland).  This also addresses BR-6 which calls for coordination within Preserve areas to reduce conflicts with an adopted Habitat Conservation Plan (HCP).	Footnote 2: Vegetation classified in Appendices L-1 and L-2 as “ruderal” areas has been reclassified to non-native grasslands or appropriate contiguous habitat.	<u>Footnote 2: Vegetation classified in Appendices L-1 and L-2 as “ruderal” areas has been reclassified to non-native grasslands or appropriate contiguous habitat, except where such areas are both noncontiguous and repeatedly disturbed or overlap with USFWS planning areas designated as “Potential Development.”</u>
26.	4.4.1.3	4.4-11	Table 4.4-3	One of the totals for impacts within a water feature is incorrect; therefore the total is incorrect.	Total for Tributary to San Juan Creek is currently $0.55 + 0.06 = 0.56$ ; therefore the total is currently 17.88	Total for Tributary to San Juan Creek is currently $0.55 + 0.06$ , which should equal 0.61; therefore the total needs to be revised to 17.93
27.	4.4.1.5	4.4-18	Lines 47-48	This reference in the Draft EIR may not be accurate because several Union Tribune articles do not detail where the mountain lion(s) accessed the ocean on Camp Pendleton. Several articles found on the internet from the Union Tribune, one article dated June 26, 2010 and the other dated July 23, 2010 may or may not be the same article referenced in the Draft EIR:  <a href="http://www.utsandiego.com/news/2010/jun/26/tracking-a-big-cat-researchers-follow-tagged/">http://www.utsandiego.com/news/2010/jun/26/tracking-a-big-cat-researchers-follow-tagged/</a>  <a href="http://www.utsandiego.com/news/2010/jul/23/regional-mountain-lion-study-tracks-big-cats/">http://www.utsandiego.com/news/2010/jul/23/regional-mountain-lion-study-tracks-big-cats/</a>	However, the Wildlife Health Center at the University of California Davis tracked a mountain lion through the proposed project area in 2010 (UT San Diego 2010).	<del>However, the Wildlife Health Center at the University of California Davis tracked a mountain lion through the proposed project area in 2010 (UT San Diego 2010).</del>
28.	4.4.2.1	4.4-26	Line 27	The new form used on MCB Camp Pendleton is the Request for Environmental Impact Report (REIR) and not the Preliminary Environmental Datasheet (PED). The Navy on Fallbrook Naval Weapons Station uses	However, SDG&E would be subject to environmental documentation requirements (i.e. submit the Navy’s/Marines’ Preliminary Environmental Datasheet for review) pursuant to Marine Corps	However, SDG&E would be subject to environmental documentation requirements <u>(i.e. submit the Marine Corps Request for Environmental Impact Report)</u> pursuant to Marine Corps

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				another form called the EARR. It probably is more accurate to state the REIR is only used by the Marines.	Executive Order 5090.2.	Executive Order 5090.2.
29.	4.4.2.3	4.4-28	Line 32-33	The species referred to in these sentences are called “Narrow Endemic” and more easily recognized when labeled with this name.	The SDG&E Subregional NCCP/HCP limits take authorizations for these species to emergencies and unavoidable impacts from repairs to existing facilities.	The SDG&E Subregional NCCP/ <del>HCP</del> limits take authorizations for these <u>Narrow Endemic Species</u> to emergencies and unavoidable impacts from repairs to existing facilities.
30.	4.4.2.3	4.4-29	Line 7-9	The SDG&E Subregional NCCP places a 400-acre limit on impacts in natural areas. This limit does not equate to mitigation credits, and the phrase “mitigation (i.e., mitigation credits)” should be deleted for clarity.	The SDG&E Subregional NCCP/HCP allows for up to 400 acres of mitigation (i.e., mitigation credits) of impacts on natural areas before requiring a plan amendment.	The SDG&E Subregional NCCP/ <del>HCP</del> allows for up to 400 acres <del>(i.e., mitigation credits)</del> <u>of impacts in natural areas before requiring a plan amendment.</u>
31.	4.4.2.3	4.4-29	Line 9	SDG&E is currently working with USFWS and CDFW to confirm the most current estimate of natural habitat acreage available for impacts under the SDG&E Subregional NCCP. SDG&E will provide this confirmation to the CPUC once it is available.	As of 2013, approximately 134 acres of possible 400 have been used (SDG&E 2014).	
32.	4.4.3.3	4.4-35	Lines 6-7	Critical Habitat does not currently exist on MCB Camp Pendleton.	Critical habitat for arroyo toad occurs adjacent to Transmission Line Segment 1b and Segment 4 and associated 12-kV distribution line Segment M near Talega Substation.	Critical habitat for arroyo toad occurs adjacent to Transmission Line Segment 1b and Segment 4 and associated 12-kV distribution line Segment M near Talega Substation, <u>but not on MCB Camp Pendleton.</u>
33.	4.4.3.3	4.4-38	Lines 15-16	Per Figure 2-1 Overview of Proposed Substation and T-lines, the proposed project does not span Cristianitos Creek as stated in Line 15. However, it does span a tributary on the west side of Talega Substation. The tributary passes under the substation along a concrete lined channel.	The proposed project components would span the creek; however, direct and indirect impacts on the southern steelhead may still occur.	<u>Cristianitos Creek is east of Talega Substation and the proposed project does not span the creek ; however, it does span a small tributary. This tributary passes under Talega Substation; therefore, direct and indirect impacts on the southern steelhead may still occur.</u>
34.	4.4.3.3	4.4-38	Lines 21-25	Arroyo chub is mentioned twice in the section on southern steelhead. Substitute arroyo chub for southern steelhead in this section.	MM BR-2 requires biological monitors to be present during construction activities in areas where sensitive resources have been identified and to halt construction in the event that construction or restoration activities have the potential to impact an <u>arroyo chub</u> . Implementation of MM BR-1 and MM BR-2 would reduce potentially significant impacts on the <u>arroyo chub</u> to a less-than-significant level by avoiding suitable habitat for this species and employing monitors to prevent any foreseeable impact on the southern steelhead.	<u>MM BR-2 requires biological monitors to be present during construction activities in areas where sensitive resources have been identified and to halt construction in the event that construction or restoration activities have the potential to impact southern steelhead. Implementation of MM BR-1 and MM BR-2 would reduce potentially significant impacts on the southern steelhead to a less-than-significant level by avoiding suitable habitat for this species and employing monitors to prevent any foreseeable impact on the southern steelhead.</u>

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35.	Operations and Maintenance	4.4-48	Lines 14-16 and Lines 23-25	<p>Impact BR-6 states that the SDG&amp;E Subregional NCCP/HCP processes do not reduce conflicts with the provisions of an adopted HCP or other conservation areas to less than significant. This results in Project Mitigation BR-10.</p> <p>The section below on pages 2 and 3 of the SDG&amp;E subregional NCCP addresses any conflict that might arise by pointing out the unique nature of utility work as well as the ongoing consultation with the USFWS and CDFW per existing processes. The process of submitting a Preactivity Survey Report and allowing the USFWS and CDFW to review and comment will occur per the NCCP. On page 43 of the NCCP it states, “Take of the species to be avoided (or narrow endemics) may not occur for non-emergency repair work without first conferring with the USFWS and CDFG.” During a Preactivity Survey and biological monitoring, if a narrow endemic species, as listed in the NCCP, is discovered, consultation with the USFWS and CDFW will take place prior to construction with avoidance being the first priority.</p> <p><i>The applicability of Habitat Conservation Plans will be triggered by local permit applications filed by persons seeking to pursue projects falling within the regulatory authority of such local governments. However, because SDG&amp;E's projects do not fall within the regulatory authority of local governments, none of the underlying Habitat Conservation Plans will be suitable to address the particular and unique issues raised by public utilities. SDG&amp;E has resolved this problem by developing this Subregional Plan in coordination with the United States Fish and Wildlife Service (USFWS) and California Department of Fish &amp; Game (CDFG) addressing SDG&amp;E's activities and their potential impact upon Covered Species or their habitat throughout the area of its operations.</i></p>	The processes specified in the SDG&E Subregional NCCP/HCP to consider the objectives of other HCPs/NCCPs and to coordinate within preserve areas would reduce conflicts with the provisions of an adopted HCP or other conservation areas, but not to a level that is less than significant.	The processes specified in the SDG&E Subregional NCCP/ <del>HCP</del> to consider the objectives of other HCPs/NCCPs and to coordinate within preserve areas would reduce conflicts with the provisions of an adopted HCP or other conservation areas, <del>but</del> to a level that is less than significant.
36.	4.4.4	4.4-52/4.4-53	Lines 22-45 through to Lines 1-3 on the next page	<p>The section of the SDG&amp;E Subregional NCCP above also addresses Mitigation Measure BR-10 of the Draft EIR in regards to all three bullet points:</p> <ul style="list-style-type: none"><li>The use of preserve layers provided by the USFWS is inclusive of the City of San Juan Capistrano, City of San Clemente, County of</li></ul>	<p>Mitigation Measure BR-10: Mitigation Plan Development. In order to prevent potential conflicts between the SDG&amp;E Subregional NCCP/HCP and other conservation plans and land, the applicant will prepare a mitigation plan for the project.</p> <p>Bullet Points 2, 3, and 4</p> <ul style="list-style-type: none"><li>In order to prevent potential conflicts, SDG&amp;E will</li></ul>	<p>Mitigation Measure BR-10: Mitigation Plan Development. In order to prevent potential conflicts between the SDG&amp;E Subregional NCCP/HCP and other conservation plans and land, the applicant will prepare a mitigation plan for the project.</p> <p>Bullet Points 2, 3, and 4</p> <ul style="list-style-type: none"><li><del>In order to prevent potential conflicts, SDG&amp;E will</del></li></ul>

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				<p>Orange, CDFW and USFWS. The other two entities: California Department of Parks and Recreation and MCB Camp Pendleton, as well as these municipalities, have their own processes that will be followed.</p> <ul style="list-style-type: none"><li>According to the NCCP and the Implementing Agreement, inconsistencies are not possible due to SDG&amp;E Subregional Plan’s coordination and communication with the USFWS and CDFW.</li><li>Coordination already takes place with the agencies in the form of a Preactivity Survey Report and consultation for any Narrow Endemics.</li></ul> <p>The following two sections from the NCCP Implementing Agreement document the unique nature of a SDG&amp;E activities that occur within an existing easement:</p> <p>Page 8, Section 2.5:</p> <p><i>Though SDG&amp;E will utilize its best efforts to coordinate its implementation of the Subregional Plan with the implementation of such Habitat Conservation Plans, as more fully described in Section 6 of the Subregional Plan, and, though SDG&amp;E relies upon and utilizes for the Subregional Plan information contained in biological studies prepared for such Habitat Conservation Plans, the Subregional Plan shall be implemented as an overlay of and independent of any Habitat Conservation Plan within the boundaries of which any SDG&amp;E Activity takes place or any SDG&amp;E Facility is located. Nothing in this Agreement, Subregional Plan, the Take Authorizations shall be construed to diminish or extend the powers or authority of any local government to regulate any SDG&amp;E Activity or Facility. SDG&amp;E's Activities, for purposes of the Subregional Plan, shall be governed solely by the terms and conditions of the Subregional Plan, this Agreement, and the Take Authorizations.</i></p> <p><b>Page 21 Section 7.2</b></p> <p><i>Finally, the Subregional Plan, unlike many NCCP/HCPs does not depend on the creation of a</i></p>	<p>coordinate with all relevant jurisdictions, plan participants, and landholders associated with the preserve areas crossed by the project, including but not limited to the City of San Juan Capistrano, City of San Clemente, County of Orange, California Department of Parks and Recreation, Marine Corps Base (MCB) Camp Pendleton, CDFW, and USFWS.</p> <ul style="list-style-type: none"><li>The plan will outline how SDG&amp;E will communicate with the relevant jurisdictions, plan participants, and landholders about the project activities in preserve areas. A process for resolving inconsistencies between SDG&amp;E’s transmission and distribution activities in a preserve area and the mission of the overlapping jurisdiction, conservation plan, or easement will be outlined.</li><li>This plan will be submitted to the USFWS, CDFW, and CPUC for review and comment no more than six months prior to the start of construction, with the intent to produce a final draft of the plan, approved by the CPUC, no later than two months prior to the start of construction.</li></ul>	<p><del>coordinate with all relevant jurisdictions, plan participants, and landholders associated with the preserve areas crossed by the project, including but not limited to the City of San Juan Capistrano, City of San Clemente, County of Orange, California Department of Parks and Recreation, Marine Corps Base (MCB) Camp Pendleton, CDFW, and USFWS.</del></p> <ul style="list-style-type: none"><li><del>The plan will outline how SDG&amp;E will communicate with the relevant jurisdictions, plan participants, and landholders about the project activities in preserve areas. A process for resolving inconsistencies between SDG&amp;E’s transmission and distribution activities in a preserve area and the mission of the overlapping jurisdiction, conservation plan, or easement will be outlined.</del></li></ul> <p><del>This plan will be submitted to the USFWS, CDFW, and CPUC for review and comment no more than six months prior to the start of construction, with the intent to produce a final draft of the plan, approved by the CPUC, no later than two months prior to the start of construction.</del></p>



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				<i>multi-jurisdictional habitat preserve. <u>Instead the Subregional Plan is premised upon the avoidance of impacts to Covered Species and their Habitat and provision of minimization and mitigation measures where such impacts are unavoidable. The implementation of the Subregional Plan is independent of other NCCP/HCPs and the Covered Species for which Incidental Take is authorized under the Take Authorizations is not dependent upon the implementation of such plans.</u></i>		
<b>4.5 – Cultural Resources</b>						
37.	4.5.4 MM CUL-1	4.5-19	Lines 23, 24	The requirement to have an archaeologist and paleontologist present the cultural/paleontological components at every training will be difficult to implement as trainings typically occur on- and off-site multiple times a week for new construction personnel during construction and archaeologists/paleontologists may be required concurrently to monitor project construction. A CPUC-approved archaeologist and paleontologist will develop the cultural and paleontological components that will be presented at the trainings.	The cultural and paleontological resources training components will be presented by a CPUC-approved cultural resources consultant (see MM CUL-3) and CPUC-approved paleontological consultant (see MM CUL-6). The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.	The cultural and paleontological resources training components will be <del>presented</del> <u>developed</u> by a CPUC-approved cultural resources consultant (see MM CUL-3) and CPUC-approved paleontological consultant (see MM CUL-6). The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.
38.	4.5.4 MM CUL-2	4.5-19	Lines 37-39	Archaeological monitoring may not be required for ground disturbing activities that occur in non-culturally sensitive deposits such as bedrock or artificial fill, or areas of the 12kV distribution line with no cultural resource concerns as determined by additional surveys.	Confirm that archeological monitoring will be performed during all ground disturbing activities along Segment 1a of the 230-kV transmission line, Segment A of the 12-kV distribution line, and within the proposed San Juan Capistrano Substation to prevent potential damage to buried Juaneño/Acjachemen deposits.	Confirm that archeological monitoring will be performed during all ground disturbing activities <u>in areas with known resources or sediments with the potential to contain buried cultural deposits</u> along Segment 1a of the 230-kV transmission line, Segment A of the 12-kV distribution line, and within the proposed San Juan Capistrano Substation to prevent potential damage to buried Juaneño/Acjachemen deposits.
39.	4.5.4 MM CUL-4	4.5-20	Lines 16-20	Tribes that express interest in the proposed project during later phases (end of construction/restoration) may not have the opportunity to participate in surveys. In addition, reference to MM CUL-1 appears to be errata. Suggested revisions provided.	In addition, the applicant will provide evidence to the CPUC that tribes that have expressed interest in the project during any phase (i.e., project application through end of construction and restoration) have been given the opportunity to participate in additional cultural resources surveys (MM CUL-1) and cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CUL-3).	In addition, the applicant will provide evidence to the CPUC that tribes that <del>have</del> <u>expressed</u> interest in the project during any phase (i.e., project application through end of construction and restoration) have been given the opportunity to participate in additional cultural resources surveys (MM CUL- <del>1</del> <u>5</u> ) and <u>or</u> cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CUL-3).
40.	4.5.4 MM CUL-4	4.5-20	Lines 38-40	Errata – MM CUL-10 is not a mitigation measure in the Draft EIR.	Interpretation of a find will be requested from Native American monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report (MM CUL-10).	Interpretation of a find will be requested from Native American monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report <del>(MM CUL-10)</del> .

