



CALIFORNIA PUBLIC UTILITIES COMMISSION

SAN DIEGO GAS & ELECTRIC SAN MARCOS TO ESCONDIDO TIE LINE (TL) 6975 69kV PROJECT

Final Initial Study/Mitigated Negative Declaration

January 2020

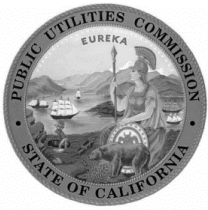


A.17-011-010
State Clearinghouse No. 2019049009

Prepared for:
California Public Utilities Commission

Prepared by:
Environmental Science Associates





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CHAPTER 1

Introduction

1.1 CEQA Process

Pursuant to the requirements of the California Environmental Quality Act (CEQA) and California Public Utilities Commission (CPUC) General Order (GO) 131-D, the CPUC prepared an Initial Study (IS) to evaluate potential environmental impacts of the application from San Diego Gas and Electric Company (SDG&E) (A.17-11-010) for a Permit to Construct (PTC) the proposed San Marcos to Escondido Tie Line (TL) 6975 69 kV Project (Project). The IS determined that the Project would not have a significant adverse effect on the environment, and the CPUC prepared a Draft Mitigated Negative Declaration (Draft MND).

This Final IS/MND has been prepared pursuant to CEQA and the CEQA Guidelines,¹ which outline all aspects of the preparation of the Draft IS/MND and its review, as well as the subsequent steps to preparing a Notice of Determination. This document incorporates comments received during the public review period, and contains responses by the Lead Agency (the CPUC) to those comments. The comments received resulted in minor changes to the IS contained in the Draft IS/MND, and some additional minor changes were made to improve the clarity of the Draft IS/MND. Those changes are reflected in Final IS/MND Chapter 3, *Revisions to the Draft IS/MND*, and Chapter 4, *Mitigation Monitoring, Reporting, and Compliance Program (MMRCP)*. Changes are shown using underline to denote new language, and ~~strike-through~~ to denote deleted language. The Final IS/MND provides corrections and clarity to certain facts set forth in the Draft IS/MND and, if necessary, ensures accuracy. No new significant environmental impacts are identified in this Final IS/MND.

Additionally, no mitigation measures presented in the Draft IS/MND were deleted in this Final IS/MND, however a few minor modifications were made to Mitigation Measures BIO-3, CUL-1, CUL-4, and NOI-1, as shown in Chapter 3 and Chapter 4 of this Final IS/MND.

The Final IS/MND is an informational document prepared by the CPUC to be considered by decision makers before approving or denying a proposed project. Consistent with CEQA Guidelines Section 15071, this Final IS/MND consists of the following:

- (a) A description of the Project (See Chapter 2, *Project Description*, of the Draft IS/MND in Appendix A);

¹ Public Resources Code Section 21000 et seq.; Title 14, California Code of Regulations, Chapter 3, Sections 15000 through 15387 and Appendices, accessible at http://ceres.ca.gov/topic/env_law/ceqa/guidelines/.

- (b) The location of the Project and the name of Project components (See Chapter 2 of the Draft IS/MND in Appendix A);
- (c) A finding that the Project would not have a significant effect on the environment (See Section 1.3, below);
- (d) An IS documenting reasons to support this finding, updated to address comments received on the Draft IS/MND published April 1, 2019 (See Chapter 3 of the Draft IS/MND in Appendix A, as amended by Final IS/MND Chapter 3, *Revisions to the Draft IS/MND*);
- (e) Mitigation Measures included in the Project to avoid potentially significant effects (see Final IS/MND Chapter 4, *MMRCP*).

1.2 Public Review Process

On April 1, 2019, the CPUC filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research (State Clearinghouse, SCH# 2019049009), published a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration, and released the Draft IS/MND for a 45-day public review period. The Draft IS/MND was distributed to federal, State, and local agency representatives, and the NOI was distributed to property owners within 600 feet of the Project and other interested individuals, as outlined in Appendix B of the Draft IS/MND. Legal notices appeared on April 1 and 8, 2019 in the *San Diego Union Tribune* and on April 4 and 11, 2019 in the *Times-Advocate* announcing the availability of the Draft IS/MND for public review in compliance with CEQA.

On April 25 and April 26, 2019, CPUC published legal notices of a 15-day extension of the public review period in the *Times-Advocate* and the *San Diego Union Tribune*, respectively. On May 3, 2019, the CPUC issued a notice to the State Clearinghouse regarding this extension of the public review period.

In addition to the 15-day extension of the public review period, the CPUC also held two public meetings on April 30, 2019 to give agencies, organizations, and individuals the opportunity to express any concerns or questions on the Draft IS/MND in a public setting. The first meeting occurred from 1:00 p.m. to 3:00 p.m. at the San Elijo Recreation Center in the Terrace Hall, located at 1105 Elfin Forest Road in San Marcos. The second meeting occurred from 6:00 p.m. to 8:00 p.m. at the San Marcos Community Center in the Main Hall, located at 3 Civic Center Drive in San Marcos.

In accordance with Section 15105(b) of the CEQA Guidelines, and subject to the extension described above, the public review and comment period began on April 1, 2019, and ended on May 30, 2019. The CPUC established a Project voice mail phone number (619) 719-4207, email address (TL6975SanMarcos@esassoc.com), and Project web site (<http://www.cpuc.ca.gov/environment/info/esa/TL6975/index.html>) to enable the public to ask questions, provide comments, and obtain additional information on the Project analyzed in the Draft IS/MND. Over 1,000 written comments were received, the bulk of which were communicated through an online comment tool provided on the Project website. Copies of all

written comments received on the Draft IS/MND are provided in Chapter 2 and/or in Appendix B of this Final IS/MND.

The CPUC received over 1,000 mailed letters, e-mails, comment cards, and online comments from members of the public on the Draft IS/MND. Additionally, 15 public agencies/officials, utilities, and interest groups provided comment letters. At the two public meetings, 53 individuals gave oral comments. An e-petition was also filed and included with 266 e-signatures expressing objection to the Project and support for an underground alternative. Chapter 2, *Comments and Responses*, includes the following: (1) copies of comments from public agencies and organizations and corresponding written responses from CPUC; (2) copies of substantive, detailed comments received from several individuals and corresponding responses; (3) copies of public meeting transcripts and CPUC responses; and (4) a summary of the e-petition text and CPUC's response. In addition, Appendix B includes a table of general and/or non-substantive comments and CPUC responses (Appendix B.1), attachments such as photos and additional documents appended to those general comments (Appendix B.2), and the e-petition including all signatures submitted (Appendix B.3). A brief and general summary of the comments is provided below in **Table 1-1**.

**TABLE 1-1
COMMENT SUMMARY**

Comment	Notable Topics
Prepare an EIR	
Consideration of Alternatives	Undergrounding
Aesthetics	Views from homes, parks, and gateways
	Comparison to the previous utility line (metal vs. wooden poles)
Biological Resources	Clarification on the use of the NCCP, 2017 HCP, and LEHCP for mitigation
	Project effects on adjacent preserves
	Tree and vegetation maintenance
Noise	Corona noise
Recreation	Effects on trails
	Helicopter use
Transportation and Traffic	City of San Marcos requirement for nighttime work in streets
	Encroachment permitting
Wildfire	Emergency evacuation and personal safety
	Fiscal effects (i.e., property value decline, loss of insurance)
Electromagnetic Fields (EMF)	Health risk
Cumulative Impacts	Baseline

1.3 Findings

Based on the analysis conducted in this Final IS/MND, the CPUC has found, on the basis of the whole record before it (including all Project application materials, the Draft IS/MND, public comments received, and other materials), that there is no substantial evidence that the Project would have a potential significant environmental impact that cannot be mitigated to a less-than-significant level. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion or narrative does not constitute substantial evidence (Pub. Res. Code §21080(e); CEQA Guidelines §15064(f)(5)).

In making this finding, the CPUC has considered the opinions of commenters regarding the Project's potential impacts, including aesthetic impacts, and the many photographs submitted that depict past and existing conditions along with commenters' opinions about how the Project may alter those views. Most such comments addressed private views from residences. As explained in Chapter 2 of this Final IS/MND, private views are not considered under CEQA. Several commenters offered unsubstantiated opinions that views from public vantage points such as Palomar Airport Road and Simmons Family Park would be significantly altered. However, in responses to these comments, the CPUC evaluated additional visual simulations from these vantage points and found that the Project's effects on these views would be less than significant. Additionally, as explained in greater detail in Chapter 2, under Responses to Comments I3-5 and I3-25 in Section 2.4.2, the CPUC finds that two photo simulations purporting to address views of the Project from Simmons Family Park and White Sands Drive lack sufficient credibility to be considered as substantial evidence as no vantage point, field of view, or methodology for creating the simulations has been specified, and in the case of the simulation depicting Simmons Family Park, the photo is a distorted panoramic image depicting an unnaturally wide field of view. Similarly, three additional photo simulations shown in Appendix B.2 on pages B.2-24, B.2-26, and B.2-27 lack sufficient credibility to be considered as substantial evidence as no vantage point, field of view, or methodology for creating the simulations has been specified.

The CPUC further finds that Applicant Proposed Measures and mitigation measures identified in the Final IS/MND (see Chapter 4), which are to be required as a condition of certification of approval for the Project, and agreed to by the Project proponent, would avoid or reduce all of the impacts to a less-than-significant level.



Lisa Orsaba, Project Manager

January 10, 2020
Date

Energy Division
California Public Utilities Commission

CHAPTER 2

Comments and Responses

2.1 Introduction

Over 1,000 letters, emails, and online comments provided input on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the SDG&E San Marcos to Escondido TL 6975 69 kV Project, California Public Utilities Commission (CPUC) Permit to Construct Application A. 17-011-010. In addition, 53 people spoke at the two public comment meetings on April 30, 2019; their comments are provided in full in Section 2.4.3. Additional individuals expressed support for consideration of Project alternatives by signing a petition; the list of signatories is provided in Section 2.4.4. All written communications received, and a transcript of the public comment meetings, are included in CPUC's formal record for its review of this Project as required by the California Environmental Quality Act (CEQA).

Under CEQA, the lead agency “shall evaluate any comments on environmental issues” received from people who have reviewed a draft environmental impact report (“EIR”) and prepare written responses that “describe the disposition of significant environmental issues raised” (Pub. Res. Code §21091(d); CEQA Guidelines §15088(c)). Although CEQA does not require the lead agency to respond to comments received on a draft IS/MND, the CPUC has elected to provide written responses to all comments received on this Project's Draft IS/MND which raise significant environmental issues. Responses to comments provided in this chapter address significant environmental issues raised during the 60-day public and agency review period. They are intended to provide refinement and clarification of information presented in the Draft IS/MND and, where noted in Chapter 3 to this Final IS/MND, to update or correct information previously provided.