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41.	4.5.4 MM CUL-4	4.5-20	Lines 44-45	Start dates depend on numerous factors including agency approvals of NTPs. Thirty days' notice may not always be feasible.	Native American monitors approved by a tribe for monitoring work on the project will be notified 30 days prior to start of construction of the various project components.	Native American monitors approved by a tribe for monitoring work on the project will be notified <u>30 days as soon as possible</u> prior to start of construction of the various project components.
42.	4.5.4 MM CUL-5	4.5-21	Lines 7-10	Please revise for clarity.	Prior to issuance of construction permits, the applicant will ensure that qualified archaeological consultants, as specified in MM CUL-3, will conduct intensive-level cultural resources surveys (transects no greater than 10 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed.	Prior to issuance of <del>construction permits</del> <u>the notice to proceed</u> , the applicant will ensure that qualified archaeological consultants, as specified in MM CUL-3, will conduct intensive-level cultural resources surveys (transects no greater than 10 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed.
43.	4.5	4.5-1	Line 13	Revision to clarify text.	For the purpose of analysis in this section, the term “cultural resources” encompasses historical resources; archeological resources (which may be historic or prehistoric, and are a subset of historical resources); Native American resources; and paleontological resources. The Cultural Resources Technical Report and supplemental survey information prepared by San Diego Gas & Electric Company (SDG&E, or “the applicant”) are included in Appendix M.	For the purpose of analysis in this section, the term “cultural resources” encompasses historical resources <u>and</u> archeological resources (which may be historic or prehistoric, and are a subset of historical resources); Native American resources; and paleontological resources. The Cultural Resources Technical Report and supplemental survey information prepared by San Diego Gas & Electric Company (SDG&E, or “the applicant”) are included in Appendix M.
44.	4.5.1.1	4.5-4	Lines 30,31	Please add a sentence regarding the percent of the study area that has been previously surveyed.	Of these, 41 of the previously conducted cultural resource studies had survey areas that overlap the 30 searched area.	Of these, 41 of the previously conducted cultural resource studies had survey areas that overlap the searched area, <u>covering approximately 60 % of the study area.</u>
45.	4.5.1.1,	4.5-6	Line 35	Add additional statement for further clarification. Add all Native American correspondence in an appendix and possibly a table of all attempts to contact Native American representatives.	On March 29, 2012, 33 Ms. Perry sent an email to SDG&E requesting archaeological and Native American monitors for most of the site locations and to be informed of the project's progress.	On March 29, 2012, 33 Ms. Perry sent an email to SDG&E requesting archaeological and Native American monitors for most of the site locations and to be informed of the project's progress. <u>To date, no additional responses have been received.</u>
46.	4.5.2.2	4.5-8	Line 39	Revision/Clarification	The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC §5024.1[a]).	The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources <u>potentially qualify</u> <del>deserve</del> to be protected, to the extent prudent and feasible, from substantial adverse change (PRC §5024.1[a]).
47.		4.5-13	Line 36	Clarification	To determine whether cultural or paleontological resources have been previously identified within the proposed project area, the CPUC reviewed published scientific documents and technical and survey reports regarding areas in proximity to components of the proposed project, as well as general plan and policy documents.	To determine whether cultural or paleontological resources have been previously identified within the proposed project area, the <u>applicant and the</u> CPUC reviewed published scientific documents and technical and survey reports regarding areas in proximity to components of the proposed project, as well as general plan and policy documents.
48.	4.5.3.2 APMs	4.5-15	Line 38	Add language regarding HABS/HAER Documentation.	APM CUL-10 Building of Distinction Requirements	<u>Prior to demolition, Historic American Buildings Survey (HABS) Level II documentation of the Former Utility Building/Complex.</u>



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4.6 – Geology, Soils, and Mineral Resources						
49.	4.6	4.6-5	Lines 13 & 14	Figure 4.6-1 is referenced to show the regional faults and epicenters, but the figure does not show any of the active faults or any epicenters.	Figure 4.6-1 shows the regional faults and earthquake epicenters in the area.	Delete the sentence or revise Figure 4.6-1 to show the referenced features. Epicenters are not needed since they are not material to the impact analysis.
50.	4.6	4.6-6	Line 43	The description that “...California Department of Conservation, Division of Mines and Geology, has mapped areas of ... potential for permanent ground displacements such that mitigation, as defined in California Public Resources Code Section 2693(c) would be required” is accurately taken from the Division of Mines and Geology map legend, but it misleading for this undertaking because Section 2193 does not apply to this undertaking. The undertaking does not meet the definition of a “project” under 2621.6 or 2193. These maps provide valuable information that is relevant to baseline information for the undertaking, but the Seismic Hazards Mapping Act does not impose any requirements on this undertaking. The reason that the Applicant is proposing APM GEO-1 and GEO-2 is to commit to geotechnical studies and review that would otherwise occur under the Seismic Hazards Mapping Act for undertakings that meet the definition of “Project” under the Act.	“...such that mitigation, as defined in California Public Resources Code Section 2693(c) would be required.”	<del>such that mitigation, as defined in California Public Resources Code Section 2693(c) would be required.</del>
51.	4.6	4.6-6	Line 44	The landslide susceptibility shown in Figure 4.6-2 is far more general than the California Department of Conservation mapping referenced in preceding paragraphs. Discussion of the California Department of Conservation mapping followed by presentation of a different more general depiction on Figure 4.6-2 is misleading. Figure 4.6-2 should be revised to show the California Department of Conservation mapping.		
52.	4.6	4.6-7	Figure 4.6-2	It is unclear what is depicted by the “Impact Areas” shown in this figure. Text or legend should clarify what is depicted by these areas.		
53.	4.6	4.6-11	Lines 10 and 11	See comment # 51 to page 4.6-6 Line 43.	“...such that mitigation, as defined in California Public Resources Code Section 2693(c) would be required.”	<del>“...such that mitigation, as defined in California Public Resources Code Section 2693(c) would be required.”</del>

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54.	4.6	4.6-12	Line 27 through 34	“Article 10 of the California Code of Regulations” is an incomplete citation. Furthermore, reference to the Seismic Hazards Mapping Act requiring a geotechnical investigation is misleading since the undertaking is not a “project” under the Act.	In accordance with the provisions of the Seismic Hazards mapping Act, Article 10 of the California Code of regulations (CGS Seismic Hazards Zonation Program), requires that site-specific geotechnical investigations be performed prior to permitting projects within Seismic Hazard Zones. The geotechnical report must ...identify any known off-site seismic hazards that could adversely affect the site in the event of an earthquake.	The Seismic Hazards Mapping Act and implementing regulations in California Code of Regulations Title 14, Division 2, Chapter 8, Subchapter 1, Article 10, require that a geotechnical report be prepared by a qualified registered civil engineer or certified engineering geologist when an undertaking in a Seismic Hazard Zone meets the Act’s definition of a “project.” <u>Because the Applicant’s undertaking does not meet the definition of a “project” under the Seismic Hazards Mapping Act, the Applicant has proposed APM GEO-1 and APM GEO-2 committing to geotechnical studies that would address seismic hazards.</u>
55.	4.6	4.6-15	Lines 43 and 44	This paragraph references the City of San Juan Capistrano’s adoption of the 1997 UBC, which has been revised. Has the City adopted the 2010 CBC and/or the 2009 IBC?	The City of San Juan Capistrano has adopted the 1997 Uniform Building Code, 1997 Uniform Mechanical Code, 1997 Uniform Fire Code, and the 1997 National Electric Code.	Revise or add language to identify the current codes will apply.
56.	Impact GE-1	4.6-18	Line 39	Figure 4.6-1 is referenced for fault locations, but the figure does not show the locations. Delete reference to Figure 4.6-1 or revise figure to show referenced locations.		
57.	Impact GE-3	4.6-19	Lines 45 through 49	The Article 10 reference is incomplete. In addition, the undertaking does not meet the definition of a “project” under 2621.6 or 2193 so the Seismic Hazards Mapping Act does not impose any requirements on this undertaking. The reason that the Applicant is proposing APM GEO-1 and GEO-2 is to commit to geotechnical studies and review that would otherwise occur under the Seismic Hazards Mapping Act for undertakings that meet the definition of “Project” under the Act. If special geotechnical studies are needed at poles 1a-5a to limit risk to a less than significant level, then those studies should be required as a mitigation measure.		
58.	Impact GE-4	4.6-20	Line 21	Figure 4.6-2 is referenced for CGS-mapped landslides but the Figure does not show CGS mapping.		
4.7 - Greenhouse Gases						
59.	4.7 Greenhouse Gases	4.7-8	Entire Page	The County of San Diego’s Climate Action Plan (CAP), and its associated GHG significance thresholds, have been challenged in court, and at this time the County is not using or citing the CAP or the GHG thresholds.		



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4.8 - Hazards and Hazardous Materials						
60.	4.8.1.1	4.8-3	Table 4.8-3	Remove reference to CHHSLs – CHHSLs do not apply and should not be used for heavy petroleum hydrocarbons	Total recoverable petroleum hydrocarbons...Column 4.  Hazardous Waste <ul style="list-style-type: none"><li>Concentration exceeds CHHSLs solid of 117mg/kg</li><li>Concentration exceeds EPA Region IX RSLs for TPH of 420 mg/kg</li></ul>	Total recoverable petroleum hydrocarbons...Column 4.  Hazardous Waste <ul style="list-style-type: none"><li><del>Concentration exceeds CHHSLs solid of 117mg/kg</del></li></ul> Concentration exceeds EPA Region IX RSLs for TPH of 420 mg/kg <del>Total recoverable petroleum hydrocarbons...Column 4.</del> <del>Hazardous Waste</del> <del>Concentration exceeds EPA Region IX RSLs for TPH of 420 mg/kg</del>
61.	Impact HZ-6	4.8-25	Lines 14 & 15	Impact HAZ-6 discusses the potential impacts associated with wildland fires. However, lines 14 and 15 reference MM HAZ-3, which relates to worker training regarding safety procedures for work on MCAS Miramar. Lines 14 and 15 should instead reference MM HAZ-4, which requires Project-Specific Fire plan be prepared that meets the objectives and standards of the OCTA.	Implementation of MM HAZ-3 would reduce the impacts associated with the increased fire risk to less than significant.	Implementation of MM HAZ- <del>34</del> would reduce the impacts associated with the increased fire risk to less than significant.
62.	4.8.1.1	4.8-2	Line 1-3	Impacted soils, lead paint on structures and un-disturbed asbestos containing materials are not a waste until they have been removed or abated, Wastes are profiled and then hazardous waste determination is made.	Although search results from hazardous waste databases did not identify any hazardous waste sites on or near the proposed project site, hazardous waste investigations performed by the applicant have identified hazardous waste on the project site. The applicant performed the following hazardous waste investigations of the proposed Capistrano Sub Station:	Although search results from hazardous waste databases did not identify any hazardous waste sites on or near the proposed project site, <del>hazardous waste</del> <u>hazardous substances</u> investigations performed by the applicant have identified <del>hazardous waste</del> <u>impacted soil, lead-based paint and asbestos containing materials</u> on the project site. The applicant performed the following hazardous <del>waste</del> <u>substances</u> investigations of the proposed Capistrano Sub Station:
63.	4.8.3.3	4.8-20	Line 44-50	Asbestos containing materials will be abated prior to demolition. Green paint that is loose or flakey on metal frames of doors and windows will be abated. Remaining green paint will be stabilized. Metal frames will be removed and recycled. Exterior paint on stucco is very thin and will not lend to removal. Construction debris will be sampled and tested to determine appropriately disposal of waste. Demolition will comply with all OSHA and Cal OSHA notifications and standards by an appropriately qualified contractor.	As identified from past asbestos and lead-based paint surveys (see Tables 4.8-1 and 4.8-2), construction of the proposed San Juan Capistrano Substation would require removal of contaminated materials and site remediation prior to demolition. As detailed in APM Haz-3, the applicant would use specialized crews to conduct removal and remediation activities. The specialized crews would be qualified to handle asbestos, lead-based paint and other hazardous materials/wastes in accordance with OSHA and Cal OSHA standards. As a result, impacts from the disposal of hazardous waste during construction would be less than significant.	As identified from past asbestos and lead-based paint surveys (see Tables 4.8-1 and 4.8-2), construction of the proposed San Juan Capistrano Substation would require <del>removal of</del> <u>abatement or stabilization of</u> contaminated materials and site remediation prior to demolition. As detailed in APM Haz-3, the applicant would use specialized crews to conduct removal and <del>remediation</del> <u>stabilization</u> activities. The specialized crews would be qualified to handle asbestos, lead-based paint and other hazardous materials/wastes in accordance with OSHA and Cal OSHA standards. As a result, impacts from the disposal of hazardous waste during construction would be less than significant.