2.2 General Responses to General Comments

CEQA does not require that substantive responses be provided for comments that do not address the adequacy or accuracy of the environmental analysis or that do not identify an environmental issue (Pub. Res. Code §21091(d); CEQA Guidelines §15088(c)). Comments that do not warrant detailed agency response in this environmental document include, for example, those that merely express favor or disfavor for the project or an aspect of the project, that express feelings about topics that do not fall under the purview of CEQA, or that are not specific to the proposed project. Such comments are addressed in Appendix B.1, General Responses to General Comments. CPUC, as the CEQA lead agency, acknowledges the receipt of this type of input and will consider it as part of the formal record in its decision-making process.

Additionally, the CEQA Guidelines specify that the level of detail contained in a lead agency's response to a comment "may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general)" (CEQA Guidelines §15088(c)). General responses to general comments also are provided in Appendix B.1. In many cases, these general comments are addressed by the Master Responses provided in this section.

2.3 Master Responses to Comments

Many comments on the Draft IS/MND raised common concerns or questions that are most appropriately answered or clarified in one comprehensive or "master" response. The CPUC has provided Master Responses here to address these common concerns. Individual comments related to these topics are referred to the pertinent Master Response in this section. The Master Response topics include the following:

- Master Response 1: Aesthetics
- Master Response 2: Wildfire
- Master Response 3: EMF and Operational Noise
- Master Response 4: CEQA Process
- Master Response 5: Non-CEQA Issues

2.3.1 Master Response 1: Aesthetics

This Master Response responds to comments on the Draft IS/MND that address the analysis of the Project's aesthetics impacts. These comments allege that the analysis improperly describes existing conditions, inadequately analyzes degradation of existing views from public and private vantage points, and lacks substantial evidence to support impact conclusions. Throughout this response, references to figures such as existing conditions photos and visual simulations refer to the Final IS/MND Aesthetics section provided in underline and strikeout in Chapter 3, Revisions to the IS/MND.

Existing Conditions

In order to document the visual change that would occur, five visual simulations were presented in the Draft IS/MND showing before and after images depicting the Project from key observation points (KOPs) along Segments 1 and 2.¹ These KOP locations were clearly presented in Figure 3.1-1. The KOP locations were selected to represent views seen by the largest number of viewers, such as West San Marcos Boulevard and the San Elijo Hills and Lake San Marcos neighborhoods. In response to comments received on the Aesthetics assessment, CPUC staff requested that SDG&E provide photographs of existing conditions and visual simulations of the Project at five additional viewpoints (VPs) or KOPs. In the same manner as for the KOPs included in the Draft IS/MND, the additional information provided by SDG&E was

¹ No visual simulations were prepared for Segment 3, as the Project would use existing towers and infrastructure and would not change the physical appearance of these components in this segment.

independently reviewed and verified on behalf of the CPUC. The additional KOPs and VP represent:

- KOP Y: a “gateway” view entering the City of San Marcos on Palomar Airport Road,
- VP 5: a view from the play field at Simmons Family Park,
- KOP XX: a view from the picnic grounds at Simmons Family Park,
- KOP W: a view from a residential area on Coast Avenue in San Marcos, and
- KOP Z: a view from a residential area on South Rancho Santa Fe Road in San Marcos.

Of these five additional KOPs, visual simulations were prepared for four of them: KOPs W, XX, Y, and Z. As with the visual simulations presented for KOPs A through E in the Draft IS/MND, these additional simulations were based on the Project design. The analysis of these KOPs is provided in Chapter 3 of this Final IS/MND.

KOP Y was prepared in response to the City of San Marcos’ consideration of eastbound Palomar Airport Road/West San Marcos Boulevard as a visual gateway to the City (Final IS/MND Figure 3.1-20). Here the existing electric transmission infrastructure (i.e., TL 13811/13825, TL 680C) are the prominent feature in the foreground, taller than the surrounding landscape trees on the south side of the roadway and in the median. The horizon beyond the landscape trees and infrastructure is comprised of commercial development and additional landscape plantings.

In response to comments, two views from Simmons Family Park have been included in the revised Aesthetics analysis, one with a simulation of the Project overlain on the view. VP 5 is a view taken from the east-central portion of the park grounds to represent what the view would be from the play fields, playground, and parking area (Final IS/MND Figure 3.1-10). This view looking west is enclosed in the foreground by the perimeter sidewalk and trees, showing only the expanse of play field and picnic areas. The line of trees blocks views to the west beyond the park, including the existing TL 13811/13825 transmission line. KOP XX (Final IS/MND Figure 3.1-16) is a view looking west from the park’s picnic area. The existing TL 13811/13825 transmission line visually dominates the middleground view. Beyond it, the background view encompasses the area’s terrain overlain by residential and other development in Carlsbad. Trees, landscaping, and other vegetation visually soften the developed nature of the background view.

KOPs W and Z (Final IS/MND Figures 3.1-22 and 3.1-23) represent views from publicly accessible vantage points within single-family residential neighborhoods. It is noted that views from private properties are not protected under CEQA. The *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal. App. 4th 477 decision held that “[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.” Applied to an analysis of a project’s effects on aesthetics and visual resources, CEQA is concerned with views from vantage points accessible to the public in general, rather than views from privately-held vantage points. Thus, to ensure that this Final IS/MND is responsive to comments received, as well as to be consistent with CEQA case law, KOPs from public streets located entirely within single-family residential neighborhoods adjacent to the Project are included. However, no KOPs representing views from private properties

(e.g., residential backyards) have been included. Master Response 5, Non-CEQA Issues, provides additional discussion of aesthetic effects on views from and affecting private properties; however, such effects are not discussed further in this master response.

Approach to Analysis of Aesthetic Impacts

The methodology for the Draft IS/MND analysis of aesthetic impacts is adapted from an approach established by the Federal Highway Administration (FHWA).² As noted in the Methodology discussion found in Section 3.1.4, Environmental Impacts, the FHWA methodology holds that:

An adverse aesthetic impact may occur when: (1) an action (i.e., a “project”) perceptibly changes the existing physical features of the landscape that are characteristic of the region or locale; (2) an action introduces new features to the physical landscape that are perceptibly uncharacteristic of the region or locale, or become visually dominant in the viewshed; or (3) an action blocks or totally obscures aesthetic features of the landscape. The degree of visual impact depends on the noticeability of the adverse change. The noticeability of a visual impact is a function of a project’s features, context, and viewing conditions (angle of view, distance, and primary viewing directions). The key factors in determining the degree of visual change are visual contrast, project dominance, and visual screening.

The Methodology discussion goes on to explain the rationale in assessing adverse aesthetic impact significance, which is based on the combined factors of visual sensitivity and degree of visual change attributable to the Project. Again based on FHWA methodology, Table 3.1-2, *Guidelines for Determining Adverse Aesthetic Impact Significance*, which considers these factors, was used as the basis for assessing the visual impact of the Project.

CEQA Guidelines Section 15064.7, supported by the decision rendered in *Mira Mar*, provides a lead agency discretion to set thresholds for determining impact significance. In the case of this Project, CPUC under this authority determined that the FHWA methodology would be appropriate for the aesthetic impacts assessment.

The analysis provided in Chapter 3 of this Final IS/MND in response to Question c has been revised to indicate that portions of the Project are, in fact, located within an urbanized area as defined by CEQA Guidelines Section 15387, and as mapped by the U.S. Census (U.S. Census Bureau, 2010). This revision does not change the impact conclusion.

Substantial Evidence Supporting Analysis of Degradation of Visual Character and Quality

Segment 1

Comments were received regarding the visual perception of the new, larger steel poles in Segment 1. It was suggested that the appearance of the new poles and additional power lines would be intimidating, or more imposing, to students attending schools along this segment. The

² U.S. Department of Transportation, Federal Highway Administration, 2015. Guidelines for the Visual Impact Assessment of Highway Projects.

evaluation of visual impact focused on physical visual contrast the Project would create compared to the baseline condition. As noted in the Methodology discussion found on Draft IS/MND page 3.1-15, visual contrast is a measure of the degree of change in line, form, color, and texture that a project would create, when compared to the existing landscape. These are measurable attributes used to evaluate a project's effect on the *physical conditions on the environment*. Accordingly, the impact questions presented in CEQA for aesthetics address physical conditions, such as scenic vista views, designated scenic resources, and the visual character and quality of public views.

As noted above, KOP Y was prepared in response to the City of San Marcos' consideration of eastbound Palomar Airport Road/West San Marcos Boulevard as a visual gateway to the City (Final IS/MND Figure 3.1-20). The resulting analysis, based on a comparison of the existing view and simulated view, demonstrates that the taller poles would be more perceptible than the existing poles. Yet the amount of existing electric transmission infrastructure at this KOP, coupled with the fact that the Project replaces an existing transmission line along West San Marcos Boulevard, there would be a low to moderate visual change when the FHWA methodology is applied.

While the Project would change the appearance of the existing transmission infrastructure in Segment 1 (i.e., replace existing infrastructure with taller poles), it would not change the visual character of the area, introduce a new uncharacteristic feature, or block or obscure an existing unobstructed view. Segment 1 would not create a strong visual contrast when compared to the existing, or baseline, views because the Project is designed such that the new poles would be located in the same spacing as the existing poles. The number and alignment of poles would not change; their actual position would change only slightly (i.e., 6- to 8-foot offset from existing poles). The addition of three strands of conductor would not change the visual line and form of the existing utility, as can be seen in the simulations provided in Final IS/MND Figures 3.1-17 and 3.1-18. As noted in the analysis, while there may be moderate change to the existing visual environment, the visual character of the area would not change to the extent that a significant impact would be created pursuant to the established methodology used for this analysis.

Segment 2

Several comments address the combined aesthetic effects of the proposed Segment 2 and the existing 138 kilovolt (kV) transmission line (TL 13811/13825) that would remain in the SDG&E right-of-way (ROW) parallel to the proposed 69 kV line. This existing steel pole infrastructure was constructed in 2010, replacing wooden H-frame structures previously occupying the ROW. Draft IS/MND Section 3.1.1 clearly identifies the existing 138 kV transmission line as part of the existing visual condition against which the Project is evaluated. Draft IS/MND Section 3.21, Mandatory Findings of Significance, states, "The ongoing environmental effects of past projects are reflected in the baseline environmental conditions described in Section 3.1.1, Environmental Setting" and acknowledges that "in each Project segment, there are existing utility transmission structures. While the changes *attributable to the Project* would be visually apparent (i.e., new, taller steel poles), the character of the new structures would not substantially affect the existing visual character or quality in the Project area" (emphasis added, see page 3.21-10). The CPUC acknowledges commenters' concerns regarding the combination of visible elements of existing

TL 13811/13825 and proposed TL 6975. Therefore, the analysis of the cumulative visual impacts – that is, the Project’s impacts taken together with other closely related past, present, and reasonably foreseeable probable future projects – has been revised to more clearly explain its relationship to these other projects and evaluate the Project’s incremental cause of, or contribution to, overall visual contrast and change; please see Chapter 3, Revisions to the IS/MND.