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64.	4.8.3.3	4.8-21	1-10	Through communication with MCB Camp Pendleton and review of Camp Pendleton Military Installation mapping that depicts live fire ranges and artillery firing areas it has been confirmed that no there are no areas of concern indicating potential for encountering spent bullets or duds. Therefore, this paragraph is not applicable and should be removed as this concern will not apply.	A scoping comment from MCB Camp Pendleton noted that the soil, wood metal or other construction debris removed from the project area within the MCB Camp Pendleton property may be contaminated from the activities and materials associated with the Marine base, such as lead contamination form discharged bullets. Improper disposal of this debris could result in a significant impact; MM HAZ-2 would require the applicant to test any material that would be removed from within the MCB Camp Pendleton boundaries in accordance with EPA Best Management Practices for Outdoor Shooting Ranges (EPA-902-B-01-001). Additionally, the mitigation would also require any solid lead or copper removed from the base to be recycled in accordance with the base Qualified Recycling Program regulations. Implementation of MM HAZ-1 and MM HAZ-2 would reduce the risk of improperly disposing of materials and contaminated soils from MCB Camp Pendleton to a less that significant level.	<del>A scoping comment from MCB Camp Pendleton noted that the soil, wood metal or other construction debris removed from the project area within the MCB Camp Pendleton property may be contaminated from the activities and materials associated with the Marine base, such as lead contamination form discharged bullets. Improper disposal of this debris could result in a significant impact; MM HAZ-2 would require the applicant to test any material that would be removed from within the MCB Camp Pendleton boundaries in accordance with EPA Best Management Practices for Outdoor Shooting Ranges (EPA-902-B-01-001). Additionally, the mitigation would also require any solid lead or copper removed from the base to be recycled in accordance with the base Qualified Reecycling Program regulations.</del> Implementation of MM HAZ-1 and MM HAZ-2 would reduce the risk of improperly disposing of materials and contaminated soils from MCB Camp Pendleton to a less that significant level.
65.	4.8.3.3 & 4.8.4	4.8-21 & 4.8-26	Line 22-37	As noted in the comment above, MM HAZ-2 is not applicable to the portion of the proposed project on MCB Camp Pendleton. MM HAZ-2 should be deleted.		
66.	4.8.3.3	4.8-23	47-48	Asbestos was not found in soil in 2009.	...As Discussed in Section 4.8.1.1, soil sampling in 2009 detected lead, asbestos, and contaminated soil at the lower yard, and perimeter of the upper yard.	...As Discussed in Section 4.8.1.1, soil sampling in 2009 <u>and building surveys</u> detected lead, asbestos, and contaminated soil at the lower yard, and perimeter of the upper yard.
67.	4.8.4	4.8-25	28	“substances” includes materials and waste	MM HAZ-1: Hazardous Materials Contamination Prevention Plan. Prior to construction, the applicant shall prepare and implement a Hazardous Materials Contamination Plan supplementing the Hazardous Materials Business Plan to prevent the release of hazardous materials and hazardous waste. The plan will include the following	MM HAZ-1: Hazardous <del>Materials</del> <u>Substances</u> Contamination Prevention Plan. Prior to construction, the applicant shall prepare and implement a Hazardous Materials Contamination <u>Prevention</u> Plan supplementing the Hazardous Materials Business Plan to prevent the release of hazardous materials and hazardous waste. The plan will include the following
68.		4.8-11 4.8-21 4.8-25	19-20 42 30	The Capistrano and Talega Substations are currently in operation and each have a Hazardous Materials Business Plan (HMBP) that will be followed during construction. The requirements should be revised to require an update to the existing Capistrano and Talega Substation HMBPs following completion of construction, as appropriate.		
4.8 - Hydrology and Water Quality						
69.	4.9.1.2	4.9-2	Figure 4.9-1	Figure showing the number of perennial and intermittent creeks and drainages that cross the proposed project is missing.		



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70.		4.9-3	Figure 4.9-1	The title of the Figure is “Groundwater Basins in the Proposed Project Area” but the figure shows hydrologic subareas instead of ground water basins.	Figure Title : “Groundwater Basins in the Proposed Project Area”	Figure Title: “ <u>Hydrologic Subareas near the Project</u> ”
71.		4.9-5	Reference to Figure 4.9-1	Figure 4.9-1 does not show ground water basins.	“(Figure 4.9-1)”	Delete reference to figure or add ground water basin boundaries to Figure 4.9-1.
72.	Impact WQ-5	4.9-19	Line 23	Construction activities will not generate storm water runoff. Dust control is unlikely to generate runoff.	Project construction would generate storm water runoff and runoff from dust control activities.	<u>When adequate precipitation occurs storm water runoff would occur from the construction area, and from the stabilized ground surface after construction is complete.</u>
73.	Impact WQ-8	4.9-21	Line 25 & 26	The conclusion should be that the risk would be less than significant. No impact is expected.	Therefore, impacts under this criterion would be less than significant.	<u>Therefore, risks to people and structures would be less than significant.</u>
74.	Impact WQ-9	4.9-22	Line 4	Mudflows can be initiated days after precipitation has stopped. Furthermore, emergency crews sometimes need to perform inspections or repairs in inclement weather.	“...and would not be onsite during precipitation events substantial enough to initiate a mudflow. “	<del>and would not be onsite during precipitation events substantial enough to initiate a mudflow.</del>
75.	Impact WQ-9	4.9-22	Line 4	The conclusion should be that the risk would be less than significant. No impact is expected.	Therefore, potential impacts under this criterion would be less than significant.	Therefore, risks to people and structures would be less than significant.
<b>4.9 - Land Use and Planning</b>						
76.	4.10.3.3	4.10-37	29 – 43	Information concerning road and lane closures should be updated consistent with comment to Section 2 and 4.15.	<p>Construction of the proposed project may cause temporary disturbance to established communities as a result of road closures during work with road rights-of-way (ROWs). As noted in Section 2.4.9, “Roadway and Railway Crossings and Road Closures,” the proposed transmission and distribution lines route would cross a number of roadways, including Interstate 5 (I-5). However only four roads may be partially or fully closed during construction:</p> <ul style="list-style-type: none"> <li>Camino Capistrano in San Juan Capistrano would require partial closures and may require full roadway closures for short- periods during the 1.5-month construction period.</li> <li>Calle San Diego in San Juan Capistrano would require partial closures and may require full roadway closures for as long as two weeks.</li> <li>Vista Montana Road in San Juan Capistrano, is the entrance roadway to San Juan Hills High School and the Rancho San Juan residential development from La Pata Avenue would require partial closures for approximately eight months.</li> <li>Via Pomplon in San Juan Capistrano would require partial closures and may require full roadway closures for approximately two months.</li> </ul> <p>Roads that may result in temporary full road closures have other</p>	<p>Construction of the proposed project may cause temporary disturbance to established communities as a result of partial, temporary road closures during work with road rights-of-way (ROWs). As noted in Section 2.4.9, “Roadway and Railway Crossings and Road Closures,” the proposed transmission and distribution lines route would cross a number of roadways, including Interstate 5 (I-5). However only <del>three</del><u>four</u> roads may be partially <del>or fully closed during underground construction within the roadway:</del></p> <ul style="list-style-type: none"> <li><del>Camino Capistrano in San Juan Capistrano would require partial closures and may require full roadway for short-periods during the 1.5-month construction period at this location. Traffic control would be used to ensure that there would be no full closure of Camino Capistrano and to maintain three lanes of travel during construction on Camino Capistrano.</del></li> <li><del>Calle San Diego in San Juan Capistrano would require partial closures and may require full roadway closures for as long as two weeks.</del></li> <li>Vista Montana Road in San Juan Capistrano, is the entrance roadway to San Juan Hills High School and the Rancho San Juan residential development from La Pata Avenue would require partial closures for approximately eight months.</li> </ul>



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					nearby roads that would be available as detours for community residents and would not divide an existing community.	<ul style="list-style-type: none"><li>• Via <del>Peamplona</del> in San Juan Capistrano would require partial closures <del>and may require full roadway closures</del> for approximately two months.</li></ul> Roads that may result in temporary <del>full</del> road closures have other nearby roads that would be available as detours for community residents and would not divide an existing community.
77.	Impact LU-2	4.10-39	Line 26	The CPUC retains discretionary authority for electrical utility projects subject to GO 131-D. MM AES-1 wrongly grants the local agency (City of San Juan Capistrano) discretionary authority over the construction of the San Juan Capistrano Substation. Refer to comments to Section 4.1. Section 4.10 should be updated consistent with revisions to Section 4.1 and MM AES-1.	As described in Section 4.1, “Aesthetics,” the applicant would be required to implement Mitigation Measure (MM) AES-1, which require the applicant to obtain approval City Architectural Review Board’s approval of the design of the proposed San Juan Capistrano Substation facilities and landscaping prior to building and restore disturbed areas to pre-project conditions.	As described in Section 4.1, “Aesthetics,” the applicant would be required to implement Mitigation Measure (MM) AES-1 <del>and MM AES-2</del> , which requires the applicant to obtain <del>approval input from the</del> City Architectural Review Board <del>s approval</del> <u>for consideration in</u> the design of the proposed San Juan Capistrano Substation facilities and landscaping prior to <u>final design and construction of the Substation</u> .
78.	Impact LU-2	4.10-39	Line 34-35	Repeated sentence.	No designated underground districts were identified within the proposed project area. No designated underground districts were identified within the proposed project area.	No designated underground districts were identified within the proposed project area. <del>No designated underground districts were identified within the proposed project area.</del>
4.11 – Noise and Vibration						
79.	SDG&E has no comments on this section.					
4.12 – Population and Housing						
80.	SDG&E has no comments on this section.					
4.13 - Public Services and Utilities						
81.	Solid Waste	4.13.3	Table 4.13-3	Table 4.13-3 need to be amended to add the Otay Landfill, which could be used for proposed project-generated waste if waste cannot be taken to the Prima Deschecha Landfill.		
4.14 - Recreation						
82.	SDG&E has no comments on this section.					
4.15 Traffic and Transportation						
83.	4.15	4.15-4	Table 4.15-3	Table note 3 is not defined.		
84.	4.15	4.15-15	Line 32	Traffic study references methodology, including reference to traffic volumes on area roadways in year 2020. However, the year 2020 traffic volumes are not referenced within Section 4.15, but instead are referenced within the impact discussion within Draft EIR Section 6.4.15.	To asses impacts associated with this additional traffic, Linscott Law and Greenspan Engineers assessed traffic volumes on area roadways in year 2015 and year 2015 plus proposed project traffic volumes (Year 2020).	To asses impacts associated with this additional traffic, Linscott Law and Greenspan Engineers assessed traffic volumes on area roadways in year 2015 and year 2015 plus proposed project traffic volumes <del>(Year 2020)</del> .



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85.	4.15	4.15-16	Line 13	Incorrect reference.	South Orange County Reliability Enhancement Project Environmental Assessment Report (May 2012).				South Orange County Reliability Enhancement <del>Proponent's</del> <u>project</u> Environmental Assessment Report (May 2012).			
86.	4.15	4.15-18	Lines 6, 8, & 9	Need to update description of road closures. As outlined further in Attachment A, Project Refinement Report, SDG&E's contractors do not anticipate full road closures during underground construction within Camino Capistrano, Calle San Diego, and Via Pamplona.	During construction of the proposed project, partial or full closure would occur on the following roadways: <ul style="list-style-type: none"><li>Camino Capistrano (partial or full closure)</li><li>Vista Montana (partial closure)</li><li>Via Pamplona (partial or full closure)</li><li>Calle San Diego (partial or full closure)</li></ul>				During construction of the proposed project, partial or full closure would occur on the following roadways: <ul style="list-style-type: none"><li><del>Camino Capistrano (partial or full closure)</del></li><li>Vista Montana (partial closure)</li><li>Via Pamplona (partial <del>or full</del> closure)</li><li>Calle San Diego (partial <del>or full</del> closure)</li></ul>			
87.	4.15	4.15-18	Table 4.15-5	SDG&E's contractor has developed draft traffic control plans for Camino Capistrano, which would allow for three lanes of traffic on Camino Capistrano during construction (refer to Attachment A, Project Design Revisions). With the implementation of the traffic control plans, the capacity of Camino Capistrano would not be reduced, and degradation of traffic circulation would not exceed levels considered unacceptable. Impacts to traffic circulation would therefore be less than significant.	ADT	V/C	Existing LOS		ADT	V/C	Existing LOS	
					15,462	1.237	F		15,462	<del>1.237</del> <u>0.82</u>	<del>F</del> <u>D</u>	
88.	4.15	4.15-18	Table 4.15-5	Camino Capistrano (south of SR-74) should not be listed with reduced capacity due to lane closures. No lane closures will occur on Camino Capistrano south of the intersection with SR-74.	ADT	V/C	Existing LOS		ADT	V/C	Existing LOS	
					19,162	1.533	F		19,162	<del>1.533</del> <u>0.76</u>	<del>F</del> <u>C</u>	
89.	4.15	4.15-19	Lines 2 - 4	With implementation of draft traffic control plans for Camino Capistrano, there would be no change in daily roadway segment operations.	As shown in Table 4.15-5, with the addition of the proposed project traffic, there is no change in the daily roadway segment operations LOS in the year 2015 scenario, with the exception of Camino Capistrano.				As shown in Table 4.15-5, with the addition of the proposed project traffic, there is no change in the daily roadway segment operations LOS in the year 2015 scenario, <del>with the exception of Camino Capistrano.</del>			
90.	4.15	4.15-19	Line 11 and 12	Revise text to reflect lack of full road closures from underground construction.	However, full road closures of Camino Capistrano, Via Pamplona, and Calle San Diego would significantly impact roadway segment operations.				However, <del>partial</del> <u>full</u> road closures <u>during underground construction of Camino Capistrano, Via Pamplona, and Calle San Diego</u> would <u>result in less than</u> significantly impacts <u>on</u> roadway segment operations.			
5.0 – Comparison of Alternatives												
91.	Refer to the detailed comments provided separately.											
6.0 - Cumulative Impacts and Other CEQA Considerations												
92.	6.7	6-37	Lines 23 - 25	Draft EIR Section 6.7 incorrectly states that the Proposed Project would result in the permanent conversion of lands identified as important farmland. Draft EIR Section 4.2.3.3 states that there would be	As discussed in Section 4.2, “Agriculture and Forestry Resources,” construction of the proposed project would result in the permanent conversion of lands identified as important farmland.				<del>As discussed in Section 4.2, “Agriculture and Forestry Resources,” construction of the proposed project would result in the permanent conversion of lands identified as important farmland.</del>			



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				“no impact” to prime farmland, unique farmland, or farmland of statewide importance. The statement in Draft EIR Section 6.7 should be deleted.		
93.		6-33	Lines 29 – 38	The impact identified as cumulatively significant is in fact restating the same traffic impact in consideration of projected year 2020 traffic volumes. However, construction on Camino Capistrano would occur well before year 2020, and as explained under previous comments, draft traffic control plans for Camino Capistrano would allow for full roadway capacity during underground construction and impacts would be less than significant.		
7.0 – List of Preparers						
94.	SDG&E has no comments on this section.					
8.0 - Mitigation, Monitoring, and Reporting Plan						
95.	Table 8-1	Throughout MM RP	Timing	Restoration and monitoring is an ongoing process that may occur over several (5-10) years post-construction (depending on approach and success criteria), and will require varying, but increasingly lessening, degrees of activity. Cleanup and Restoration is analyzed and defined in the Draft EIR as an approximately 4 month period “ongoing throughout the remainder of construction” (Section 2.4.1, Table 2-6). Therefore, “Cleanup and Restoration” is considered and included as a component of construction. MMs may be interpreted as a requirement during long-term restoration monitoring, and are unnecessary in most cases. Remove this requirement in the Timing section to avoid confusion with the timeframe of restoration plans or agency permits. Alternatively, clarify to avoid varying interpretations and to make consistent with the definition of restoration in the Draft EIR (Section 2.6.1.4, 22 “Other Environmental Procedures and Protocols,” under the, “Cleanup and Restoration”).	During construction and restoration.  Prior to and during construction and restoration.	During construction-and restoration.  Prior to and during construction-and restoration.