Additionally, in response to public comment, VP 5 and KOPs W, XX, and Z were prepared and incorporated into the revised Aesthetics analysis. The results of the analysis, provided in Final IS/MND Chapter 3, indicate that the findings of the analysis presented in the Draft IS/MND do not change. While the Project would add infrastructure in a corridor already containing similar and larger infrastructure in Segment 2, it would not change the visual characteristics of the area, introduce a new uncharacteristic feature, or block or obscure an existing unobstructed view. Segment 2 would not create a strong visual contrast when compared to the existing, or baseline, views. As noted in the analysis, while there may be moderate change to the existing visual environment, the visual characteristics of the area would not change to the extent that a significant impact would be created pursuant to the established methodology used for this analysis.

Segment 3

As described in Draft IS/MND Section 3.1.4 (see page 3.1-17), the re-energization of Segment 3 would cause no change in the physical appearance of existing facilities in the SDG&E ROW; therefore, Segment 3 would have no long-term aesthetic impact.

Conclusion

The consistent application of established methodology to all Project components, combined with the use of visual simulations based on Project-specific design data, provides substantial evidence to support the conclusion in the IS/MND that aesthetic impacts would be less than significant.

2.3.2 Master Response 2: Wildfire

Several commenters state that the Draft Initial Study/Mitigated Negative Declaration (IS/MND) did not address wildfire impacts during Project operation. In fact, Draft IS/MND pages 3.20-11 and 3.20-14 through 3.20-16 specifically address operation and maintenance-phase impacts related to wildfire.

This Master Response addresses comments that the Draft IS/MND errs in concluding that operation and maintenance-phase wildfire impacts would be less than significant. As this Master Response explains, the Draft IS/MND adequately addresses wildfire impacts and appropriately relies on systematic approaches to wildfire prevention and suppression in its determination that operation-phase impacts would be less than significant.

Existing Fire Hazards in the Project Area

The environmental setting for the Project described in the Draft IS/MND is accurate and is adequate to support the impact analysis. As summarized below, the existing fire hazard based on

fuels, topography, wind, and weather is very high throughout most of the Project vicinity; however, this fire hazard is not unique to the Project vicinity.

The Draft IS/MND clearly identifies and explains the sources of the fire hazard mapping relevant to the Project vicinity. As described in Draft IS Section 3.20.1 on pages 3.20-1 and 3.20-2 and as shown in Figure 3.20-1, a portion of Segment 1 and nearly all of Segments 2 and 3 would pass through Very High Wildfire Hazard Severity Zones (FHSZs) as mapped by the California Department of Forestry and Fire Prevention (CAL FIRE). FHSZ designations are “based on fuel loading, slope, fire weather, and other relevant factors including areas where Santa Ana, Mono, and Diablo winds have been identified by the Department of Forestry and Fire Protection as a major cause of wildfire spread,” as required by Government Code Section 51178. The Draft IS/MND describes the Project area fuels, slope (topography), weather, and the presence of Santa Ana winds on page 3.20-4; these are factors that contribute to CAL FIRE’s determination that much of the Project alignment would be located in Very High FHSZs. Further explained on Draft IS page 3.20-5 are the “fuel alignment,” long fire season, and large number of homes in the wildland-urban interface that present a challenge to fire management in the region.

As also shown in Figure 3.20-1, about half of Segment 2 and nearly all of Segment 3 would pass through a CPUC-designated Tier 2 High Fire-Threat District, defined as an area “where there is an elevated risk (including likelihood and potential impacts on people and property) from wildfires associated with overhead utility power lines” (Draft IS/MND pages 3.20-2 and 3.20-3). As indicated by this definition, these High Fire-Threat District designations are specific to the siting, operation, and maintenance of overhead power lines.

The CPUC previously has considered the question of whether the presence of a power line in this vicinity would be uncharacteristic compared to other areas of SDG&E’s service territory with respect to fire hazard. In its Resolution E-4245 regarding the existing TL 13825 located in the same right-of-way (ROW) as proposed TL 6975 Segment 2, it stated,

Approximately 56 percent or more depending on seasonal weather and climate conditions, of SDG&E service territory has been designated as very high fire hazard severity zone on Cal Fire maps for local responsibility area lands. Given the presence of other overhead power lines throughout high fire hazard areas within SDG&E service territory, the Project does not present an “unusual circumstance”. (CPUC, 2009)

In addition to the high percentage of Very High FHSZ within SDG&E’s service territory, CPUC high fire threat mapping shows that about 48 percent of the service territory is in either a Tier 2 (elevated) or Tier 3 (extreme) fire threat area. Therefore, the location of the proposed Project is not unusual in its existing fire hazard potential. The Draft IS/MND properly uses fire hazard mapping to identify the existing conditions against which to evaluate the Project. The relevance of these observation to the Project is the question of whether the wildfire risk in the Project vicinity is uncharacteristic in some way that would render the Project’s impact significant, even considering the implementation of all plans and policies for wildfire prevention and suppression that apply to SDG&E’s ongoing operation and maintenance of its electrical transmission system. As described below, the analysis properly relies on existing statewide and regionwide systematic

approaches to wildfire prevention and suppression to determine the potential for Project-related significant impacts.

Project Contribution to Wildfire Risk

Draft IS/MND pages 3.20-10 through 3.20-12 address the following question from the CEQA Appendix G environmental checklist: “Would the Project substantially impair an *adopted* emergency response plan or emergency evacuation plan?” (emphasis added). To date, no emergency response or evacuation plan has been adopted for San Elijo Hills; the only adopted plans identified are the 2018 San Diego Unit Strategic Fire Plan described on Draft IS/MND page 3.20-9 and the map of emergency evacuation routes and emergency/evacuation preparedness instructions issued by the Rancho Santa Fe Fire Protection District described on Draft IS/MND page 3.20-6.

In Draft IS/MND Section 3.20, Wildfire, checklist question b addresses the topic of whether the Project would exacerbate wildfire risks, and whether it would thereby expose “project occupants” to the uncontrolled spread of a wildfire. The analysis acknowledges that the Project would not have “occupants” but would be located in existing communities and addresses the exposure of these communities to wildfire risks that may be exacerbated by the Project.

The concept of wildfire “risk” is expanded upon here to clarify CPUC’s meaning. A wildfire risk analysis combines an assessment of the likelihood of a wildfire occurring (i.e., caused by or contributed to by the Project) with an assessment of the consequences of a wildfire (e.g., personal safety, environmental degradation). Therefore, the Project could exacerbate wildfire risk under CEQA if it were to increase the *likelihood* of wildfire, such as by introducing a new or more likely ignition source compared to existing conditions, and/or if it were to cause some change in the environment that would increase the environmental or human health *consequences* of a wildfire, such as by introducing an impediment to safe evacuation or by introducing a source of pollutants that may be released by a wildfire.

Because the potential for environmental or human health consequences of wildfire is largely a matter of existing conditions in the Project vicinity, the subsections below first address these topics. Following those discussions, this master response addresses the Project’s potential to increase the likelihood of wildfire ignition.

Project Effects on Emergency Evacuation

With respect to emergency evacuation, written comments and comments made at the public meetings presented information about a previous evacuation of San Elijo Hills, Harmony Grove, and other communities in the Project area, when in 2014, the Cocos Fire burned about 2,000 acres in San Marcos and Escondido (CAL FIRE, 2014). These facts describe existing conditions, not effects of the Project. However, they are relevant to the Project analysis because they describe a particularly vulnerable setting due to inadequate emergency egress and inadequate evacuation planning and preparedness. The cause of the Cocos Fire was determined to be arson (Littlefield and Figueroa, 2015). Commenters state that road closures and evacuation from San Elijo Hills resulted in substantial traffic on roads within the community and particularly on the only open

road out of the community. A 2015 article provides some additional information: that Twin Oaks Valley and Elfin Forest roads were closed by the fire, leaving only westbound San Elijo Road as an evacuation route and causing traffic conditions that delayed evacuation by about two hours (St. John, 2015).

Commenters describe two distinct concerns related to the Project's potential effects on emergency evacuation. The first concern is that the Project could increase the likelihood of wildfire ignition, which in the context of existing evacuation difficulties would substantially increase the potential for health and safety consequence. The potential for the Project to increase the likelihood of ignition is addressed below.

The second concern is that in Segment 3, where the existing ROW and a de-energized portion of TL 13811/13825 cross San Elijo Road, there is the potential for energized high-voltage electrical lines to fall across the road, creating an impassable barrier on the primary evacuation route from San Elijo Hills and surrounding area. Commenters' concerns about the potential for energized high-voltage electrical lines to fall across San Elijo Road are acknowledged. In Segment 3, where the existing SDG&E ROW and existing de-energized TL 13811/13825 cross San Elijo Road near Meadowlark Junction, the Project would not result in a new or additional road crossing. As explained in Draft IS/MND Section 2.4.2, in Segment 3, the Project would reconductor and re-energize the existing TL 13811/13825, primarily on existing steel lattice towers. The reconducted power line would be converted from the existing 138 kV voltage to 69 kV, lowering the voltage compared to existing facilities. At the San Elijo Road crossing specifically, at least four existing wood poles would be removed and three new steel poles would be installed to convey the reconducted, lower-voltage line (see Draft IS/MND Appendix A, Figure A-20). Because no additional power line would be installed at this location, the Project would not increase the potential for downed high-voltage lines across San Elijo Road compared to existing conditions. Rather, the Project would improve upon existing conditions by replacing wood poles that could break or fall in fire or high wind conditions with steel poles. This is consistent with SDG&E's wood-to-steel program to undertake the replacement of wood poles (designed to withstand 56 mile-per-hour wind speeds) with steel poles (designed to withstand at least 85 mile-per-hour wind speeds) in CPUC High Fire Threat Districts, as described in the SDG&E Fire Prevention Plan (see Draft IS/MND pages 3.20-7 and 3.20-8). Therefore, the Project would have no adverse impact from the potential for downed high-voltage power lines on San Elijo Road compared to existing conditions.

Significance of Project-Specific Contribution to Likelihood of Wildfire Ignition

Many commenters express concern that, particularly in Segment 2 where an additional power line would be constructed, the Project could increase the likelihood of wildfire ignition. As described in Draft IS/MND Section 3.20 (see page 3.20-14), Project work within substations, the wood-to-steel replacement along an existing power line in Segment 1, and reconductoring and wood-to-steel replacement in Segment 3 would have no adverse impact on the likelihood of ignition and in some cases would have a beneficial effect compared to existing conditions. Therefore, Segment 2, the new build, is the focus of questions related to wildfire ignition.

The Draft IS/MND discloses that electrical lines can start fires in several ways: if an object contacts the conductors and a second object simultaneously, if system component failures or maintenance accidents cause line faults resulting in arcing, or if conductor-to-conductor contact occurs.