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96.		8-5	MM AES-1	MM AES-1 incorrectly states that the SDG&E needs to obtain approval from the San Juan Capistrano Architectural Review Board (ARB) for the design and Landscaping Plan of the San Juan Capistrano Substation. Local agencies are not afforded discretionary review over projects under the siting jurisdiction of the CPUC. While SDG&E appreciates the ARB's substantive input on the landscaping and exterior wall for the San Juan Capistrano Substation location, the CPUC determines the appropriate design and mitigation necessary for electric utility projects. MM-AES-1 should be limited to requiring SDG&E to consult with the ARB, and obtaining CPUC approval of its plans. To do otherwise would set dangerous precedent on the preemption under General Order 131-D.	MM AES-1: To ensure that the design of San Juan Capistrano Substation facilities such as walls, buildings, and landscaping are consistent with the City of San Juan Capistrano's design criteria, the applicant shall submit a revised series of elevations and a landscape plan to the City's Architectural Review Board (ARB) prior to filing for grading and building permits. The ARB shall determine if the applicant's revised plans are consistent with the City's design criteria and if any modifications are needed. The applicant shall not initiateinitiate ground disturbing activities until the ARB approves the design and landscaping plan for the proposed San Juan Capistrano Substation. (Draft EIR at 4.1-43.)	MM AES-1: To ensure that the design of San Juan Capistrano Substation facilities such as walls, buildings, and landscaping are consistent with the City of San Juan Capistrano's design criteria, the applicant shall submit a revised series of elevations and a landscape plan to the City's Architectural Review Board (ARB) prior to filing for grading and building permits. The ARB shall <del>determine if the applicant's revised plans are consistent with the City's design criteria and if any modifications are needed</del> <u>review the submitted materials and provide comments. The applicant shall work to incorporate the suggestions of the ARB where they do not conflict with proper engineering requirements or the jurisdiction of the CPUC. not initiate ground disturbing activities until the ARB approves the design and landscaping plan for the proposed San Juan Capistrano Substation.</u>
97.	Table 8-1	8-4	MM AES -2	MM AES -2 - This measure requires unnecessary coordination with the CPUC on temporary work areas that are disturbed and already defined and permitted. Adding additional/during construction consultation would be time consuming and costly. The measure is too vague to interpret and -implement. Simply state disturbed area will be restored to near pre-construction condition and stabilized as required by the SWPPP. The measure goes on to further require consultation for areas that are identified as a permanent impact, there does not appear to a direct definition of "areas required for O&M". Also there is no consideration given to the land owners individual requests which are typically memorialized in independent negotiations and property easements and often affected how temporary work areas are restored.	MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions. Clearing and ground disturbance required for construction, operation, and maintenance, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, will be the minimum required, and the applicant will consult with the CPUC to identify and implement methods to restore disturbed areas to pre-construction conditions to the extent feasible for all areas not required for operation and maintenance. For areas required for operation and maintenance, the applicant will consult with the lead agency to identify and implement methods to restore disturbed areas to conditions that would blend with the overall landscape character to the extent feasible. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance will be regraded and revegetated to restore these areas to an appearance that will help blend them into the overall landscape character.	MM AES-2: Minimize Clearing and Ground Disturbance and Restore <u>Temporarily</u> Disturbed Areas to Pre-Project Conditions. Clearing and ground disturbance required for construction, <del>operation, and maintenance</del> , including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, will be the minimum required, <del>and the applicant will consult with the CPUC to identify and implement methods</del> to restore temporarily disturbed areas to pre-construction conditions to the extent feasible <del>for all areas not required for operation and maintenance. For areas required for operation and maintenance, the applicant will consult with the lead agency to identify and implement methods to restore disturbed areas to conditions that would blend with the overall landscape character to the extent feasible. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance will be regraded and revegetated to restore these areas to an appearance that will help blend them into the overall landscape character.</del>
98.	Table 8-1	8-7	MM AQ-1	Mitigation measure AQ-1 requires the purchase of Regional Clean Air Incentive Market Trading Credits (RTC) foe every pound of NOx emissions in excess of the regional significance threshold of 100 pounds per day. The total amount of NOx RTCs to be purchased will be calculated once the construction schedule is finalized. SDG&E concurs with the mitigation proposed to offset NOx emissions from project construction, and concurs that the calculation based on	MM AQ-1: Oxides of Nitrogen (NOX) Credits. The emissions of NOX due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD regional significance threshold of 100 pounds per day. The total amount of NOX RTCs to be purchased will be calculated when the construction schedule is finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. The applicant will also track actual	MM AQ-1: Oxides of Nitrogen (NOX) Credits. The emissions of NOX due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx emissions in excess of the SCAQMD regional significance threshold of 100 pounds per day. The total amount of NOX RTCs to be purchased will be calculated when the construction schedule is finalized. The applicant will purchase and submit the required RTCs to the SCAQMD prior to the start of project construction. <del>The applicant will also track</del>



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				the construction schedule is the appropriate approach. However, SDG&E believes that requiring the tracking of daily emissions during construction, according to a monitoring plan that includes records of equipment and vehicle usage, is infeasible, imposes unnecessary cost on ratepayers, and not necessary to achieve the intent of the mitigation measure. Furthermore, because this mitigation measure requires purchasing credits prior to construction based on construction schedule, it renders the requirement to track daily emissions both redundant and unnecessary.	daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage.	<del>actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage.</del>
99.	Table 8-1	8-8	MM BR-1	Per Section 4.4.3.3 of the Draft EIR, this measure is intended to mitigate impacts to two species: arroyo chub and southern steelhead. It only applies to habitat identified in the Draft EIR; where the proposed project crosses creeks that may be occupied by these species. It does not apply to the entire proposed project. Additionally and per the Draft EIR analysis, it reduces potential impacts from ground disturbance and does not apply to all construction and operation activities.  Clarification is needed for the following requirement: “CPUC notification and approval will be required for any additional disturbance areas already identified and evaluated for the proposed project pursuant to CEQA.”	In all project locations, vehicular traffic (including movement of all equipment) will be restricted to established construction areas indicated by flagging and signage. CPUC notification and approval will be required for any additional disturbance areas already identified and evaluated for the project pursuant to CEQA. Sensitive resources, such as waterbodies, oak trees, special status plant populations, and natural communities, will be clearly marked.	<del>In all project locations</del> Where the project would cross San Juan Creek and Christianitos Creek, <del>vehicular traffic (including movement of all equipment)</del> ground disturbing activities will be restricted to established construction areas indicated by flagging and/or signage. CPUC notification and approval will be required for <del>any additional</del> disturbance <del>to</del> areas <del>that have not already been</del> identified and evaluated for the project pursuant to CEQA. <del>Sensitive Aquatic, wetland, and riparian</del> resources <del>that could be affected by the project, such as waterbodies, oak trees, special status plant populations, and natural communities,</del> will be clearly marked <del>during ground disturbance.</del>
100.	Table 8-1	8-8	MM BR-1, Timing	This measure applies to ground disturbing construction activities and does not need to be implemented during operation.	Prior to and during construction and during operation.	Prior to and during construction <del>and during operation.</del>
101.	Table 8-1	8-8	MM BR-1	Per Section 4.4.3.3 of the Draft EIR, this measure applies to San Juan Creek (as well as upstream and downstream of the area and in nearby tributaries) and Christianitos Creek.  Additionally, the requirement to maintain a minimum exclusionary buffer of 50 feet from all jurisdictional wetland features does not account for impacts to jurisdictional resources that have been permitted by the resource agencies.	All aquatic features, including vegetated washes, creeks, drainages (ephemeral and perennial), and riparian areas, will be spanned by the 230-kV transmission and 12-kV distribution line where possible. If construction will occur within 200 feet of an aquatic feature, biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features.	<del>All aquatic features</del> San Juan Creek and Christianitos Creek, including <del>their tributaries</del> <del>vegetated washes, creeks, drainages (ephemeral and perennial),</del> and <del>associated</del> riparian areas, will be spanned by the 230-kV transmission and 12-kV distribution line where possible. <del>If</del> <del>Where</del> construction will occur within 200 feet of <del>an aquatic feature</del> San Juan Creek or Christianitos Creek, biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all <del>associated</del> jurisdictional <del>wetland waters</del> features <del>to be avoided.</del>



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102.	Table 8-1	8-9	MM BR-2	Per Section 4.4.3.3 of the Draft EIR, this measure is intended to mitigate impacts to arroyo chub, southern steelhead, nesting MBTA-protected birds, and special status natural communities. It does not apply year-round to the entire project. It only applies to work that could impact nesting birds (i.e., during the nesting bird season), ground-disturbing activity in the vicinity of San Juan Creek and Christianitos Creek, and during removal of special status natural communities identified in Section 4.4.3.3, Table 4.4-6.	<b>Biological Monitoring.</b> CPUC-approved, qualified biological monitors will be present during construction and restoration activities in areas where sensitive resources identified by a CPUC-approved biologist may be impacted by construction of the project. Biological monitors will be assigned to the project in areas of sensitive biological resources. The monitors will be responsible for ensuring that impacts on special status species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities will need to be restricted in order to protect native plants and wildlife or special status species. Those restricted areas will be monitored to ensure their protection during construction.	<b>Biological Monitoring.</b> CPUC-approved, qualified biological monitors will be present during construction <del>and restoration</del> activities in areas where <u>ground disturbance will occur within 200 feet of San Juan Creek or Christianitos Creek, or sensitive resources</u> <del>nesting MBTA-protected birds identified by a CPUC-approved biologist</del> may be impacted by construction of the project, <u>as identified by a CPUC-approved biologist</u> . Biological monitors will be <del>assigned to the project in areas of sensitive biological resources</del> <u>present during removal of special status natural communities (i.e., coastal sage scrub, coastal freshwater marsh, southern willow scrub, and riparian scrub)</u> . The monitors will be responsible for ensuring that impacts on special status species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities will need to be restricted in order to protect native plants and wildlife or special status species. Those restricted areas will be monitored to ensure their protection during construction.
103.	Table 8-1	8-9	MM BR-3	The details of this measure are unnecessary and redundant, and potentially contradictory, with the requirement to implement SDG&E NCCP/HCP Operational Protocols. Section 7.1.3 of the NCCP and Section 3.2 of the QCB Low-Effect HCP describes the preactivity survey requirements.	<b>MM BR-3: Preconstruction Surveys.</b> Preconstruction surveys will be conducted by CPUC-approved, qualified biologists according to standardized methods, or for species for which protocols exist as outlined in the most current protocols available. Surveys will encompass all construction areas. As part of preconstruction surveys, the composition of the vegetation community will be surveyed to establish baseline conditions prior to disturbance, which could later be used during post-construction restoration efforts, as outlined in Section 7 of the SDG&E Subregional NCCP/HCP. The surveys will be conducted for the presence of aquatic features, special status plants, noxious weeds, and all wildlife species to prevent direct loss of vegetation and wildlife and the spread of noxious plant species. Preconstruction surveys will take place for each discrete work area within 14 days of the start of ground disturbance, or if work has lapsed for longer than 14 days.  Additionally, a CPUC-approved, qualified biologist will conduct preconstruction clearance sweeps for special status species at all access, staging, and work areas where suitable habitat is present within approximately 24 hours of construction and restoration activities each day.  If a special status species is found at any time, the CPUC will be notified within 48 hours, and the CPUC will determine the need for additional consultation with the appropriate resource agency or agencies.	<b>MM BR-3: Preconstruction Surveys.</b> Preconstruction surveys will be conducted by CPUC-approved, qualified biologists according to <u>SDG&amp;E NCCP/HCP Operational Protocols</u> <del>standardized methods, or for species for which protocols exist as outlined in the most current protocols available</del> . Surveys will encompass all construction areas. <del>As part of preconstruction surveys, the composition of the vegetation community will be surveyed to establish baseline conditions prior to disturbance, which could later be used during post-construction restoration efforts, as outlined in Section 7 of the SDG&amp;E Subregional NCCP/HCP. The surveys will be conducted for the presence of aquatic features, special status plants, noxious weeds, and all wildlife species to prevent direct loss of vegetation and wildlife and the spread of noxious plant species.</del> Preconstruction surveys will take place for each discrete work area within 14 days of the start of ground disturbance, or if work has lapsed for longer than 14 days.  Additionally, a CPUC-approved, qualified biologist will conduct preconstruction clearance sweeps for special status species <del>at</del> <u>within</u> all access, staging, and work areas where suitable habitat is present within approximately 24 hours of construction and restoration activities each day. If a special status species is found at any time, the CPUC will be notified within 48 hours, and the CPUC will determine the need for additional consultation with the appropriate resource agency or agencies.



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104.	Table 8-1	8-10	MMBR-4	<p>Mitigation Measure BR-4 dictates construction methodology that may not be feasible nor appropriate. Section 7 of the SDG&amp;E NCCP does not prohibit the use of grading, grubbing, graveling, or paving in a temporary work area as long as the area is returned to pre-construction conditions and the area is rehabilitated per the enhancement program and defined success criteria. The success of the restoration efforts is the responsibility of SDG&amp;E under the NCCP. Because SDG&amp;E is already required to successfully restore impacted areas, the means and methods should not be dictated as the mitigation measure does not provide any additional resource protection. Following the NCCP Operation Protocols and Enhancement Plan is sufficient to ensure adequate resource protection, and avoids potentially contradictory requirements.</p> <p>This mitigation should be removed. as it is satisfied through compliance with BR-1.</p>	Limit Removal of Native Vegetation Communities and Trees. The removal of native vegetation and trees will be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving will only occur for permanent project components. Temporary staging areas will be used in such a way that it facilitates post-construction restoration, per Section 7 of the SDG&E Subregional NCCP/HCP. Drive-and-crush methods will be employed.	<del>Limit Removal of Native Vegetation Communities and Trees. The removal of native vegetation and trees will be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving will only occur for permanent project components. Temporary staging areas will be used in such a way that it facilitates post-construction restoration, per Section 7 of the SDG&amp;E Subregional NCCP/HCP. Drive-and-crush methods will be employed.</del>
105.	Table 8-1	8-10	MM BR-5	Per the Draft EIR (Section 4.4.3.3), this measure is intended to mitigate for “construction of new transmission line towers, or larger ones to replace old towers, could increase the risk of death of adult raptors and larger non-raptor species by collision (APLIC 2006)”. Clarify that MM BR-5 applies to transmission towers.	MM BR-5: Avian Safe Building Standards. The applicant will design all transmission structures installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).	MM BR-5: Avian Safe Building Standards. The applicant will design all <u>new or replacement</u> transmission <del>structures-line towers</del> installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).
106.	Table 8-1	8-10	MM BR-6	Clarification of the term “certain species” is required.	If preconstruction survey protocols exist for a certain species, the plan will outline the implementation of these protocols.	If preconstruction survey protocols exist for a <u>special status avian</u> <del>certain</del> species <u>with potential to be impacted by the project</u> , the plan will outline the implementation of these protocols.
107.	Table 8-1	8-10	MM BR-6	The measure is inconsistent with current wildlife agency guidance. USFWS and CDFW cannot expressly permit removal of an active bird nest. It is incumbent on SDG&E to make its own determination as to whether the removal of a nest is permitted within the meaning of the State and Federal code.	The survey area will include the construction area, plus an additional distance large enough to accommodate the protective buffer of bird species likely to occur in proximity to the construction area. The Nesting Bird Management Plan will specify that active bird nests will not be removed during breeding season unless the project is expressly permitted to do so by the USFWS or CDFW.	The survey area will include the construction area, plus an additional distance large enough to accommodate the protective buffer of <u>native</u> bird species likely to occur in proximity to the construction area. <del>The Nesting Bird Management Plan will specify that active bird nests will not be removed during breeding season unless the project is expressly permitted to do so by the USFWS or CDFW.</del>