CAL FIRE maintains lists of the top 20 largest (by acreage), top 20 most destructive (by structural losses), and top 20 deadliest fires in California history, dating back to the 1920s (CAL FIRE, 2019a, 2019b, 2019c). On the 2019 lists, nine are listed as being caused by power lines. Two of these occurred in SDG&E's service area, the 1970 Laguna Fire and the 2007 Witch Fire. The Witch Fire burned nearly 200,000 acres and resulted in 1,650 structures lost and 2 deaths after two SDG&E 69 kV lines contacted during strong Santa Ana Winds (CAL FIRE, 2007; Patel, 2012). This potential source of ignition from conductor contact is disclosed on Draft IS/MND page 3.20-14.

The CPUC, along with CAL FIRE and the California Legislature, acknowledge that power lines are potential sources of ignition. Commenters state that the Project's incremental increase in the likelihood of wildfire ignition during operation and maintenance should be considered a significant impact under CEQA. The Draft IS/MND analysis in Section 3.20, Wildfire, acknowledges that the addition of the Segment 2 New Build and the ongoing operation of Segments 1 and 3 have the potential to result in a minor increase in the risk of ignition from the power lines. The analysis concludes, however, that the risk of exposing surrounding communities to exacerbated risk of the uncontrolled spread of a wildfire and associated impacts would be less than significant. This conclusion is based on the following sources of statewide or region-wide fire prevention and suppression requirements, which would be required during operation of proposed TL 6975: CPUC General Orders 95, 165, and 166; Senate Bill 1028; and SDG&E's Fire Prevention Plan and Electrical Standard Practice 113.1.

Reliance on these statewide and region-wide fire prevention and suppression requirements is further supported by numerous examples in California law, policy, and regulation of support for a statewide, regional, and/or system-wide approach to wildfire management. For example, the 1993 "Bates Bill," which introduced requirements that local agencies designate CAL FIRE-recommended Very High FHSZs by ordinance, states: "The Legislature hereby finds and declares as follows: ... The prevention of wildland fires is not a municipal affair...but is instead, a matter of statewide concern" (California Government Code Section 51175). Additionally, the CPUC regulates utilities through general orders that identify consistent requirements for power lines based on voltage, vegetation, fire threat, and other factors. SDG&E conducts annual system-wide inspections and maintenance to ensure implementation of these requirements. Substantial evidence in the form of regular reporting to CPUC supports a conclusion that SDG&E is in compliance with these requirements.

In addition to the laws and plans described in the Draft IS/MND, following publication of the Draft IS/MND, the CPUC approved SDG&E's 2019 Wildfire Mitigation Plan on May 30, 2019 (CPUC, 2019; SDG&E, 2019a). In doing so, the CPUC imposes reporting, metrics and related requirements on SDG&E to ensure it gathers appropriate data on the effectiveness of its mitigation, and shares the data with the Commission, CAL FIRE, and others. Implementation of

this plan would further ensure that SDG&E's ongoing maintenance of TL 6975 would adhere to existing requirements, and requirements to update this plan annually would ensure that any new requirements that would apply to Project power lines would be incorporated in a timely manner.

Summary and Non-CEQA Issues

In summary, the Draft IS/MND has found that the Project would not affect the existing evacuation scenario in the Project area. Based on implementation of statewide requirements and plans and policies that apply to all of SDG&E's service territory, much of which is in similar fire hazard zones, the Project would not significantly exacerbate wildfire risks and, therefore, would not expose surrounding communities to the uncontrolled spread of a wildfire.

The determination that the Project would have a less-than-significant impact related to exacerbating wildfire risks during operation is supported by substantial evidence. Comments on the Draft IS/MND have not presented new information that would lead to a different conclusion.

Finally, a number commenters argued that the Project could adversely affect the price of private property insurance, or reduce the availability of such policies. The cost and availability of private property insurance, in addition to being governed by numerous variables not potentially affected by this Project, is an economic concern. Master Response 5, Non-CEQA Issues, addresses economic issues such as these.

2.3.3 Master Response 3: EMF and Operational Noise

Electric and Magnetic Fields

This Master Response addresses comments regarding extremely low frequency (ELF) electric and magnetic fields (EMF). The potential relevance and effects of EMF are discussed in Section 2.9, Electric and Magnetic Fields Summary, of the Draft IS/MND Project Description. As described in on Draft IS/MND page 2-61, the CPUC does not consider EMF in the context of the CEQA analysis of potential environmental impacts because 1) there is no agreement among scientists that EMF create a potential health risk; and 2) there are no defined or adopted CEQA standards for defining health risk from EMF.

Presently, there are no applicable federal, State or local regulations related to EMF levels from power lines or related facilities, such as substations. However, in compliance with CPUC Decisions 93-11-013 and 06-01-042, SDG&E would be required to implement a Field Management Plan that includes quantitative estimates of EMF and describes the measures SDG&E would implement to reduce magnetic field levels caused by the Project. CPUC policies and procedures (as reflected in Decision D.06-01-042) require utilities to incorporate "low-cost" or "no-cost" measures for managing EMF from power lines up to approximately four percent of the total Project cost.

For informational purposes, the Project-specific Detailed Magnetic Field Management Plan is provided in Appendix C to this Final IS/MND. As stated above, this Field Management Plan is

required by CPUC Decisions 93-11-013 and 06-01-042, and is not required to nor relied upon to mitigate any significant Project impact under CEQA.

Power Line Corona Noise

Several commenters suggest that humming or buzzing noise is audible from existing power lines in the proposed TL 6975 right-of-way and express concern that the Project could increase noise levels. The term “corona” is used to describe the breakdown of air into charged particles caused by the electrical field at the surface of a conductor. This concept is associated with all energized electrical devices, including power lines. Audible noise levels generated by corona discharge vary depending on weather conditions as well as on the voltage of the line. Wet weather conditions often increase corona discharge due to accumulation of raindrops, fog, frost, or condensation on the conductor surface, which causes surface irregularities that promote corona discharge.

Corona effects occur with greater intensity in higher voltage lines than in lower voltage lines. According to the Electric Power Research Institute (EPRI), noise levels 25 feet directly below 138 kV transmission lines under wet conditions tend to be approximately 37 dBA (EPRI, 1978). Noise levels under the Project’s 69 kV conductors would be expected to be lower due to the lower voltage. Nevertheless, here, the noise level of 37 dBA is used to represent worst case corona noise levels that would occur directly below the TL 6975 power line conductors during wet weather conditions because commenters indicate that existing corona noise from the 138 kV TL 13811/13825 power line within the Segment 2 right-of-way currently is audible in wet weather conditions.

In Segment 1, where the closest residences would be approximately 25 feet from the proposed power line, the maximum noise level under this worst-case scenario would be approximately 36 dBA Leq, which over a period of 24 hours equals an Ldn of approximately 42 dBA. This noise level would be below the most stringent exterior noise level standards identified by the local jurisdictions in the Project area (i.e., 45 dBA Leq). Furthermore, in Segment 1, the Project would replace existing poles with taller poles, increasing the distance between the residences and the conductors which would result in greater attenuation of noise. In Segment 2, residences would be at least 50 feet from the proposed alignment; thus, noise levels at the nearest residences would be even lower than estimated for Segment 1. In Segment 3, the Project would replace or reenergize existing 69 kV conductor, resulting in no change compared to existing conditions. Overall, impacts of intermittent operational corona noise would be less than significant.

2.3.4 Master Response 4: CEQA Process

Summary of CEQA Process to Date

On November 15, 2017 San Diego Gas and Electric Company (SDG&E) submitted a PTC Application (A.17-11-010) to CPUC for the SDG&E San Marcos to Escondido Tie Line (TL) 6975 69 kV Project (Project). Responding to this application, the CPUC prepared a Draft IS/MND.

On April 1, 2019, the CPUC filed a Notice of Completion (NOC) with the Governor’s Office of Planning and Research (State Clearinghouse), published a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration, and released the Draft IS/MND for a 45-day public review period. On May 3, 2019, the CPUC extended the comment period by 15 days. The extended comment period closed on May 30, 2019, resulting in a 60-day review period.

The CPUC held two public meetings to present information about the Project and Draft IS/MND to interested parties and to hear comments. Both meetings occurred on April 30, 2019. The first meeting occurred at 1:00 p.m. in San Elijo Hills, and the second meeting occurred at 6:00 p.m. at the San Marcos civic center. A court reporter was present to record oral comments.

Over 1,000 comment letters, emails, and responses to the CPUC online comment tracker tool were timely received and are reproduced and responded to in this Final IS/MND.

Decision to Prepare a Mitigated Negative Declaration

Numerous commenters requested that the CPUC prepare an EIR for the Project. As stated in Draft IS/MND Chapter 1, pursuant to the requirements of the CEQA statute, the CEQA Guidelines, and CPUC General Order (GO) 131-D, the CPUC has prepared an initial study to evaluate potential environmental impacts of the Project. CEQA requires that if an initial study prepared for a project indicates that significant environmental effect(s) that cannot be mitigated to a less-than-significant level could occur, the lead agency shall prepare an Environmental Impact Report (EIR). An MND may be prepared when “the initial study has identified potentially significant effects on the environment, but: (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment” (Pub. Res. Code §21064.5).

Prior to issuance of the Draft IS/MND, the CPUC as CEQA lead agency determined based on the results of the IS that there was substantial evidence in the record that the Project’s potentially significant effects on the environment would be avoided or mitigated by revisions in the Project plans or proposals made by or agreed to by the Applicant (i.e., applicant-proposed measures and mitigation measures, respectively) to a point where no significant effect on the environment would occur. Therefore, pursuant to Public Resources Code Section 21064.5 and CEQA Guidelines Section 15064(f)(2), the CPUC determined that the appropriate type of CEQA documentation for this Project was an MND.

After consideration of all comments received on the Draft IS/MND, and after preparing detailed responses to those comments as reflected in this chapter, the CPUC has determined that an MND remains the appropriate type of CEQA documentation for the Project. No substantial evidence has been presented that has identified a fair argument that a significant effect on the environment may occur that cannot be mitigated to a less-than-significant level. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument,

speculation, and unsubstantiated opinion or narrative does not constitute substantial evidence (Pub. Res. Code §21080(e); CEQA Guidelines §15064(f)(5))

Based on the above application of CEQA statute and Guidelines, as well as applicable requirements of GO 131-D, no EIR has been prepared for this Project.

Consideration of Project Alternatives

Many comments received on the Draft IS/MND request consideration in the CEQA document of alternatives to the Project, including an alternative that would place some or all of the Project underground. The CPUC acknowledges these comments and the public's interest in alternatives to SDG&E's Project.

A lead agency is only required to consider alternatives to a proposed project when an EIR is prepared. Specifically, "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would *avoid or substantially lessen any of the significant effects of the project*, and evaluate the comparative merits of the alternatives" (CEQA Guidelines §15126.6(a); emphasis added). There is no similar requirement for negative declarations or MNDs.