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108.	Table 8-1	8-11	MM BR-6	The measure is inconsistent with current wildlife agency guidance. USFWS and CDFW cannot expressly approve a buffer size or reduction. It is incumbent on SDG&E to make its own determination of appropriate nesting bird buffer sizes and/or the implementation of other appropriate avoidance measures to ensure minimization of impacts to nesting birds. When making these determinations, SDG&E may seek and receive guidance from the agencies, but they will not provide approval or concurrence.	Buffer reductions for special status species and raptors must be approved by appropriate wildlife agencies and the CPUC. Buffer reductions for common species must be approved by the CPUC.	<del>Buffer reductions for special status species and raptors must be approved by appropriate wildlife agencies and the CPUC. Buffer reductions for common species must be approved by the CPUC.</del>
109.	Table 8-1	8-11	MM BR-7	Location/extent of the required preconstruction surveys, relative to the proposed project, should be provided.	<b>MM BR-7: Coastal Cactus Wren Avoidance.</b>  a. <b>Preconstruction Surveys.</b> CPUC-approved biologists will perform preconstruction surveys in potential coastal cactus wren habitat and record the location and quality. Preconstruction surveys will take place within two weeks prior to the start of ground disturbance or when work has lapsed for longer than two weeks.	<b>MM BR-7: Coastal Cactus Wren Avoidance.</b>  a. <b>Preconstruction Surveys.</b> CPUC-approved biologists will perform preconstruction surveys in potential coastal cactus wren habitat <u>within 200 feet of each discrete work area</u> , and record the location and quality. Preconstruction surveys will take place within two weeks prior to the start of ground disturbance or when work has lapsed for longer than two weeks.
110.	Table 8-1	8-12	MM BR-7	Providing this habitat description in the MM is unnecessary and will cause interpretive and implementation conflicts. Impacts not analyzed in the CEQA process nor authorized by the CPUC will not be resolved by CDFW consultation.	b. <b>Conservation.</b> Should suitable coastal cactus wren habitat patches be identified in or within 200 feet of work areas, the areas will be avoided to the greatest extent possible during construction. Habitat includes, but is not limited to, mature cholla or prickly-pear cactus typically less than 1 meter in height, interspersed with California sagebrush, California buckwheat, and blue elderberry. Habitat patches may be as small as approximately 1acre. Habitat patches located in close proximity to construction activities should be protected by physical barriers, such as rope or signage. If habitat patches cannot be avoided, the applicant shall consult with the CDFW to determine appropriate mitigation, restoration, and/or compensation measures.	b. <b>Conservation.</b> Should suitable coastal cactus wren habitat patches <u>larger than 1 acre</u> be identified in or within 200 feet of work areas, the areas will be avoided to the greatest extent possible during construction. <del>Habitat includes, but is not limited to, mature cholla or prickly-pear cactus typically less than 1 meter in height, interspersed with California sagebrush, California buckwheat, and blue elderberry. Habitat patches may be as small as approximately 1acre.</del> Habitat patches located in close proximity to construction activities should be <del>protected by physical barriers, such as rope or signage</del> <u>clearly marked for avoidance</u> . <del>If habitat patches cannot be avoided, the applicant shall consult with the CDFW to determine appropriate mitigation, restoration, and/or compensation measures.</del>
111.	Table 8-1	8-12	MM BR-7	It is unclear under what authority Take is defined or prohibited (MBTA, CESA, FESA?). This species is not listed under CESA or FESA. Consultation with CDFW for “take” is not appropriate.	c. <b>Take Avoidance.</b> Take of coastal cactus wrens is prohibited, except in emergency situations. Should biologists identify nesting coastal cactus wrens at any time during construction, biologists will erect a buffer around the nest that sufficiently protects the nesting pair from disturbance caused by construction activities, as determined by the project-specific Nesting Bird Management Plan. The nest should be monitored regularly according to methods outlined in the Nesting Bird Management Plan and the buffer must remain in place until the nest fledges or fails. Should take be unavoidable in the event of an emergency, the applicant shall consult with CDFW to determine appropriate mitigation, restoration, and/or compensation measures.	c. <b>Take Avoidance.</b> <del>Take of coastal cactus wrens is prohibited, except in emergency situations.</del> Should biologists identify nesting coastal cactus wrens at any time during construction, biologists will <del>erect</del> <u>implement</u> a buffer around the nest that sufficiently protects the nesting pair from disturbance caused by construction activities, as determined by the project-specific Nesting Bird Management Plan. The nest should be monitored regularly according to methods outlined in the Nesting Bird Management Plan and the buffer must remain in place until <u>construction is complete or</u> the nest <del>fledges or fails</del> <u>outcome is determined</u> . <del>Should take be unavoidable in the event of an emergency, the applicant shall consult with CDFW to determine appropriate mitigation, restoration, and/or compensation measures.</del>



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112.	Table 8-1	8-12	MM BR-8	Errata Note: The Staff Report on Burrowing Owl Mitigation (2012) Take Avoidance Surveys Protocol states “it would be effective to complete an initial take avoidance survey <b>no less than</b> 14 days prior to initiating ground disturbance activities...” The MM language creates a potential conflict with interpretation and approach, i.e., requiring a survey in compliance with the Staff Report, yet stating “ <b>no more than</b> 14 days”.	Prior to ground disturbance, a CPUC-approved biologist will conduct preconstruction take-avoidance surveys for burrowing owls within 150 meters of project areas in suitable habitat no more than 14 days prior to ground-disturbing activities according to methods outlined in the CDFW’s 2012 (or most recent) Staff Report on Burrowing Owl Mitigation (CDFG 2012).	
113.	Table 8-1	8-13	MM BR-8	“Passive Eviction” is not a term used in the CDFW 2012 Staff Report. Please remove this measure to be consistent with resource agency guidance and the document cited.	c. <b>Passive Eviction.</b> Passive eviction and burrow closure are not recommended when this practice can be avoided. However, if passive eviction is required, it will occur according to CDFW’s 2012 Staff Report on Burrowing Owl Mitigation. Owls may not be evicted until a Burrowing Owl Exclusion Plan is developed and approved by CDFW and CPUC; permanent loss of occupied burrows and habitat is mitigated in accordance with the CDFW 2012 document; monitoring is conducted to ensure take is avoided during eviction procedures; and excluded owls are documented using new burrows (if this can be confirmed). Owls may not be actively evicted (e.g., captured) without prior authorization from the CDFW and CPUC.	<del>e. <b>Passive Eviction.</b> Passive eviction and burrow closure are not recommended when this practice can be avoided. However, if passive eviction is required, it will occur according to CDFW’s 2012 Staff Report on Burrowing Owl Mitigation. Owls may not be evicted until a Burrowing Owl Exclusion Plan is developed and approved by CDFW and CPUC; permanent loss of occupied burrows and habitat is mitigated in accordance with the CDFW 2012 document; monitoring is conducted to ensure take is avoided during eviction procedures; and excluded owls are documented using new burrows (if this can be confirmed). Owls may not be actively evicted (e.g., captured) without prior authorization from the CDFW and CPUC.</del>
114.	Table 8-1	8-18	MM CUL-1	The requirement to have an archaeologist and paleontologist present the cultural/paleontological components at every training will be difficult to implement as trainings typically occur on- and off-site multiple times a week for new construction personnel during construction and archaeologists/paleontologists may be required concurrently to monitor project construction. A CPUC-approved archaeologist and paleontologist will develop the cultural and paleontological components that will be presented at the trainings.	The cultural and paleontological resources training components will be presented by a CPUC-approved cultural resources consultant (see MM CUL-3) and CPUC-approved paleontological consultant (see MM CUL-6). The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.	The cultural and paleontological resources training components will be <del>presented</del> <u>developed</u> by a CPUC-approved cultural resources consultant (see MM CUL-3) and CPUC-approved paleontological consultant (see MM CUL-6). The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.
115.	Table 8-1	8-18	MM CUL-2	Archaeological monitoring may not be required for ground disturbing activities that occur in non-culturally sensitive deposits such as bedrock or artificial fill, or areas of the 12kV distribution line with no cultural resource concerns as determined by additional surveys.	Confirm that archeological monitoring will be performed during all ground disturbing activities along Segment 1a of the 230-kV transmission line, Segment A of the 12-kV distribution line, and within the proposed San Juan Capistrano Substation to prevent potential damage to buried Juaneño/Acjachemen deposits.	Confirm that archeological monitoring will be performed during all ground disturbing activities <u>in areas with known resources or sediments with the potential to contain buried cultural deposits</u> along Segment 1a of the 230-kV transmission line, Segment A of the 12-kV distribution line, and within the proposed San Juan Capistrano Substation to prevent potential damage to buried Juaneño/Acjachemen deposits.
116.	Table 8-1	8-19	MM CUL-4	Tribes that express interest in the proposed project during later phases (end of construction/restoration) may not have the opportunity to participate in surveys. In addition, reference to MM CUL-1 appears to be	In addition, the applicant will provide evidence to the CPUC that tribes that have expressed interest in the project during any phase (i.e., project application through end of construction and restoration) have been given the opportunity to participate in additional cultural	In addition, the applicant will provide evidence to the CPUC that tribes that <del>have expressed</del> interest in the project during any phase (i.e., project application through end of construction and restoration) have been given the opportunity to participate in additional cultural



**Attachment B – Proposed Mitigation Measure Revisions and Technical Corrections & Clarifications**  
**South Orange County Reliability Enhancement Project**  
**SDG&E Comments on Draft Environmental Impact Report**

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				errata. Suggested revisions provided.	resources surveys (MM CUL-1) and cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CUL-3).	resources surveys (MM CUL- <del>1</del> <sup>5</sup> ) and/or cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CUL-3).
117.	Table 8-1	8-20	MM CUL-4	Errata – MM CUL-10 is not a mitigation measure in the Draft EIR.	Interpretation of a find will be requested from Native American monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report (MM CUL-10).	Interpretation of a find will be requested from Native American monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report <del>(MM CUL-10)</del> .
118.	Table 8-1	8-20	MM CUL-4	Start dates depend on numerous factors including agency approvals of NTPs. Thirty days’ notice may not always be feasible.	Native American monitors approved by a tribe for monitoring work on the project will be notified 30 days prior to start of construction of the various project components.	Native American monitors approved by a tribe for monitoring work on the project will be notified <del>30 days</del> <u>as soon as possible</u> prior to start of construction of the various project components.
119.	Table 8-1	8-20	MM CUL-5	Please revise for clarity.	Prior to issuance of construction permits, the applicant will ensure that qualified archaeological consultants, as specified in MM CUL-3, will conduct intensive-level cultural resources surveys (transects no greater than 10 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed.	Prior to issuance of <del>construction permits</del> <u>the notice to proceed</u> , the applicant will ensure that qualified archaeological consultants, as specified in MM CUL-3, will conduct intensive-level cultural resources surveys (transects no greater than 10 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed.
120.	Table 8-1	8-32	MM Haz-6	The statement “No work would occur during times of high fire threat such as a Red Flag Warning” should not apply to working in a new, de-energized substation site as there would not be any energized equipment and low risk of fire.		
121.	Table 8-1	8-33	MM HAZ-4	<p>Focus is on fire “prevention” as opposed to fire “control”. There will be measures in place to control a small fire but the focus of the plan is to prevent fires from starting as a result of construction activities.</p> <p>Fire prevention related to electrical grounding is function of design standards and construction practices and does not need to be repeated in the Fire Prevention Plan.</p> <p>The requirement of a “Fire Risk Manager” being present at each work site, and the sole responsibility of the Fire Risk Manager to be to monitor the construction contractor’s fire-prevention activities is onerous, unnecessary and costly. Not all activities have a high risk of starting a fire. Additionally, SDG&amp;E ESP 113.1 (Section 3.1.3) provides provisions for either a designated or dedicated fire patrol for at risk fire activities during “elevated” fire conditions as defined by the Fire Potential Index (FPI).</p>	<p><b>MM HAZ-4: Fire Control and Emergency Response Plan.</b> The applicant will develop and implement a Fire Control and Emergency Response Plan. This plan and a record of contact and coordination with the Orange County Fire Authority (OCFA) will be submitted to the CPUC for review and approval 30 days prior to the start of construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Fire prevention and response practices regarding the dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; electrical grounding; and vegetation clearing.</li> <li><input type="checkbox"/> Communication protocols for onsite workers to coordinate with local agencies and emergency personnel and for the applicant’s environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased</li> </ul>	<p><b>MM HAZ-4: Fire <del>Control</del> <u>Prevention</u> and Emergency Response Plan.</b> The applicant will develop and implement a Fire <del>Control</del> <u>Prevention</u> and Emergency Response Plan. This plan and a record of contact and coordination with the Orange County Fire Authority (OCFA) will be submitted to the CPUC for review and approval 30 days prior to the start of construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Fire prevention and response practices, <u>including the proper regarding the</u> dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; <u>electrical grounding; designated parking areas; and</u> vegetation clearing; <u>appropriate climatic conditions and designated areas to perform welding or blow torch activities and other hot-work activities; and ceasing any or all work activities, including helicopter use, as directed by the OCFA or other applicable fire department representatives in response to fire incidents.</u></li> </ul>



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					<p>risk of emergency during construction or operation of the project.</p> <p><input type="checkbox"/> The assignment of Fire Risk Managers who will be present at each worksite during construction activities, whose sole responsibility will be to monitor the contractor’s fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. The Fire Risk Managers will:</p> <ul style="list-style-type: none"><li>- Maintain a complete copy of the Fire Control and Emergency Response Plan;</li><li>- Serve as liaisons to fire departments and act as points of contact for fire departments in the event of fire or other emergency;</li><li>- Manage the prevention, detection, control, and extinguishing of fires set accidentally as a result of construction activity;</li></ul> <p>Review site-specific fire control and emergency response plans with construction personnel prior to starting work at each project area;</p> <ul style="list-style-type: none"><li>- Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At a minimum, construction personnel will be trained in fire and emergency reporting and incipient-stage fire prevention, control, and extinguishing (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). Each member of the construction workforce will be trained and equipped to extinguish small fires;</li><li>- Be equipped with radio and cellular telephone access for the duration of each work day;</li><li>- Ensure that all construction personnel are provided with operational radio and cellular telephone access at each worksite to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite;</li><li>- Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel; and</li><li>- Construction workers will immediately report all fires to the nearest Fire Risk Manager.</li></ul> <p><input type="checkbox"/> Fire prevention practices, including the proper dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; electrical grounding; designated parking area, appropriate</p>	<p><input type="checkbox"/> Communication protocols for onsite workers to coordinate with local agencies and emergency personnel and for the applicant’s environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased risk of emergency during construction or operation of the project.</p> <p><input type="checkbox"/> <del>The assignment of Fire Risk Managers who</del> <b>Project Construction Managers, Contract Administrators, and/or Site Foreman</b> will be present at each worksite during construction activities, <del>whose sole responsibility</del> <b>It will be their responsibility</b> to monitor the contractor’s fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. <del>Their Fire Risk Managers responsibilities will include:</del></p> <ul style="list-style-type: none"><li>- Maintain a complete copy of the Fire <del>Control</del> <b>Prevention</b> and Emergency Response Plan;</li><li>- Serve <del>as liaisons to fire departments and act</del> as points of contact for fire departments in the event of fire or other emergency;</li><li>- Manage the prevention, detection, control, and extinguishing of fires <del>started</del> <b>set</b> accidentally as a result of construction activity;</li></ul> <p>Review site-specific <del>fire control</del> <b>Prevention</b> and Emergency Response Plan with construction personnel prior to starting work <del>in at</del> each project area;</p> <ul style="list-style-type: none"><li>- Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At a minimum, construction personnel will be trained in fire <b>prevention and</b> emergency reporting. <del>and incipient stage fire prevention, control, and extinguishing</del> <b>Each member of the construction work force will be trained and equipped to extinguish small fires</b> (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). <del>Each member of the construction workforce will be trained and equipped to extinguish small fires;</del></li><li>- <del>Be equipped with radio and/or cellular telephone access for the duration of each work day;</del></li><li>- <del>Ensure that all construction personnel are provided with operational radio and/or cellular telephone access at each worksite to allow for immediate</del> reporting of fires or other emergencies. <del>and</del> <b>e</b> <del>Ensure</del> that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite;</li><li>- <del>Maintain an updated key personnel and emergency services contact</del></li></ul>



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					climatic conditions and designated areas to perform welding or blow torch activities and other hot-work activities; and ceasing any or all work activities, including helicopter use, as directed by the OCFA or other applicable fire department representatives in response to fire incidents.  <input type="checkbox"/> The necessary fire suppression equipment (e.g., fire extinguishers), tools (e.g., shovels); and other materials necessary to prevent fires, control the spread of fire if started, and providing assistance to extinguish fires started as a result of construction of the project for construction vehicles	(telephone and email) list onsite and available to construction personnel; and  <del>Construction workers will immediately report all fires to the nearest Fire Risk Manager.</del>  <del>Fire prevention practices, including the proper dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; electrical grounding; designated parking area, appropriate climatic conditions and designated areas to perform welding or blow torch activities and other hot-work activities; and ceasing any or all work activities, including helicopter use, as directed by the OCFA or other applicable fire department representatives in response to fire incidents.</del>  <input type="checkbox"/> The <del>necessary</del> <b>required emergency</b> fire suppression equipment, <b>tools and other materials to be with each construction vehicle on the Project.</b> <del>(e.g., fire extinguishers), tools (e.g., shovels); and other materials necessary to prevent fires, control the spread of fire if started, and providing assistance to extinguish fires started as a result of construction of the project for construction vehicles</del>
122.	Table 8-1	8-35	MM WQ-1	The creek segments crossed by the proposed project are not included on the California list of impaired waterways pursuant to Clean Water Act (CWA) Section 303(d) for pesticides or any other pollutant. Pesticides are not used during construction activities. Less than significant criterion (Impact WQ-6) does not change. If pesticides are used during operation and maintenance activities SDG&E will follow all applicable laws and regulations.	<b>MM WQ-1: Pesticide Application.</b> If pesticides are used during construction or operations, they shall be applied in accordance with Federal Insecticide, Fungicide, and Rodenticide (FIFRA) labels. Applicators shall be appropriately trained and shall be certified by the California Department of Pesticide Regulation. Prior to any use of pesticides, the type of pesticides proposed for use shall be approved by the CPUC. Prior to each pesticide application the national weather service (forecast.weather.gov) shall be consulted, and no pesticides shall be applied if the chance of rain exceeds 70% within 24 hours of the proposed application time and location. Records of type and amount of pesticides used and locations of application shall be kept and submitted to the CPUC on a monthly basis during construction.	<b>MM WQ-1: Pesticide Application.</b> If pesticides are used during <del>construction or</del> operations, they shall be applied in accordance with Federal Insecticide, Fungicide, and Rodenticide (FIFRA) labels. Applicators shall be appropriately trained and shall be certified by the California Department of Pesticide Regulation. <del>Prior to any use of pesticides, the type of pesticides proposed for use shall be approved by the CPUC.</del> Prior to each pesticide application the national weather service (forecast.weather.gov) shall be consulted, and no pesticides shall be applied if the chance of rain exceeds 70% within 24 hours of the proposed application time and location. <del>Records of type and amount of pesticides used and locations of application shall be kept and submitted to the CPUC on a monthly basis during construction.</del>



Attachment B – Proposed Mitigation Measure Revisions and Technical Corrections & Clarifications  
South Orange County Reliability Enhancement Project  
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123.	Table 8-1	8-37	MM NV-2	MM NV-2 requires the applicant to conduct monthly monitoring and reporting of operational noise levels at the San Juan Capistrano substation during the first year of full operation. This would be a maintenance burden and unnecessary cost to the Project. If SDG&E documents that substation equipment is located at the required setback distances (as also required by MM NV-2), ongoing monitoring is not required.	<b>MM NV-2 Low-Noise Substation Equipment and Noise Barriers.</b> The applicant will ensure that San Juan Capistrano Substation’s operational noise levels will not exceed 45 dBA at the property boundary during the period of 10 p.m. to 7 a.m. This will be achieved by ensuring that the final substation layout provides sufficient setback between the proposed facilities and closest residential receptors, use of low- noise substation equipment, or installation of noise barriers in the perimeter of the proposed substation. The proposed 230-/138-kV and 138-/12-kV transformers will be located at a minimum distance of 100 feet away from the nearest residential property. In addition to this minimum distance, the applicant will conduct monthly monitoring and reporting of operational noise levels at the substation during the first 2 year of full operation.	<b>MM NV-2 Low-Noise Substation Equipment and Noise Barriers.</b> The applicant will ensure that San Juan Capistrano Substation’s operational noise levels will not exceed 45 dBA at the property boundary during the period of 10 p.m. to 7 a.m. This will be achieved by ensuring that the final substation layout provides sufficient setback between the proposed facilities and closest residential receptors, use of low- noise substation equipment, or installation of noise barriers in the perimeter of the proposed substation. The proposed 230-/138-kV and 138-/12-kV transformers will be located at a minimum distance of 100 feet away from the nearest residential property. <del>In addition to this minimum distance, the applicant will conduct monthly monitoring and reporting of operational noise levels at the substation during the first 2 year of full operation.</del>
124.	Table 8-1	8-38	MM NV-4	MM NV-4 requires monitoring of operational (corona) noise following completion of construction and installation of technological solutions to reduce corona noise. As shown in the Design Revision document, corona noise from the proposed 230kV transmission line will not exceed the applicable noise limit (45 dBA) at sensitive receptor locations. IN addition, the proposed project design already includes all know and feasible technological solutions that could reduce corona noise. Therefore, MM NV-4 is not needed, and does not provide functional mitigation for potential corona noise effects.	<b>MM NV-4. Corona Noise Reduction during Wet Weather Conditions.</b> The applicant will ensure that the 230-kV transmission line corona noise levels will not exceed 45 dBA at the closest sensitive receptor during nighttime operations (10 p.m. to 7 a.m.), in compliance with the City of San Juan Capistrano, City of San Clemente, and County of Orange exterior noise standards. This will be achieved by the use of additional insulation equipment and additional technological solutions to reduce corona noise levels during rainy weather conditions. To verify the efficiency of the corona noise reduction equipment, the applicant will measure operational noise levels at sensitive residential receptors located within 45 feet from the proposed 230-kV line segments during three rain events during the first two rainy seasons when the 230-kV line is operating. Monitoring reports shall indicate the existing ambient noise levels and weather conditions during measurements. The applicant shall conduct noise level measurements in compliance with the City of San Juan Capistrano and City of San Clemente requirements, as applicable. The applicant will submit results of the monitoring to the CPUC annually. If the monitoring reports determine that the corona noise levels exceed 45 dBA at sensitive residential receptors located within 45 feet, the applicant will implement additional technological solutions and installation equipment and will repeat the measuring of operational noise levels at sensitive residential receptors located within 25 feet of the proposed 230-kV line segments during three rain events during the subsequent two rainy seasons, until the 45 dBA threshold is no longer exceeded during rain events.	Remove entire mitigation measure.





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125.	Table 8-1	8-41	MM PS-1	Language should mirror language included for MM PS-1 in Section 4.13.4. Add additional language as shown.	<b>MM PS-1: Water Efficiency Plan.</b> The applicant will make reasonable attempts to reduce overall water use and will reduce potable water use by at least 20 percent during drought conditions, as declared by the State of California. The applicant will be required to research reclaimed water sources and acquire reclaimed water to the greatest extent practicable. The applicant will prepare and submit a Water Efficiency Plan to the California Public Utilities Commission (CPUC) for review and approval at least 60 days prior to construction. The Water Efficiency Plan will detail the applicant’s water efficiency measures, including the use of reclaimed water, palliatives, alternative construction methods, or other measures proposed.	<b>MM PS-1: Water Efficiency Plan.</b> The applicant will make reasonable attempts to reduce overall water use and will reduce potable water use by at least 20 percent during drought conditions, as declared by the State of California. The applicant will be required to research reclaimed water sources and acquire reclaimed water to the greatest extent practicable. The applicant will prepare and submit a Water Efficiency Plan to the California Public Utilities Commission (CPUC) for review and approval at least 60 days prior to construction. The Water Efficiency Plan will detail the applicant’s water efficiency measures, including the use of reclaimed water, palliatives, alternative construction methods, or other measures proposed. <u>In the event that a sufficient supply of reclaimed water cannot be reasonably obtained, the applicant will provide a well-documented justification for any use of potable water to be used for construction activities. If, at any time during construction, the State Water Resources Control Board (SWRB) rescinds their Emergency Regulations (Resolution No. 2014-0038) due to a cessation of drought conditions in the state, the applicant may request that the CPUC rescind this mitigation measure. Alternatively, the applicant will need to revise their Water Efficiency Plan to remain in compliance with future adopted SWRCB regulations regarding water use during drought conditions.</u>
126.	Table 8-1	8-41	MM PS-1	Timing inconsistent with measure language.	Prior to and during construction and restoration.	<u>60 days prior to construction.</u>





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127.	Table 8-1	8-45	MM TR-3	MM TR-3 requires unnecessary notification prior to helicopter operations, and incorrectly requires advance notice for emergency operations. By definition, advance notice cannot be given for emergency operations. Advance notification for emergency operations is infeasible. The mitigation measure should also be clarified to require notification for only low-flying helicopter operations along the project alignment. Notifications from the point of origin to the project location is unnecessary, and extremely costly and burdensome during construction. The mitigation measure also makes references to Southern California Edison, which should be changed to San Diego Gas and Electric.	<b>MM TR-3: Notification and Monitoring of Helicopter Use.</b> SDG&E will notify the Long Beach Flight Standards District Office at least one week in advance of all days during which helicopter operations are planned to occur or as required by the Flight Standards District Office. In addition, SDG&E will notify all residents, businesses, and owners of property within 0.25 miles of planned or emergency helicopter flight paths and landing areas at least one week in advance of all days during which helicopter operations are planned to occur. In compliance with 14 CFR Part 133, the loading and unloading of all helicopter external loads shall be monitored by lineman (non-apprentice) certified by Southern California Edison to rig and inspect helicopter external loads. All accidents or incidents reported to the NTSB or FAA shall, at the same time of reporting, be reported to the CPUC. Near misses involving helicopters that had the potential to result in an accident or incident as defined by the NTSB but do not require NTSB notification, shall be entered and described on a dated record by Southern California Edison and immediately reported to the applicant’s safety coordinator and the CPUC.	<b>MM TR-3: Notification and Monitoring of Helicopter Use.</b> SDG&E will notify the Long Beach Flight Standards District Office at least one week in advance of all days during which helicopter operations are planned to occur or as required by the Flight Standards District Office. In addition, SDG&E will notify all residents, businesses, and owners of property within 0.25 miles of planned <del>or emergency</del> helicopter flight paths and landing areas <u>along the Project alignment</u> at least one week in advance of all days during which helicopter operations are planned to occur. In compliance with 14 CFR Part 133, the loading and unloading of all helicopter external loads shall be monitored by lineman (non-apprentice) certified by <del>Southern California Edison</del> <u>San Diego Gas &amp; Electric Company</u> to rig and inspect helicopter external loads. All accidents or incidents reported to the NTSB or FAA shall, at the same time of reporting, be reported to the CPUC. Near misses involving helicopters that had the potential to result in an accident or incident as defined by the NTSB but do not require NTSB notification, shall be entered and described on a <del>dated</del> record by <del>Southern California Edison</del> <u>San Diego Gas &amp; Electric Company</u> and immediately reported to the applicant’s safety coordinator and the CPUC.





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In Reply Refer To:  
FWS/CDFW-13B0124-15CPA0217

APR 24 2015

Mr. Andrew Barnsdale  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102-3298

Subject: Comments on the Draft Environmental Impact Report for the South Orange County Reliability Enhancement Project, Orange County, California (SCH#2013011011)

Dear Mr. Barnsdale:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the Draft Environmental Impact Report (DEIR) for the South Orange County Reliability Enhancement Project (SOCRE) dated February 23, 2015. The comments and recommendations provided herein are based on the information provided in the DEIR, our knowledge of sensitive and declining vegetation communities in the region, and our participation in San Diego Gas and Electric's (SDG&E) Subregional Natural Community Conservation Plan/Habitat Conservation Plan (Subregional NCCP/HCP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. SDG&E currently participates in the NCCP program by implementing its approved SDG&E Subregional NCCP/HCP.

The purpose of the proposed SOCRE project is to increase the reliability and operational flexibility of the SDG&E South Orange County 138-kilovolt (kV) system to reduce the risk of electrical outages. The project includes upgrading SDG&E's San Juan Capistrano and Talega substations; the construction of a new double-circuit 230-kV transmission line (approximately 7.8 miles long) from the San Juan Capistrano Substation to the Talega Substation, within an existing transmission line corridor; the relocation of several transmission line segments (approximately 1.8 miles, total) adjacent to Talega and San Juan Capistrano substations, to accommodate the proposed expansion of the San Juan Capistrano Substation and new 230-kV line; and the relocation of several 12-kV




distribution line segments (approximately 6 miles) into underground conduit and overhead on existing and new structures located between the San Juan Capistrano Substation and Prima Deschecha Landfill. In addition SDG&E will acquire approximately 9.97 acres of new right-of-way along 0.3 mile of new transmission line corridor within the Talega Hub/Corridor area west of the Talega Substation. SDG&E estimates that construction will take approximately 64 months.

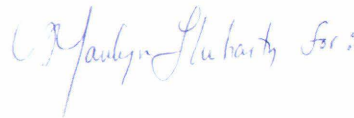
The proposed project is anticipated to permanently impact 1.59 acres and temporarily impact 2.01 acres of coastal sage scrub, and permanently impact 2.42 acres and temporarily impact 8.42 acres of non-native grassland. Species found within the survey area include the State and federally endangered southwestern willow flycatcher (*Empidonax traillii extimus*) and least Bell's vireo (*Vireo bellii pusillus*) and the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher). The federally endangered arroyo toad (*Anaxyrus californicus*) was not documented during project-specific surveys, but has been documented within the survey area in the past (Cadre 2013). In addition, the proposed project is anticipated to permanently impact 0.25 acre and temporarily impact 1.01 acres of arroyo toad designated critical habitat, and permanently impact 2.28 acres and temporarily impact 3.94 acres of gnatcatcher designated critical habitat.

The Wildlife Agencies offer the following comments and recommendations (enclosure) to assist the California Public Utilities Commission (CPUC) in avoiding or minimizing potential project impacts on biological resources. We appreciate the opportunity to comment on the DEIR. If you have questions regarding this letter, please contact Patrick Gower (Service) at (760) 431-9440 extension 352 or Eric Hollenbeck (Department) at (858) 467-2720.

Sincerely,



 Karen A. Goebel  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service



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

Enclosure

#### Literature Cited

Cadre. 2013. 2012 Status Report-Five Year Arroyo Toad Radio Telemetry/Pitfall Trapping Upland Habitat Characterization Pattern Study Adjacent to Planning Area 8 within Rancho Mission Viejo, Orange County, California. Rancho Mission Viejo, January 8, 2013.