Many commenters referred to SDG&E's Proponents Environmental Assessment (PEA), which has been available on the CPUC website for the Project since 2017, and suggested that CPUC should evaluate alternatives discussed therein. The PEA is a component of SDG&E's PTC application for the Project, and is not prepared by CPUC staff. Although the PEA is referenced in the MND as a source document for information about the Project description, the Draft and Final IS/MND constitute CPUC's independent CEQA analysis. Although the PEA discusses alternatives to the Project, none of these alternatives is proposed in Application 17-011-010. Because the Project would not result in significant effects, as stated in this IS/MND, the CPUC is not required to evaluate any of the PEA alternatives, or any other alternatives, in its CEQA review.

Although the CPUC is not required to evaluate Project alternatives in this Final IS/MND, in order to identify whether SDG&E could feasibly put forth alternatives or design improvements that would address concerns communicated in the comments on the Draft IS/MND, CPUC issued Data Requests 12 and 13 to SDG&E seeking additional information. SDG&E's response to Data Request 12 indicated that it is not feasible to locate the TL6975 conductor on the existing TL13811/13825 poles in the Segment 2 right of way (including as an underbuilt line); that the underground option described in the PEA was technically feasible but not proposed because the cost would be potentially two or three times greater than that of the Project; and identifying additional aesthetic considerations that were incorporated into the proposed pole locations, heights, and finishes. (SDG&E, 2019e, 2019f). This data request and response are informational in nature and do not affect the CPUC's independent evaluation of the Project or its obligations under CEQA.

2.3.5 Master Response 5: Non-CEQA issues

This Master Response addresses comments received regarding potential adverse effects on property values with the placement of new or Project poles near their properties; past experience of and/or potential future loss of homeowner's insurance policies or increased insurance premiums resulting from a perceived increase in wildfire risk; changes in views from private vantage points; and changes in "community character" attributable to the Project. The CPUC acknowledges these concerns. As described in this Master Response, these issues are outside the scope of the CEQA analysis of environmental impacts. Nonetheless, the comments received on these topics are part of the record for this Project and will be considered along with the IS/MND at the decision-making stage of this Project.

Under CEQA, the analysis of potential impacts "shall be limited to substantial, or potentially substantial, adverse changes in physical conditions" in the environment (Pub. Res. Code §21151(b); CEQA Guidelines §15358(b)). CEQA's definition of the environment includes "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (Pub. Res. Code §21060.5). CEQA's definition of the environment does not include economic or social effects (including psychological or social impacts on community character) unless those effects result in a change in the physical environment. The CEQA Guidelines emphasize this point. Pursuant to CEQA Guidelines Section 15131, subdivision (a):

Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Additionally, CEQA Guidelines Section 15064 states, "Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment." Without evidence to suggest a direct or indirect correlation between economic or social changes and a physical change, such a finding would be speculative, which is also not permissible under CEQA. CEQA Guidelines Section 15046, subdivision (d)(3) states:

An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

Property Values and Private Property Insurance

A potential change in property value is considered an economic concern unless it would result in a physical change on the environment. No evidence has been presented that potential changes in property values would result in physical changes on the environment. Courts have indicated that

the potential for a proposed project to adversely affect property values is not a CEQA concern (*Porterville Citizens for Responsible Hillside Development v. City of Porterville* (2007) 157 Cal. App. 4th 885, 903, citing *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205; CEQA Guidelines, § 15131, subd. (a)). Therefore, CEQA does not require analysis of this issue. Additionally, projecting the magnitude of any decrease in property values, which would be affected by multiple factors, would require real estate market analysis and would likely be speculative. Therefore, this is beyond the lead agency's scope of environmental review under CEQA.

Similarly, potential increases in the price of private property insurance, or potential changes in the availability of such policies, also is an economic concern. There is no evidence that potential changes in the price or availability of insurance would result in physical changes on the environment. Thus, for the same reasons property values are not within the scope of this IS/MND, insurance issues similarly are not addressed here.

Furthermore, the California Legislature acknowledges the financial hardships and adverse environmental impacts that could result from construction of new high voltage transmission lines within *new* rights-of-ways. In response, the Legislature enacted Senate Bill (SB) 2431 (Garamendi, Chapter 1457, Statutes of 1988), which established, through existing licensing processes, all of the following:

1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
2. When construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible.
3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.
4. Where there is a need to construct additional transmission, seek agreement among all interested utilities on the efficient use of that capacity. In directing the Energy Commission to conduct an investigation and prepare a report outlining recommended policies and actions, SB 2431 plainly stated that the purpose of the report was to facilitate effective, long-term transmission line corridor planning.

Project transmission lines would be located within existing SDG&E rights-of-way, with the exception of the need to widen the existing ROW in Section 1. This is consistent with the principles of SB 2431.

Private Views and Community Character

Some commenters also connected potential property value loss and the Project by citing its effects on views from private properties. As explained in Master Response 1, views from private properties are not protected under CEQA. (See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal. App. 4th 477, 492 [“Under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.”].)

Accordingly, and consistent with the preceding discussion addressing property values, there is no requirement in CEQA or CEQA case law to treat effects on private views that could affect private property values as physical changes in the visual environment. Physical impacts on views from public vantage points are addressed in detail in Draft IS/MND Section 3.1 and in Master Response 1, Aesthetics.

A number of comments also alleged that the Project would negatively affect the area's community character. Community character is not an environmental resource or physical characteristic defined in CEQA. "CEQA does not require an analysis of subjective psychological feelings or social impacts." (*Preserve Poway v. City of Poway* (2016) 245 Cal. App.4th 560, 579.) As noted above, CEQA Guidelines Section 15131, subdivision (a), social and economic effects are not considered environmental impacts pursuant to CEQA. Therefore, this is beyond the lead agency's scope of environmental review in this IS/MND.

CPUC Decision Making

Documentation prepared pursuant to CEQA is one of a number of components used to inform decision-making by the CPUC by providing an assessment of the potential environmental impacts that would result from the Project. The consideration of the above-described issues is outside the scope of the IS/MND. When the CPUC considers whether to approve SDG&E's application for the Project through its formal proceeding process, it will consider the IS/MND along with economic and other considerations pursuant to applicable law.

2.4 Responses to Comments

This section contains responses to all of the comments received on the Draft IS/MND during the public review period raising significant environmental issues. Each comment letter was assigned a letter and number identifying the source as either an agency or organization (e.g., A1, A2) or an individual (e.g., I1, I2). Each substantive comment was assigned a comment number (e.g., A1-1, 13-2, etc.). On the following pages in this section, each comment letter is reproduced in its entirety followed by the responses to each comment within the letter. The comments received resulted in minor revisions to the IS/MND, as summarized here and shown in underline and ~~strikeout~~ in Chapter 3.

2.4.1 Agency and Organization Comments

This section presents the comments received from agencies or other organizations on the Project, as well as CPUC's coded responses to those comments. The 15 public agencies and officials, utilities, and interest groups who provided comment letters are listed below in **Table 2-1**.

TABLE 2-1
LIST OF AGENCY/ORGANIZATION COMMENT LETTERS

Letter	Commenter	Date
A1	Brighton Ridge Homeowners	May 28, 2019
A2	California Department of Fish and Wildlife	May 30, 2019
A3	California State Assembly, Seventy-Fifth District, Marie Waldron	May 28, 2019
A4	California Department of Transportation	May 15, 2019
A5	Center of Natural Lands Management	May 30, 2019
A6	City of Carlsbad	May 24, 2019
A7	City of San Marcos	April 8, 2019
A8	City of San Marcos	May 29, 2019
A9	County of San Diego	May 30, 2019
A10	North County Advocates	May 24, 2019
A11	San Diego Gas and Electric	May 30, 2019
A12	San Marcos Unified School District	May 29, 2019
A13	Rincon Band of Luiseno Indians	May 3, 2019
A14	City of San Marcos, Sharon Jenkins, Mayor Pro Tem	May 30, 2019
A15	City of San Marcos, Randy Walton, Councilmember	May 22, 2019



Lindsay Management Services

A Division of Corporate Management Consultants, Inc.

May 28, 2019

California Public Utilities Commission
ATTN: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd., Suite 200
Petaluma, CA 94954

Dear Commissioners,

On behalf of the board of directors of the Brighton Ridge Homeowners' Association (HOA) and the residents of Brighton Ridge, I hereby request that you **require San Diego Gas & Electric to conduct a comprehensive Environmental Impact Report** on the proposed *San Marcos to Escondido Tie Line 6975 69kV Project*.

A1-1

Brighton Ridge is a neighborhood of 22 homes located in the city of San Marcos. Our community is immediately adjacent to the proposed Segment 2-New Build. This part of the project will double the number of steel transmission poles and overhead power lines. This will significantly and negatively impact the aesthetics and views from our homes and from nearby city-owned Simmons Family Park and hiking trails. Equally impacted, significantly and negatively, will be our health, safety, insurance rates, and property values due to the heightened fire risk from having more high-voltage power lines running through our canyons and open spaces.

A1-2

A full, comprehensive Environmental Impact Report that objectively assesses *all* options and alternatives is essential to protecting the rights and interests of Brighton Ridge's homeowners.

A1-3

Please do the right thing and require SDG&E to conduct an Environmental Impact Report for this project.

Sincerely,

Gary Lester
President, Brighton Ridge Homeowners' Association

cc: Ms. Rebecca Jones
Mayor, City of San Marcos

Mr. Randy Walton
City Council Member, District 2, City of San Marcos

Mr. Jack Griffin
City Manager, City of San Marcos

Letter A1: Brighton Ridge Homeowners Association

- A1-1 With respect to the request to prepare an EIR, please see Master Response 4, CEQA Process.
- A1-2 With respect to aesthetic impacts on public views, including from Simmons Family Park, please see Master Response 1, Aesthetics. Wildfire-related concerns are addressed in Master Response 2, Wildfire. Private views, property values, and insurance are addressed in Master Response 5, Non-CEQA Issues.
- A1-3 Master Response 4, CEQA Process, responds to the request to prepare an EIR and to consider alternatives to the Project.



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 30, 2019

Mr. David D. Davis
Environmental Science Associates
1425 N. McDowell Blvd. Ste 200
Petaluma, CA 94954

Subject: Notice of Proposed Draft Initial Study and Mitigated Negative Declaration for the San Diego Gas and Electric Company's San Marcos to Escondido Tie Line (TL) 6975 69 kilovolt (kV) Project, California Public Utilities Commission (SCH # 2019049009)

Dear Mr. Davis:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Proposed Draft Initial Study (IS) and Mitigated Negative Declaration (MND), dated April 1, 2019, and has identified potential effects of this project on wildlife and sensitive habitats. The comments and recommendations provided herein are based on the information provided in the IS/MND and associated documents, as well as our knowledge of sensitive and declining vegetation communities and our participation in regional conservation planning efforts.





The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) 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 (Fish and Game Code §2050 *et seq.*) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code 2800, *et seq.*). San Diego Gas and Electric (SDG&E) participates in the NCCP program by implementing its approved Sub regional NCCP. The SDG&E NCCP commits SDG&E to implement operational protocols to avoid and minimize potential impacts to sensitive resources, and to provide mitigation for habitat impacts.

SDG&E proposes to construct, reconductor, and operate a new, approximately 12-mile 69kV overhead electric transmission line between Escondido Substation and San Marcos Substation (Project). The Project will consist of three primary segments: Segment 1 consists of rebuilding approximately 2.0 miles of existing facilities, Segment 2 consists of an addition of approximately 2.8 miles of new facilities within an existing SDG&E corridor, and Segment 3 consists of reconductoring approximately 7.4 miles of de-energized transmission line. The Project would occur within the cities of Carlsbad, Escondido, Vista, and San Marcos, as well as the unincorporated County of San Diego.

Mr. David D. Davis
Environmental Science Associates
May 30, 2019
Page 2 of 4

The Project proposes to permanently impact a total of 2.0 acres of habitat and temporarily impact 79.4 acres of habitat. Of these total impacts, there will be 0.8 acre of permanent impacts to Diegan coastal sage scrub, 0.3 acre of permanent impacts to southern maritime chaparral, 0.7 acre of temporary impacts to Diegan coastal sage scrub, 0.3 acre of temporary impacts to southern maritime chaparral, 0.01 acre of temporary impacts to non-native grassland, and 0.01 acre of temporary impacts to southern riparian forest. Use of the SDG&E NCCP or Low Effect Habitat Conservation Plan (LEHCP) is proposed for mitigation of Project-related impacts in Mitigation Measure (MM) BIO-1.

CDFW offers the following comments and recommendations to assist the CPUC and SDG&E in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources, and to ensure that the Project is consistent with all applicable requirements of SDG&E's approved NCCP.

- | | |
|---|---|
| <p>1. Section 2.5.9 of the IS/MND discusses belowground construction and trenching methods. Please ensure measures that exclude wildlife or enable trapped wildlife to escape are incorporated into the Project as stated in the SDG&E NCCP operational protocol numbers 37 and 38.</p> |  <p>A2-1</p> |
| <p>2. Applicant Proposed Measure (APM) BIO-3 states that, "Except when not feasible due to physical or safety constraints, all Project construction vehicle movement will be restricted to the Project work areas, existing roads, and access roads constructed as part of the Project and mapped by SDG&E in advance of construction." It is recommended that all vehicles, Project equipment, and Project personnel are restricted within the designated Project areas to avoid any and all unanticipated impacts to biological resources in proximity to the Project areas. If it is required that an activity takes place outside of the project work areas due to physical or safety constraints, then the biological monitor should document all permanent or temporary impacts associated with those activities so they can be presented in the Post Construction Report. Furthermore, this allows proper mitigation or restoration of the affected areas to be applied as required in the SDG&E NCCP.</p> |  <p>A2-2</p> |
| <p>3. Per APM BIO-5, "Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist". The Department recommends that all sensitive habitats and jurisdictional resources in proximity to the Project areas also be posted, flagged, or fenced to exclude Project personnel, material, and equipment from habitat areas not designated for impacts.</p> |  <p>A2-3</p> |
| <p>4. APM BIO-7 states that if a raptor nest is observed during preconstruction surveys, a qualified biologist would determine if it is active and that if the monitor determines that the Project activities are disturbing or disrupting the</p> |  <p>A2-4</p> |

Mr. David D. Davis
Environmental Science Associates
May 30, 2019
Page 3 of 4

nest, the monitor will make recommendations to reduce noise and/or disturbance to the nest. The Department recommends that if an active raptor or avian nest has been observed and identified in proximity to Project activities and is being disturbed, then the Project activities should cease in the area and an appropriate buffer per MM BIO-2 should be evaluated and applied by the appointed biological monitor.

A2-4
(cont.)

5. Per MM BIO-2, "The biological monitor shall establish a three-dimensional cylinder-shaped buffer around active nests that have the potential to be affected by helicopter use or ground-based activities associated with helicopter use." While the measure specifically calls for buffer implementation during Project activities relating to helicopter use and ground-based Project activities associated with helicopter use, general construction noise and most Project activities also have the potential to cause adverse effects on nesting behavior, nesting activity, and nesting success. The Department recommends that the proposed mitigation measure MM BIO-2 apply to all Project-related activities (ground or air) with the potential to negatively influence any nesting or breeding activities regardless of time spent in the vicinity of the nest. Also, appropriate nest buffers should be determined and applied by the observations and professional judgement of the on-site qualified biological monitor to minimize any and all impacts to active nest locations. Furthermore, the Department recommends that aircraft not be flown above observed active nest locations; currently the proposed mitigation measure calls for vertical buffers of 300 feet and 500 feet for passerine and raptor species, respectively; however, helicopters and other Project aircraft should be rerouted around sensitive areas to avoid impacts to nesting or breeding activities.

A2-5

6. Please provide information regarding the location of the documented wart-stemmed ceanothus and Nuttall's scrub oak. While the IS/MND and included Biological Technical Report (BTR) both quantitatively documented the potential permanent and temporary impacts to each species, there is no information in either report documenting the specific locations of the proposed permanent or temporary impacts to either species. The Department recommends providing this information in a Pre-activity Survey Report as required by the SDG&E NCCP so that reductions in impacts or avoidance and minimization measures to these sensitive species can be explored in discussion with both the Department and the United States Fish and Wildlife Service at a later date. If impacts cannot be avoided or further reduced, then the habitat and sensitive species in proximity to the Project area should be flagged, fenced, and avoided during construction activities. Also, if impacts on sensitive plant species are unavoidable, SDG&E should perform soil and plant salvage or translocation activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of their NCCP.

A2-6

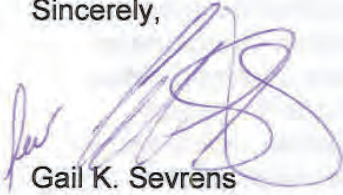
Mr. David D. Davis
Environmental Science Associates
May 30, 2019
Page 4 of 4

7. Per the BTR page 3-18, biological surveys were not completed at, between, or around Locations 103 and 104 due to ongoing private construction. Providing a complete record of the biological resources encountered throughout the project area is necessary to ensure that the Department can provide proper comments and recommendations. According to the information provided in the BTR, these two locations were determined to have the potential for both Nuttall's scrub oak and wart-stemmed ceanothus. Without completed surveys at these two locations the determination that no significant impacts to either species will occur is not supported. The Department recommends that the resource surveys be completed at locations 103 and 104 prior to issuance of a Notice to Proceed by the CPUC.

A2-7

We appreciate the opportunity to comment on the subject IS/MND. If you have questions regarding this letter, please contact Environmental Scientist Patrick Tilley at (858) 467-4237 or patrick.tilley@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager

ec: Karen Goebel, USFWS
State Clearinghouse

Letter A2: California Department of Fish and Wildlife

- A2-1 As noted in Applicant-Proposed Measure (APM) BIO-1 in Section 3.4.3 of the Draft IS/MND, all construction and maintenance activities would be conducted in accordance with Operational Protocols in SDG&E's 1995 Subregional Natural Community Conservation Plan (NCCP) including numbers 37 and 38, which require exclusion of wildlife or enabling trapped wildlife to escape. The APMs will be included in CPUC's Mitigation Monitoring, Reporting, and Compliance Program (MMRCP; see Final IS/MND Chapter 4) to ensure that these measures are implemented.
- A2-2 NCCP Operational Protocol number 1 requires that vehicles be kept on access roads and turned around in established or designated areas only, and NCCP Operational Protocol number 14 requires that the Environmental Surveyor flag boundaries of habitats that must be avoided and demark work areas. The Project would comply with these protocols, as required in APM BIO-1. Additionally, APM BIO-3 requires approval from a biological monitor prior to vehicle travel off existing roads. APMs BIO-1 and BIO-3 have been incorporated into the Project's MMRCP to ensure these measures are implemented. As required in the MMRCP, the CPUC's mitigation monitor is responsible for inspecting compliance with these APMs and ensuring that all procedures specified in the MMRCP are followed. As part of the MMRCP's reporting process, SDG&E is required to provide the CPUC with written quarterly reports of the Project documenting progress of construction, resulting impacts, mitigation implemented (including APMs), and all other noteworthy elements of the Project. This would document all permanent or temporary impacts, including those mentioned in this comment for presentation in the Post Construction Report and allow for proper application of mitigation or restoration as required in the SDG&E NCCP.
- A2-3 NCCP Operational Protocol number 14 requires determining the extent of habitat and flagging boundaries of habitat which must be avoided. The Project would comply with this protocol. Additionally, Mitigation Measure BIO-3 found in Section 3.4.4 of the Draft IS/MND requires flagging work area limits and installing silt fencing in the proximity of jurisdictional resources, as well as monitoring by a qualified biologist.
- A2-4 As described in APM BIO-7, the biological monitor would make recommendations to reduce noise and/or disturbance if it is determined a nest is being substantially adversely affected. Recommendations may include ceasing construction activity and/or establishing buffers where no work would occur, as appropriate to reduce nest disturbance. As noted in this comment, Mitigation Measure BIO-2 provides guidance as to buffer definition. CPUC has made clear in the MMRCP that SDG&E and its contractors shall implement these recommendations, and CPUC mitigation monitors shall inspect compliance to ensure the resource would not be impacted.
- A2-5 APM BIO-7 applies to all Project activities with a potential to impact nesting birds and raptors. As described in APM BIO-7, the biological monitor would make recommendations to reduce noise/and or disturbance if it is determined a nest is being substantially adversely affected. Recommendations may include ceasing construction

activity and/or establishing buffers where no work would occur, as appropriate to reduce nest disturbance. CPUC has made clear in the MMRCP that SDG&E and its contractors shall implement these recommendations, and CPUC mitigation monitors shall inspect compliance. CPUC elects to retain the applicability of Mitigation Measure BIO-2 to helicopter use and activities associated with helicopter use.

Mitigation Measure BIO-2 requires not only vertical buffers, but horizontal buffers as well, effectively rerouting helicopters horizontally to at least 500 feet away from raptor nests, at least 0.5 mile away from white-tailed kit nests, and at least 300 feet away from all other nests. As noted in the mitigation measure, the biological monitor has the authority to establish greater buffers based on observations and professional judgment about the nature of the work, in order to provide sufficient separation.