**Enclosure**  
**Comments on the Draft Environmental Impact Report for the South Orange County**  
**Reliability Enhancement Project, Orange County, CA**

1. The Final EIR (FEIR) should include a figure that shows the location of the proposed 9.97 acres of new rights-of-way detailed in Section 2.3.5.1.
2. Table 4.4-1 in the DEIR indicates that surveys for sensitive species have not been completed for the 12-kV Distribution line. The FEIR should require completion of these surveys before the onset of project impacts to identify sensitive species present; SDG&E should then coordinate with the Wildlife Agencies to ensure that potential impacts to sensitive species are avoided and minimized to the maximum extent practicable consistent with the SDG&E NCCP/HCP.
3. The DEIR outlines the use of helicopters in section 2.4.6, page 2-61. Because helicopters produce an effect commonly referred to as “rotor wash,” which emulates extreme wind conditions that vary based on the size of the helicopter and the proximity to the receptor, the Department recommends the CPUC identify sensitive biological receptors (e.g., avian nesting) within the FEIR. The FEIR should include a mitigation measure that establishes a three-dimensional biological buffer between helicopter activities and all sensitive biological receptors as determined by a qualified biologist. A system should be developed for the biological monitors to effectively convey the buffers to the CPUC, the Wildlife Agencies, and helicopter pilots. The helicopters should be equipped with global positioning sensors that will be used by SDG&E to ensure compliance with established buffers. Any incursions should be reported to the CPUC and the Department. The DEIR specifies the use of three classes of helicopters, totaling approximately 168 hours of rotor time. The DEIR does not specify how many hours of rotor time are anticipated for each class of helicopter. Because each size or class of helicopter has a different level of disturbance associated with it that can be used as a rough-step scale in determining future biological buffers (e.g. nests), the Department recommends that the FEIR provide preliminary estimates of the rotor hours for each type of helicopter. Actual hours should be reported to the CPUC. Given the potential biological impacts associated with helicopter use, including nest failures due to rotor wash, the Wildlife Agencies recommend that helicopter use be limited to operations where a clear net benefit to sensitive biological resources is proposed. As an example, in remote areas where current access routes are not available, helicopters have been used to deliver materials without requiring additional habitat disturbance associated with new access roads. This in turn limits future access and disturbance associated with recreation.
4. The DEIR states that special status plant species were considered unlikely to occur based on three main criteria which rely heavily on the California Natural Diversity Database (CNDDB). While the Department recognizes the CNDDB as a very powerful and useful tool, it is a positive occurrence database. Because a positive occurrence database only reports current survey information, there may be gaps in cumulative survey effort relevant to the current project. The DEIR states that some species were excluded due to a lack of CNDDB records, old CNDDB records, or habitat patches being small, degraded, or isolated. Although it may potentially be valid to exclude degraded habitat, this document does not define degraded habitat, and some special status species such as southwestern willow flycatcher and



arroyo toad may still occur in degraded habitat. For these reasons, the Department does not recommend reliance on these factors for determining species presence or habitat suitability.

5. Many of the focal surveys identified in the DEIR were completed in 2010. Southwestern willow flycatcher has been in decline in southern California in recent years<sup>1</sup>, so we recommend completing updated surveys for this species to inform efforts to avoid and minimize potential impacts to breeding territories for this species consistent with the SDG&E NCCP/HCP. In addition, the Wildlife Agencies recommend completing updated surveys for all State and federally listed species within areas not covered under the NCCP/HCP (i.e., U.S. Army Corps of Engineers [Corps] jurisdictional areas). Avoidance and minimization of impacts to sensitive habitats, sensitive species, and isolated populations should be given careful consideration because the severity of an impact may be exacerbated by the current climate.
6. Figure 4.4.3 should include all preserves (e.g., Forester Ranch, Talega, Reserve at Rancho Mission Viejo), conserved areas, and open space areas. The DEIR (page 4.4-45) states that discrepancies among publicly available data prevent an accurate estimate of the impacts within existing conserved areas or visually depicting the impacts to conserved areas. The Wildlife Agencies recommend that the FEIR contain an analysis based on any available or additional information in order to fully enumerate the referenced impacts. We will work with you to ensure that you have the approximate boundaries for the areas in question to include figures and estimated impacts to preserves, conserved areas, and open space areas in the FEIR; the Service will provide you with Graphic Information System files and other supporting documentation.
7. Based on our review of the DEIR, the Wildlife Agencies request additional coordination with SDG&E to determine if the project will result in impacts that are in conflict with existing conservation easements. If such impacts are anticipated, we request additional coordination among SDG&E, the Wildlife Agencies, the easement holder(s), and CPUC with the goal of modifying the project to avoid potential impacts to areas anticipated to be permanently protected. If such impacts cannot be avoided, additional coordination with the easement holders will be necessary to discuss a process for addressing the anticipated impacts in a manner that does not compromise existing conservation plans.
8. The DEIR states that Preserve areas, "...include existing reserve or conservation areas established by regional planning documents..." (page 4.4-48). The Wildlife Agencies recommend the FEIR clearly state that all areas denoted as moderate, high, and very high quality habitat will be subject to mitigation as if they are part of an existing reserve or conservation area, consistent with the SDG&E Subregional NCCP/HCP (Section 6, SDG&E Activities within Habitat Conservation Plan Preserves).
9. Section 4.4.3.3 of the FEIR should include a figure that shows the portions of the project that occur within designated arroyo toad and gnatcatcher critical habitat overlain on an aerial

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<sup>1</sup> U.S. Fish and Wildlife Service. 2014. Southwestern willow flycatcher (*Empidonax traillii extimus*) 5-year review: Summary and evaluation. Arizona Ecological Services. Phoenix, Arizona. August 15, 2014.



photograph with vegetation communities, locations of sensitive species, and proposed permanent and temporary impacts.

10. Mitigation Measure MM BR-6 of the DEIR indicates that active bird nests will not be removed, “unless the project is expressly permitted to do so by the USFWS or CDFW.” Migratory nongame native bird species are protected under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations) and sections 3503, 3503.5, and 3513 of the California Fish and Game Code which prohibit take of all migratory birds, including raptors and other nongame birds and their nests. There is no authority for the Department to permit such an activity, and the Service only authorizes take under MBTA in emergency situations involving imminent loss of life or property. The Wildlife Agencies recommend buffer reductions for special status species be implemented as appropriate in accordance with the approved plan as noted in MM BR-6 in coordination with the Wildlife Agencies.
11. Mitigation Measure MM BR-1 of the DEIR restricts vehicular traffic in project locations to established construction areas. The Wildlife Agencies recommend that the FEIR specify that use of disturbed or low habitat value areas be given priority over undisturbed or higher habitat value areas that are otherwise permitted for impacts. MM BR-1 also specifies that if the applicant is unable to maintain a 50-foot exclusionary buffer from jurisdictional wetland features, the applicant will submit best management practices to the CPUC for review and approval. Currently, impacts to Corps jurisdictional wetlands are not covered under the SDG&E Subregional NCCP/HCP. As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use or deposit material from a streambed. The Wildlife Agencies recommend SDG&E notify the Corps and the Department regarding potential impacts to streams or wetlands.
12. The Wildlife Agencies recommend MM BR-2 be revised in the FEIR to require monthly monitoring reports for review to be submitted to the CPUC and the Wildlife Agencies. Unauthorized or unexpected impacts to listed species that occur as a result of this project should be reported to the Wildlife Agencies and the CPUC within 48 hours.



1 alternatives that will not support south county the way  
2 we need it supported in small business. By the way, the  
3 things I approve about are the ones that were made by  
4 SDG&E, not by the people that are providing alternatives.

5           Electricity supports our business and helps us  
6 survive and thrive as a small business owner. We do our  
7 part to conserve energy. We try to reduce the use of our  
8 electricity, but it's not about the amount of power we  
9 use but it's really, in my opinion, about the redundancy  
10 of the electrical system. That's a key. The three  
11 objectives, as I said, stated by SDG&E, I think, are both  
12 practical and needed from a business perspective. And I  
13 hope that the final decision that's made are not by  
14 people who do not live here and have to abide by the  
15 rules that cap them.

16           With that in mind, finally, a reliable  
17 transmission system depends on South Orange County  
18 Reliability Enhancement project proposed by SDG&E, and I,  
19 my wife and other small businesses approve and want to  
20 support this project. Thank you.

21           BONNY O'CONNOR: Thank you. Next we have Larry  
22 Thomas.

23           LARRY THOMAS: Again, thank you for the opportunity  
24 to speak. My name is Larry Thomas. I'm with  
25 Independence, chair the board of San Juan Capistrano

1 Chamber of Commerce. I'm also senior vice president and  
2 regional banking manager for South Orange County for  
3 Partners Bank. I reside, coincidentally, in Talega,  
4 almost directly -- well, I am directly adjacent to,  
5 almost under, the transmission lines of the proposal  
6 here.

7           The San Juan Capistrano Chamber of Commerce  
8 has considered this project for some time now and has  
9 determined that the Chamber fully supports it. A  
10 detailed letter to that effect actually has been sent to  
11 the Commission. Reliable electric power is critical to  
12 the economic health and the spirit of businesses in the  
13 city of San Juan Capistrano as well as throughout the  
14 entire South Orange County area.

15           As a local banker, I've had to deal with  
16 several unplanned outages over the years. Loss of  
17 electricity puts financial institutions and many other  
18 enterprises out of business. We rely heavily on electric  
19 power and technology to do our day-to-day tasks. That  
20 means banks can't do transactions, ATMs won't work,  
21 merchants can't process credit card transactions, gas  
22 pumps don't work, and on and on.

23           We recognize that there will be some temporary  
24 traffic and air quality issues resulting from this  
25 project; however, the recently released EIR concludes



1 that these impacts are limited to the construction phase.  
2 With that in mind, we urge this Commission to approve the  
3 permanent solution and to avoid another construction  
4 project with related impacts with the additional  
5 infrastructure improvements that are needed in a few  
6 years. Let's solve this problem now. It's cheaper and  
7 less impactful in the long run.

8 BONNY O'CONNOR: Next is Jim Leach.

9 JIM LEACH: Thank you very much for coming down.  
10 I'm Jim Leach. I'm here on behalf of the Santa Margarita  
11 Water District.

12 We are in support of the San Diego Gas and  
13 Electric Company South Orange County Reliability project  
14 as it's proposed.

15 We're the water provider for 155,000 South  
16 Orange County residents and businesses. Water districts,  
17 for better or worse, are in the top use of electrical  
18 power, an essential component in our system that not only  
19 delivers water to customers but captures run-off and  
20 sewage and recycle and reuse millions of gallons of  
21 water. Santa Margarita is keenly aware of the necessity  
22 of reliable power to ensure the reliability of our  
23 service to our customers.

24 SDG&E provides primary power to 72 critical  
25 water facilities that are a part of our system. The

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22 of reliable power to ensure the reliability of our  
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24 SDG&E provides primary power to 72 critical  
25 water facilities that are a part of our system. The



1 Chiquita Water Reclamation Plant, the 3A Wastewater  
2 Treatment Plant, the J.B. Latham Treatment Plant, the Oso  
3 Creek Water Reclamation Plant as well as dozens of pumps  
4 and those stations are all served by SDG&E in its  
5 footprint of this proposed project.

6           In keeping with our responsibility for water  
7 system reliability, we've installed energy-efficient  
8 elements in all of our facilities as well as significant  
9 backup power. At the same time we believe that SDG&E, as  
10 our primary source of power, must have advanced  
11 capability commensurate to these and the demands of our  
12 growing area. It also needs system redundancy to ensure  
13 reliability of their system and ours. It's our view that  
14 an upgraded system to the capacity of the system is in  
15 order given our growth and the loss of San Onofre  
16 facility. A secondary substation to service SDG&E's 220  
17 kilovolt transmission line is critical for the redundancy  
18 that's needed in our communities and a higher plan.

19           We believe that shed load should not be a part  
20 of any plan that's recommended by the CPUC for dealing  
21 with the power requirements of the area. While we  
22 understand and appreciate the efforts that the CPUC has  
23 taken to ensure the minimization of the environmental  
24 impact, SDG&E has shown the proposed project has minimal  
25 impact and then only during the construction period.

1 More important are the maximum ongoing benefits of the  
2 project.

3 We encourage the CPUC board to approve the  
4 SDG&E South Orange County Reliability Enhancement project  
5 as proposed. Thank you very much.

6 BONNY O'CONNOR: Heather Baez.

7 HEATHER BAEZ: I'm Heather Baez. I'm a  
8 representative for Municipal Water District of Orange  
9 County. As soon as I started working there I realized  
10 people don't have any concept of where their water comes  
11 from or how it gets here.

12 While we do rely on gravity to an extent, we  
13 also rely on electricity to pump our water for service  
14 area. And Jim Leach touched on a lot of the different  
15 facilities that are needed that require electricity; so I  
16 won't go into that. But the last huge power outage we  
17 had in 2011 had severe repercussions in our area in the  
18 water when the sewage pump communications failed  
19 resulting in contaminated beaches and unsafe water supply  
20 in the areas. This event will not stop at local issues  
21 or demonstrate impacts that mature if we are not diligent  
22 in investing in our future infrastructure needs such as  
23 SDG&E's proposed reliability project.

24 The Municipal Water District of Orange County  
25 directly imported water for Orange County residents for



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1 28 service areas such as Santa Margarita, South Orange  
2 County or South Coast Water District, city of San  
3 Clemente and city of Capistrano, and we strongly  
4 encourage your support of SDG&E's proposed reliability  
5 project. We've already submitted a written letter in  
6 that regard.

7 Water supply reliability is our simple  
8 mission, which requires having a reliable electrical  
9 power grid which one can treat and recycle our water  
10 supply. What this means is that the Municipal Water  
11 District of Orange County --

12 SDG&E's electrical customers deserve smart  
13 investment and reliability such as this electrical  
14 reliability project.

15 BONNY O'CONNOR: Victor Cao.

16 VICTOR CAO: Good afternoon. My name is Victor Cao.  
17 I represent Supervisor Lisa Bartlett who is on the Orange  
18 County Board of Supervisors. She represents over 11  
19 cities and unincorporated areas. It's about 600,000  
20 residents. It's the equivalence of filling over 13  
21 baseball stadiums, if you want to put that in  
22 perspective. The Supervisor governs at the local level  
23 as well as the regional perspective on multiple areas --  
24 construction, fishing, water quality. So if you look  
25 into the detail --



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21 baseball stadiums, if you want to put that in  
22 perspective. The Supervisor governs at the local level  
23 as well as the regional perspective on multiple areas --  
24 construction, fishing, water quality. So if you look  
25 into the detail --

1           The supervisor is in full support of the South  
2 Orange County Reliability Enhancement project to provide  
3 safe and reliable power and most importantly a redundant  
4 transmission system.

5           Let's talk about Orange County. We're the  
6 third most populated county. We have an anticipated  
7 growth spurt in Orange County of 28,000 people in this  
8 county, actual Orange County residents. The great thing  
9 about Orange County is that we can plan communities. We  
10 need to invest in this now in order to plan for the  
11 future and this is an investment in our future.

12           So we're also looking into, in terms of  
13 consideration, our business community, our water,  
14 hospitals, public safety, we take that in full  
15 consideration and we still stand by its competence. Our  
16 partnership with San Diego Gas and Electric is both a  
17 process -- it is also we need to regulate time, place --  
18 they kind of create each other.

19           Now speaking for some of the alternates about  
20 shedding load, the issue for shedding load is that, well,  
21 the state of California is below the national average.  
22 The per capita energy consumption per person is 7,000  
23 kilowatts an hour. The national average is about 12,000  
24 or more an hour. This is why we stand by the project.  
25 So thank you so much for your time.



1           BONNY O'CONNOR: Is the transcriptionist being able  
2 to get everything?

3           THE REPORTER: No. That last speaker was difficult  
4 to hear.

5           BONNY O'CONNOR: I would like to remind everybody  
6 that you've got to get close to the microphone.

7                       Next is John Ozurovich.

8           JOHN OZUROVICH: Good afternoon. I'm John  
9 Ozurovich, Senior Director at the facility at Saddleback  
10 College. I'm representing our college to voice support  
11 for the South Orange County Reliability Enhancement  
12 project as proposed by SDG&E.

13                       Saddleback College has over 25,000 students,  
14 and electrical reliability is critical to the successful  
15 delivery of our educational programs. Each time we lose  
16 power there is a tremendous disruption to our educational  
17 process, a significant expenditure of public resources to  
18 reinstate the operation of the campus, and potential loss  
19 of laboratory studies due to the interruption in power.  
20 In addition, campus safety systems are compromised; all  
21 buildings are evacuated; notification of 25,000 students  
22 is needed to let them know the status of the campus; we  
23 have to initiate building fire watches, and we have to  
24 restore all of our computers and servers throughout the  
25 campus; also, there is tremendous traffic gridlock when

1 businesses and millions of seasonal visitors traveling in  
2 South Orange County. Actually, we were somewhat  
3 surprised that the CPUC staff did not recommend the SDG&E  
4 project as its preferred alternative.

5           Second, temporary environmental impacts during  
6 that short-term construction project, CPUC staff ignored  
7 our long-term benefits of the project in favor of their  
8 recommendations and minor upgrades that do not address  
9 the glaring absence of the redundant electrical  
10 transmission system.

11           I urge you to consider the needs of our  
12 community and all the residents of South Orange County  
13 for reliable power and redundant system. Please support  
14 San Diego Gas and Electric's proposed South Orange County  
15 Reliability Enhancement project.

16           BONNY O'CONNOR: Next is Garry Brown.

17           GARRY BROWN: Thank you for the opportunity to  
18 speak. My name is Garry Brown. I am the founder and  
19 president of Orange County Coastkeeper and the Inland  
20 Empire Waterkeeper. Our mission is swimable, fishable,  
21 drinkable and sustainable water, and we deal in all the  
22 surrounding areas to ensure and promote that.

23           You may not realize it that, you know, when we  
24 have a power outage there is a number of things, a lot of  
25 inconvenience, a lot of difficulty that happens. A lot



1 of the things that maybe you don't realize is, we have --  
2 and it has happened many times, when power goes out,  
3 pumps shut down and we seem to have a sewage spill. And  
4 that was the case on September 8, 2011 when 2.5 million  
5 gallons of sewage spilled. It's not an isolated thing.  
6 It happens repeatedly. In the 18 years since I started  
7 Coastkeeper there's been numerous power outages in  
8 various areas, and it seems like there's always a result  
9 in sewage spill or raw sewage in our waterways. And what  
10 about the emergency generator? I remember an example of  
11 when we really need them, they don't work. We had a 13  
12 million gallon sewage spill in Orange County some years  
13 ago where not only there was a power outage, then the  
14 backup methane electrical system failed, then the power  
15 generators failed, the emergency generators failed, and  
16 even the emergency pond to put sewage in, they were  
17 reconstructing it and had trucks in it. So the ocean got  
18 about 13 million gallons of raw sewage that all started  
19 from a power outage.

20           We all look at facts and we try to balance  
21 everything. What's the good; what's the bad? I'm  
22 finding it difficult to see how short-term inconvenience  
23 outweighs long-term serious problems and the other issues  
24 that happen from a power outage.

25           So the redundancy of this project and what

1 goes into the system, I think, is incredibly important to  
2 the area and we certainly will support and ask to support  
3 for the approval of this project as it's proposed. Thank  
4 you.

5 BONNY O'CONNOR: Next one is Lou Penrose. Is Lou  
6 here?

7 AUDIENCE MEMBER: No. He had to leave.

8 BONNY O'CONNOR: No Lou? Okay. Debbie Newman.

9 DEBBIE NEWMAN: As she said, my name is Debbie  
10 Newman. I am president and CEO of the Laguna Niguel  
11 Chamber of Commerce.

12 On behalf of the business community and the  
13 greater of Laguna Niguel area, the Board of Directors of  
14 the Laguna Niguel Chamber of Commerce fully supports  
15 SDG&E's SOCRE project as has been proposed.

16 Our businesses need reliable electrical  
17 energy. SDG&E's proposed project meets those needs. The  
18 Draft EIR indicated only a few environmental impacts  
19 related to the project, and those impacts were only  
20 during the construction phase. A few short-term  
21 environmental impacts should not keep the CPUC from  
22 approving SDG&E's project as proposed.

23 The Laguna Niguel Chamber of Commerce asks you  
24 to approve SDG&E's proposed project. Thank you for your  
25 consideration.



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24 to approve SDG&E's proposed project. Thank you for your  
25 consideration.

1           BONNY O'CONNOR: Rick Erkeneff.

2           RICK ERKENEFF: For the record, you're not the first  
3 person to do that. It's Rick Erkeneff. I am a Orange  
4 County native. I've made a couple passes through the  
5 community and they have watched, witnessed explosive  
6 growth of southern Orange County. I am also Surfrider  
7 Foundation Chairman for South Orange County. And as some  
8 of the other speakers have mentioned, sewage spills,  
9 that's one of the top of our list to prevent. I also am  
10 elected to South Coast Water District and I am the vice  
11 president of the water district.

12                   Our board president did submit a letter to the  
13 California Public Utilities Commission in full support of  
14 this project as proposed. And I would also like to add  
15 to the record that wasn't in this letter, our agency, our  
16 district, along with other partners in the area, are  
17 really looking to the future of water and power supply.  
18 We have a desalination effort at Doheny State Beach that  
19 will require a tremendous amount of energy, and going  
20 into the future, this project will help ensure that we  
21 have the energy that we need to produce our local water.

22                   So I'll keep it short and sweet with that and  
23 say that I hope that the Public Commission approves this  
24 project as presented. Thank you.

25           BONNY O'CONNOR: Next we have Mike Burke.



1           MIKE BURKE: Thank you. I'm Mike Burke, and I'm  
2 Chairman of the board of the San Clemente Chamber of  
3 Commerce. I'm here to speak on behalf of the Chamber in  
4 supporting this project as proposed by SDG&E.

5           As you've heard several horror stories, I'm  
6 sure everyone in this room has stories of what happened a  
7 few years ago when we lost power. And it's something  
8 that the systems and societies have to keep in touch with  
9 the needs of the people and we're in a modern  
10 industrialized world. So I think that putting a priority  
11 on this project in place was critical.

12           Our chamber have members that are large and  
13 small and every one of them is seriously disrupted when  
14 we don't have power. Yes, we recognize there are some  
15 temporary impacts that go along with the program, having  
16 viewed the nature of the impacts in the environmental  
17 impact report. Summarizing that up -- I didn't read the  
18 whole thing. It's pretty apparent to me that it's an  
19 obvious great opportunity. The level of mitigation that  
20 was done and the project that is being proposed is  
21 certainly worth the inconvenience of the temporary  
22 impacts.

23           My interest is to urge the CPUC to approve the  
24 project as proposed by SDG&E, and I think it will be  
25 something that is needed. It's something that is long

1 overdue and should be taken care of as soon as it can be  
2 done.

3           Just as a side note, I was in the  
4 environmental review business for 38 years, and it's  
5 still confusing to me, the process you go through. So  
6 I'm trying to understand the process. There's absolutely  
7 a lot of complexity in the process that you are going  
8 through. Thank you.

9           BONNY O'CONNOR: Joe Anderson.

10          JOE ANDERSON: Good afternoon. I'm Joe Anderson.  
11 My wife and I have been residents of the SDG&E service  
12 area here since 1976. That's over 40 years here.

13           But anyhow, I co-chair an organization called  
14 Citizens for Safe and Reliable Power in the South Orange  
15 County area, and we are in support of the project. Our  
16 organization is all volunteer. It's comprised of a few  
17 former politicians like myself, which I'll speak to in a  
18 moment, a business staple and citizens. During our time  
19 in San Clemente, I ran for city council for 16 years and  
20 served three terms as our mayor; so I also have read our  
21 fair share of EIRs.

22           This project is really needed. We're talking  
23 about reliability. We're talking about an area, a huge  
24 area in terms of population that is dependent upon one  
25 substation, that being Talega. If it goes down, we're



1           On a personal level, I too have one, which I  
2 will quickly address. My wife has advanced COPD, is  
3 dependent upon oxygen and a ventilator in our home. When  
4 this power outage went out, which I thought was in 2012  
5 but maybe it was 2011. Fortunately, we have a motorhome  
6 at home and I ran our house -- well, not our house, but  
7 all of her equipment off the generator from that  
8 motorhome from about 5 o'clock in the afternoon until  
9 about 2 or 3 in the morning. I left a few lights on so  
10 I'd know when to go out and shut off the motorhome. But  
11 without that, I'd have to take her to the hospital, I  
12 guess. And you know, ICU is \$7,500 a day.

13           So, you know, we need a realistic, up-to-date,  
14 modern electrical system here in San Clemente. Thank you  
15 very much.

16           BONNY O'CONNOR: Next we have Jim Bieber.

17           JIM BIEBER: Good afternoon. My name is Jim Bieber,  
18 and I'm a resident of San Clemente and I own a supply  
19 office up the street. In between my house and the center  
20 here are two properties that we own that are full-time  
21 vacation rental homes, just two streets over, built in  
22 1926. You know, it's total rehab we had to do, and I'm  
23 very familiar with the process of renovating a historical  
24 home and undergoing compliance with a variety of things,  
25 including electricity, and weighing the balance of

1 safety, what's historical, what's important, and what's  
2 just practical.

3           We have a couple folks mention the great  
4 outage of 2011. And where our particular neighborhood is  
5 it was great. The lights went out. The TV went out. We  
6 were out on the balcony. Kids were running up and down  
7 our streets with flashlights. Thirty-one Flavors was  
8 giving away free ice cream. Then I called my buddy in  
9 San Juan Capistrano, John Schrab of Schrab Marble and  
10 Tile.

11           I say, "Hey, John, get off work early. Come  
12 on over. We're having a party in the neighborhood."

13           He goes, "Are you out of your mind? I'm  
14 losing my shirt. I've got two trucks out there I can't  
15 fuel. I've got these orders going on. I'm losing  
16 thousands."

17           So the perspective is, how many people are  
18 going to be hurt if this happens again? The question is,  
19 is it necessary? Absolutely. Is the next city that's  
20 going to need help San Juan Capistrano -- as you'll see  
21 this monstrosity of a strip mall right off the 5 that's  
22 going to be sucking energy like crazy.

23           This project is really thoughtful. Again,  
24 taking it back to our own experience of rehabbing a  
25 building from 1926 and complying and making sure that



1 it's historic and it's safe. And as some folks -- and,  
2 you know, that was funny I was just at the Swallows Day  
3 Parade with my daughter in San Juan Capistrano. I didn't  
4 quite see the substation that people are clamoring about,  
5 but I've seen it before. And there's a real difference  
6 between something that's cool, historical and working,  
7 significant and historical, and something that is just an  
8 old building. And there's a battle that seems to be fit.  
9 And this project is so well thought out that they went  
10 over designs, and public reviewed -- I guess if it was  
11 something right in front of my house, I'd complain. You  
12 know, I realize that's actually -- but it's going to be  
13 quick. It's going to be a thoughtful process, and  
14 everybody is going to benefit from it.

15 So with that said, I accept the project.

16 BONNY O'CONNOR: Next is Steve Lamotte.

17 STEVE LAMOTTE: Well, thank you for coming down to  
18 Orange County. Hopefully you're enjoying yourself.

19 My name is Steve Lamotte. I'm Director of  
20 governed affairs for the Building Industry Association of  
21 Orange County. The Building Industry Association, Orange  
22 County Chapter is a nonprofit association. Nearly 1000  
23 companies employing over 100,000 people. With the Orange  
24 County chapter is the largest in the history of southern  
25 California region.

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25 California region.



1           You can imagine how surprised we were to learn  
2 that in the previous analysis CPUC staff did not  
3 recommend the project as proposed, instead turned in a  
4 conclusion to shedding load or shutting off some power  
5 for the region recommended to the Commissioners to  
6 consider. For the home building industry this is a  
7 serious concern. I'm sure you can imagine reliable  
8 electricity is a key importance to building homes. While  
9 we recognize the Draft EIR indicates there will be  
10 temporary significant impacts to air quality as well as  
11 traffic, all of those impacts will occur during the  
12 construction project and do not carry over for a  
13 long-term effect. As a representative of the building  
14 industry, we work hard to ensure to minimize  
15 construction-related environmental impact. Most  
16 regulatory agencies recognize that many during  
17 construction are just unavoidable.

18           The BIAOC will encourage the CPUC Commisioners  
19 to consider the long-term benefits of building a power  
20 reliability project with upgraded and modernized  
21 equipment. We hope Commissioners understand that these  
22 methods greatly outweigh the temporary impacts that occur  
23 during the construction of this needed electrical  
24 infrastructure project. Thank you.

25           BONNY O'CONNOR: Nancy, I'm sorry. I can't read

1 we really afraid to give the big picture and globally do  
2 the right thing -- and, actually, it's not even global.  
3 It's just obviously the right thing. Just ignore the  
4 alternatives of the EIR, and I urge you to not adopt  
5 those and to assess and support SDG&E's proposed South  
6 Orange County Reliability Enhancement program.

7 BONNY O'CONNOR: Next Rhonda Reardon.

8 RHONDA REARDON: I hope you enjoyed that little girl  
9 walking in her heels. This was not the plan to have my  
10 granddaughter with me here today. So I think it's two of  
11 us today.

12 Thank you gentlemen for coming down. I want  
13 to talk about a couple things. I agree with this  
14 gentleman, Mr. Pearce. Thank you very much because you  
15 basically said everything that I was going to say. I am  
16 the former mayor of Mission Viejo. 2013 was my  
17 mayorhood. We had a significant power outage, three  
18 hours in the evening, at night; so it didn't seem to be  
19 that big of an impact, but it was. I also, in my former  
20 life, was a project manager, and I implemented projects,  
21 mostly technology projects. All of us in this room know  
22 that technology has changed vastly over the last several  
23 years. When I first started working on it, it was like  
24 every 18 months. Now it's even quicker than that.  
25 Quicker, faster and more. So the current infrastructure



1 that we have is not sufficient.

2 We ask -- and I'm asking on behalf of myself  
3 as a resident of Mission Viejo over 30 years, and as the  
4 former mayor, to please consider the fact that your  
5 alternatives that you offer in the Draft EIR, although  
6 they may have seemed reasonable, are not reasonable.  
7 Turning your power off is not going to work.

8 Just so you know, I didn't bring her, like I  
9 said, on purpose, but I will tell you, she expects us  
10 adults in this room to make wise and right decisions for  
11 her future, and that of all of our children and our  
12 grandchildren, and that is why I would ask you to think  
13 about the future, because even though we have enough  
14 power today, we may not have enough power this summer, we  
15 may not have it in two years or five years and this  
16 project I believe is very well thought out.

17 I appreciate SDG&E for spending the time that  
18 they have and the money to get public input all along the  
19 way. And I appreciate the fact that you are taking the  
20 time to come down and meet with us.

21 So, please, I support the project as a  
22 resident, as a former mayor of Mission Viejo, and I ask  
23 you to think about our future. Thank you very much.

24 BONNY O'CONNOR: Next is Wendy Bucknum.

25 WENDY BUCKNUM: I am Wendy Bucknum. I am a current