A2-6 NCCP Operational Protocol number 13, with which the Project would comply as a requirement of APM BIO-1, requires conducting a pre-activity survey (and surveys and documentation to determine location of special-status plants like wart-stemmed ceanothus and Nuttall's scrub oak); therefore, the precise locations of these documented plants would be provided in the pre-activity survey report as requested in the comment. Additionally, the Project would also comply with Operational Protocol number 14, which requires determining the extent of habitat and flagging boundaries of habitat which must be avoided. Finally, Mitigation Measure BIO-3 found in Section 3.4.4 of the Draft IS/MND requires flagging work area limits and installing silt fencing in the proximity of jurisdictional resources, as well as monitoring by a qualified biologist. The NCCP governs the mitigation requirements for take of special-status plant species in accordance with the federal and California Endangered Species Acts, and Mitigation Measure BIO-1 ensures that in the event that sufficient take credits are not available at the time of construction, any take of special-status plants (or animals) would be mitigated under conditions at least as effective as the NCCP requirements (i.e., Section 7.2, Habitat Enhancement Measures).

A2-7 The Project would comply with NCCP Operational Protocol number 13, as required by APM BIO-1, which requires conducting a pre-activity survey (and surveys and documentation to determine location of special-status plants like wart-stemmed ceanothus and Nuttall's scrub oak). This requirement would ensure that previously unsurveyed locations, such as structure locations 103 and 104, would be surveyed and biological resources reported. CPUC has made clear in the MMRCP that SDG&E shall complete pre-activity surveys and reporting prior to receiving an NTP for ground-disturbing work.

STATE CAPITOL
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(916) 319-2075
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E-MAIL
Assemblymember.Waldron@assembly.ca.gov

Assembly California Legislature



MARIE WALDRON
ASSEMBLY REPUBLICAN LEADER
ASSEMBLYMEMBER, SEVENTY-FIFTH DISTRICT

Letter A3
DISTRICT OFFICE
350 W. 5TH AVENUE, SUITE 110
ESCONDIDO, CA 92025
(760) 480-7570
FAX (760) 480-7516

May 28, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
C/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste 200
Petaluma, CA 94954

Re: SDG&E's Proposed TL6975 Project

As the Assemblymember serving San Marcos in the California Assembly, I would like to join many San Marcos constituents and the City of San Marcos, who have expressed concerns about SDG&E's proposed powerline project, referenced above. While I recognize the need for additional power supply and increased electric reliability for San Diego's growing North County, I share my constituents' concerns about the project's impacts and the need for more thorough environmental review, including an EIR.

I am encouraging SDG&E to consider all alternatives in lieu of the proposed overhead alignment currently under consideration. As many of my constituents have articulated, the project as proposed increases visual, noise and overall quality of life impacts on the surrounding communities. It is my recommendation that SDG&E work with the California Public Utilities Commission to come up with a better alternative to the current overhead proposal through the City of San Marcos. We deserve another analysis by your highly trained staff of this major project.

In closing, I appreciate the outreach that has already taken place within the community and would encourage SDG&E to continue to keep an open dialogue with area residents throughout this process.

Thank you in advance for your prompt attention to these concerns. Please keep my office informed of all decisions and key regulatory milestones as this process moves forward.

Sincerely,

A handwritten signature in blue ink that reads "Marie Waldron".

Marie Waldron
Assembly Republican Leader

A3-1

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 2, 2019

Honorable Marie Waldron
California State Assembly
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0075

SUBJECT: Response to Letter Regarding SDG&E San Marcos to Escondido TL6975 69kV Project

Dear Assemblymember Waldron:

Thank you for your May 28, 2019 letter regarding the San Diego Gas & Electric (SDG&E) San Marcos to Escondido TL6975 69kV Project (Project). We appreciate your role and dedication in representing the residents of the 75th Assembly District, the boundaries of which include the project area under review.

The CPUC released the Project's Initial Study and proposed Mitigated Negative Declaration on April 1, 2019 for an extended 60-day public and agency review process. Anticipating the public's concern about the Project, two open public meetings were conducted in San Marcos on April 30, 2019. Both meetings were well attended. Public input was transcribed by a court reporting service, and additional comments were collected on comment cards. Nearly 80 comment letters were received from the community, public agencies, and interested parties. The CPUC also launched an on-line comment platform that was active throughout the 60-day comment period. Over 1,040 entries were collected.

The CPUC is currently reviewing these comments. A substantial number of the comments suggested an environmental impact report (EIR) be prepared for the Project. Our environmental team is revisiting its analyses in light of the information received during the review period before finalizing the CEQA document. This review will determine the next steps in our CEQA process. In accordance with CEQA Guidelines 15063 and 15064, if it is confirmed that all potentially significant environmental impacts *attributable to the Project* can be reduced to a less-than-significant level through the implementation of the Applicant Proposed Measures (APMs) and/or reasonable and practicable mitigation measures put forth by the CPUC as Lead Agency, we would likely proceed with the Mitigated Negative Declaration. On the other hand, if the information collected since release of the CEQA document for review indicates the potential for one or more impacts that cannot be reduced below significance thresholds, the CPUC would consider preparation of an EIR. In that case, this public review process recently completed would inform the CPUC's consideration of the range of issues, mitigation measures, and alternatives to address that analysis.

In continuing our outreach process, the CPUC and its environmental consultant met with representatives of the City of San Marcos on July 16, 2019. City representatives included staff members from the Development Services/Planning Department, Public Works Department, and San Marcos Fire Department. CPUC updated its City partners on the Project's review process, answered questions, and listened to the City's input and concerns regarding the Project. The CPUC will take the information under consideration during next steps in the CEQA process.

Response to Letter Regarding SDG&E San Marcos to Escondido TL6975 69kV Project
August 2, 2019

We have added your contact information to the Project's mailing database for the CEQA process. All CEQA process documentation is available here:

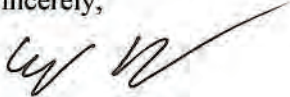
<https://www.cpuc.ca.gov/environment/info/esa/TL6975/index.html>

Interested parties can request to be included on the Project's CEQA process notification list by contacting us at TL6975SanMarcos@esassoc.com or (619) 719-4207.

To participate in the formal proceeding, your constituents may follow the instructions available here: https://www.cpuc.ca.gov/party_to_a_proceeding/. (Please note the spaces are underscores.)

Thank you again for expressing your interest in the SDG&E San Marcos to Escondido TL6975 69kV Project. We hope you find this information helpful. We look forward to working with you as we proceed with our independent evaluation of the Project. Please do not hesitate to call Joyce Steingass at (415) 703-1810 if you have any questions.

Sincerely,



Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: CPUC Commissioners

Mary Jo Borak, Program and Project Supervisor, Energy Division, CPUC
David D. Davis, AICP, Environmental Science Associates
Hazel Miranda, Director, Office of Governmental Affairs, CPUC
Terrie Prosper, Director, News and Outreach, CPUC
Joyce Steingass, Utilities Engineer, Energy Division, CPUC
Molly Sterkel, Program Manager, Energy Division, CPUC

Letter A3: California State Assembly Member Marie Waldron

In addition to the responses provided below, the CPUC replied to Assemblymember Waldron by letter on August 2, 2019. The CPUC letter is provided following Assemblymember Waldron's letter.

- A3-1 With respect to the request to prepare an EIR and to consider alternatives to the Project, please see Master Response 4, CEQA Process, in Final IS/MND Section 2.3.4. Assemblymember Waldron's office will receive all future public notifications about the Project from CPUC.

DEPARTMENT OF TRANSPORTATION

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 4050 TAYLOR STREET, MS-240
 SAN DIEGO, CA 92110
 PHONE (619) 688-6075
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www.dot.ca.gov



Making Conservation
 a California Way of Life.

May 15, 2019

11-SD-15, 78
 PM VAR

CPUC SDG&E San Marcos to Escondido Tie Line 6975 69kV Project
 MND/SCH#2019049009

Ms. Joyce Steingass
 California Public Utilities Commission
 505 Van Ness Avenue
 San Francisco, CA 94102

Dear Ms. Steingass:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the CPUC SDG&E San Marcos to Escondido Tie Line 6975 69kV located near Interstate 15 (I-15) and State Route (SR-78). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Right-of-Way Utilities

It is also understood by our agency that no new utility crossings on State Facilities will occur as a result of this project. However, any work performed within Caltrans' right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

Please see Chapter 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/trafficops/ep/manual.html>

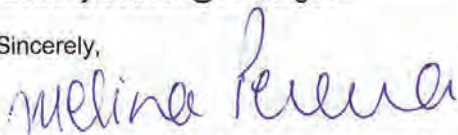
Please see Chapter 17 of the Plan Preparation Manual for requirements regarding utilities and state R/W: <http://www.dot.ca.gov/design/cadd/manuals/ppm.html>

A4-1

Ms. Joyce Steingass
May 15, 2019
Page 2

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Melina Pereira". The signature is fluid and cursive, with the first name "Melina" and last name "Pereira" clearly distinguishable.

MELINA PEREIRA, Acting Branch Chief
Local Development and Intergovernmental Review Branch

Letter A4: California Department of Transportation

- A4-1 The CPUC acknowledges Caltrans' authority to require discretionary review and approval for any work that may be performed within Caltrans' right-of-way (ROW). To date, SDG&E has not proposed any such work. In the event that a Caltrans encroachment permit is required, additional CEQA review of work within Caltrans' ROW would be needed.

Center for Natural Lands Management

A non-profit organization for the protection and management of natural resources

27258 Via Industria, Suite B
Temecula, CA 92590-3751
Phone: 760.731.7790
Fax: 760.731.7791
www.cnlm.org



Letter A5

May 30, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

Via email and Website: TL6975SanMarcos@esassoc.com and
<http://comment-tracker.esassoc.com/tracker/tl6975/>

SDG&E San Marcos to Escondido TL6975 69kV Project San Diego, California

To Whom This May Concern:

The Center for Natural Lands Management owns and manages Habitat Conservation Areas (HCA), which were set aside for the protection of endangered species and habitats, within many parcels which are subject to proposed impacts of the New Build (Segment 2) area of the upcoming CPUC SDG&E San Marcos to Escondido TL6975 69kV Project. There are many sensitive, threatened, and endangered plant and animal species that reside on the HCA that we are concerned would be impacted by the construction and/or implementation of this project. We would like SDG&E to perform an EIR and develop a more suitable alternative that would not have such a path through the HCA.

A5-1

The following APNs are proposed to be impacted by the project: 223-651-1700, 223-651-0900, 223-651-2200, 223-651-2500, 223-651-2600, 223-030-8000, 223-030-8300, 223-030-7900, 223-030-4900, 223-030-4800. There are a multitude of sensitive wildlife species which have been documented to reside, roost, nest, and forage within the proposed project area for which we have concerns about potential impacts. These species have been recorded in California's Natural Diversity Database as well as CNLM's internal GIS system for more than 15 years. The following species of special concern have been documented in our GIS database in this area according to CNLM's work from 1998 to present:

A5-2

- Coastal California Gnatcatcher (*Poliophtila californica californica*) (federally threatened, state endangered)
- Pocketed free-tail bat (**roosting**) (*Nyctinomops femorosaccus*) (State species of special concern)

Center for Natural Lands Management

A non-profit organization for the protection and management of natural resources

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Temecula, CA 92590-3751
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Fax: 760.731.7791
www.cnlm.org



- Least Bell's Vireo (*Vireo bellii pusillus*) (federally threatened, state endangered)

Other species that CNLM considers sensitive and of importance that have been documented within the project are:

- Cooper's Hawk (*Accipiter cooperii*)
- Gilbert's Skink (*Plestiodon gilberti*)
- Great horned owl (**nesting**) (*Bubo virginianus*)
- Loggerhead shrike (*Lanius ludovicianus*)
- Orange-throated Whiptail (*Cnemidophorus hyperythrus beldingi*)
- Peregrine Falcon (*Falco peregrinus*)
- Red tailed hawk (**nesting**) (*Buteo jamaicensis*)
- Coast horned lizard (*Phrynosoma coronatum*)
- Rufous crowned sparrow (*Aimophila ruficeps*)
- Yellow-breasted chat (*Icteria virens*)
- Yellow warbler (*Setophaga petechia*)
- Wart-stemmed ceanothus (*Ceanothus verrucosus*)
- Summer Holly (*Comarostaphylis diversifolia*)

CNLM would like the CPUC to consider the proposed alternative locations for these updates to the transmission line instead of this placement through the Habitat Conservation Areas. We are concerned that the construction and implementation of this project would have deleterious impacts to the sensitive wildlife species that reside on the HCA. Please contact me with further questions.

Sincerely,

Sarah Godfrey
Preserve Manager
760-300-3187

A5-2
(Cont.)

A5-3

Letter A5: Center for Natural Lands Management

- A5-1 The request for an EIR is acknowledged. Please see Master Response 4, CEQA Process.
- A5-2 The Center for Natural Lands Management's concerns are acknowledged. The species of concern listed in the comment have either been included specifically for consideration within the Draft IS/MND, or occur within habitats that are discussed within the Draft IS/MND. Thus, the Draft IS/MND evaluates all potential Project-related impacts on these species, and APMs proposed and Mitigation Measures required in the Draft IS/MND address potential impacts on these species.
- A5-3 The request to consider alternatives is acknowledged. Please see Master Response 4, CEQA Process.

May 24, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Suite 200
Petaluma, CA 94954

**SUBJECT: COMMENTS ON DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND)
FOR THE SDG&E SAN MARCOS TO ESCONDIDO TIE LINE (TL) 6975 69kV PROJECT (A.17-
11-010)**

Dear Mr. Davis:

The City of Carlsbad received the Notice of Intent to adopt an IS/MND for the above-referenced project, dated April 1, 2019, and we appreciate the opportunity to provide the following comments.

3.4 BIOLOGICAL RESOURCES. For questions regarding comments on this section, or to communicate and coordinate on activities within or near Carlsbad preserve areas, please contact Rosanne Humphrey, HMP Coordinator, Rosanne.Humphrey@carlsbadca.gov, (760) 602-4689.

1. Page 3.4-20 - Please add Palomar Forum to the list of preserve areas. A location map of the Carlsbad preserves in the biological study area is attached. A6-1
2. Page 3.4-27, 3.4.2 Regulatory Setting. The discussion of City of Carlsbad goals, policies, plans and ordinances relevant to biological resources lacks a description of the Carlsbad Habitat Management Plan (HMP). The HMP, originally adopted in 1999, and fully approved by federal and state wildlife agencies in 2004, is the city's comprehensive program for preserving the diversity of habitat and protecting sensitive species throughout the city. As correctly noted on the preceding page, the HMP constitutes the Carlsbad subarea plan under the umbrella North County Multiple Habitat Conservation Plan, and to date is the only approved and enforceable MHCP subarea plan in north San Diego County. The Carlsbad HMP contains conservation goals and standards for biological resources in portions of the project area. Please expand the local regulatory setting discussion to include a description of the Carlsbad HMP, its purpose and relationship to the project. Also, please expand this section to include the following relevant General Plan policies and local ordinance: A6-2
 - **City of Carlsbad General Plan Open Space, Conservation and Recreation Element (2015) policies**
 - **4-P.9** Maintain and implement the city's Habitat Management Plan (HMP), including the requirement that all development projects comply with the HMP and related documents. Require assessments of biological resources prior to approval of any development on sites with sensitive habitat, as depicted in Figure 4-3.

CITY OF CARLSBAD COMMENTS ON DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND)
FOR THE SDG&E SAN MARCOS TO ESCONDIDO TIE LINE (TL) 6975 69kV PROJECT (A.17-11-010)

May 24, 2019

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- **4-P.12** Continue participation in regional planning efforts to protect habitat and environmentally sensitive species.
 - **4-P.15** Maintain functional wildlife corridors and habitat linkage in order to contribute to regional biodiversity and the viability of rare, unique or sensitive biological resources throughout the city.
 - **Carlsbad Municipal Code Chapter 21.210 – Habitat Preservation and Management Requirements.** The purposes and intent of this chapter are to:
 - Implement the goals and objectives of the land use and the open space/conservation elements of the Carlsbad general plan
 - Implement the city's habitat management plan, the implementing agreement and conditions, the North County multiple habitat conservation plan (MHCP), the state's Natural Communities Conservation Plan (NCCP) and 10(a)1(B) permit conditions;
 - Preserve the diversity of natural habitats in the city and protect the rare and unique biological resources located within those habitats;
 - Assure that all development projects comply with the habitat preservation and conservation standards contained in the habitat management plan;
 - Provide a process for permitting limited, incidental impacts to occur to natural habitat areas and the species located therein; and
 - Provide a process for allowing minor amendment from the habitat preservation and conservation standards under limited, specified circumstances.
- 3. Page 3.4-30 – The MND states that SDG&E intends to utilize mitigation credits authorized under the 2017 ITP to mitigate for impacts on sensitive habitats for the project. Please disclose whether there will be impacts to lands within the Carlsbad HMP that would be mitigated in this manner, and explain how such mitigation is consistent with the Carlsbad HMP. In the alternative, the city prefers that mitigation for all impacts within Carlsbad be done consistent with the Carlsbad HMP to avoid potential conflicts with implementation and management of the citywide preserve system.
- 4. Page 3.4-34 – The MND states that permanent and temporary impacts would occur to the Carrillo Ranch Reserve and Carlsbad Raceway Open Space Preserve within Carlsbad, but does not identify what the impacts are. Please disclose the nature and extent of the impacts to these preserves, and the mitigation proposed. Since these preserves are covered in the Carlsbad HMP, the city requests that SDG&E mitigate any unavoidable impacts to these preserves consistent with HMP policies and standards. Also, please clarify what impacts, if any, would occur on the Palomar Forum preserve.
- 5. Page 3.4-49 – Regarding potential conflict with local policies and ordinances (Question (e)), please re-evaluate this analysis and conclusion light of our comment above to include relevant General Plan conservation policies and Municipal Code Chapter 21.210 regarding implementation of the Carlsbad HMP. In particular, please analyze whether application of any of the proposed SDG&E NCCP protocols, mitigation or management actions would conflict with or adversely affect the city's implementation of the Carlsbad HMP. For example, the MND states that SDG&E intends to mitigate for certain impacts by deducting credits from the SDG&E NCCP mitigation bank; however, the mitigation bank is not in the Carlsbad HMP preserve system.
- 6. Night time lighting should be shielded away from habitat areas.

A6-2
(Cont.)

A6-3

A6-4

A6-5

A6-6

CITY OF CARLSBAD COMMENTS ON DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND)
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7. Business Park Drive and Palomar Airport Rd intersection: One of the potential staging areas is adjacent to the Carlsbad Raceway preserve. We request that placement and operation of the staging areas follow applicable adjacency standards in the Carlsbad HMP, Section F.3. The other two potential locations are close enough that adjacency standards should also be followed, if possible. Among the three candidate sites, use of the staging area adjacent to Carlsbad Raceway is the least preferred location from a Carlsbad HMP management perspective.

A6-7

8. We note that construction would occur adjacent to the Palomar Forum and Carrillo Ranch Preserves, and therefore request that such construction activity follow applicable adjacency standards in the Carlsbad HMP, Section F.3.

A6-8

9. The MND refers to implementing procedures intended to minimize impacts associated with the spread of noxious weeds. Please note that the staging and construction areas in Carlsbad are very close to the known infestation of Ward's weed. This is a species new to North America, and the City of Carlsbad is working with a regional coalition of agencies and organizations to stop the spread of this weed and eradicate it before it spreads beyond the city and county. Please add special considerations for this species such as making sure onsite personnel know how to identify the species and strictly implement BMPS such as washing all equipment, vehicles (including tires), clothing and boots before entering or leaving the site. Ideally, a survey for the species would be conducted by a qualified biologist prior to any project work, including installation of temporary construction fencing, vegetation removal, equipment staging, and so forth. Such special considerations could be incorporated into mitigation measure BIO-2.

A6-9

3.16 RECREATION. For questions regarding comments on this section, or to communicate and coordinate on activities affecting Carlsbad trails, please contact Kasia Trojanowska, Park Planning Manager, Kasia.Trojanowska@carlsbadca.gov, (760) 434-2838.

10. Page 3.16-3 – Please correct Table 3.16-1 and the trails discussion to include the Rancho Carrillo Trail within the City of Carlsbad, the eastern extent of which is within Segment 2 of the project area. A location map of this trail (11.4) is attached.

A6-10

11. 3.16.2 Regulatory Setting. Please expand this section to include:

- City of Carlsbad General Plan Open Space, Conservation and Recreation Element (2015) policies:
- **4-P.40** Prepare a comprehensive Trails Master Plan update, that expands the existing and planned 61-mile trail system, with the following objectives:
 - Connectivity between off-road trails and major on-road pedestrian and bicycle routes, such that future improvements in the trail system also contribute to linkages between important sites (beaches, lagoons, schools, commercial centers, master planned communities, and others)
 - Design and designate trails as multi-use to be accessible for all user groups, including walkers, bicyclists, and equestrians (as land use policy allows). Ensure that the network provides an appropriate amount of resources for each trail type or user group

A6-11

CITY OF CARLSBAD COMMENTS ON DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION (IS/MND) FOR THE SDG&E SAN MARCOS TO ESCONDIDO TIE LINE (TL) 6975 69kV PROJECT (A.17-11-010)

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- Greenway and trail linkages from major recreational/open space areas to other land use areas or activities, including, but not limited to, residential neighborhoods, places of employment, parks, schools, libraries, and viewpoints
- Linkages/multi-use trails connecting businesses and residential neighborhoods to the beaches
- **4-P.41** Participate with other north county communities to establish an intercommunity open space linkage program and regional trail network.
- **4-P.42** Locate multi-use trails and associated amenities and passive recreational features to minimize impacts to sensitive habitats and other sensitive surrounding land uses, such as residences.
- **4-P.43** Obtain an irrevocable offer to dedicate or a permanent easement for multi-use trails on privately owned property where feasible, and where trails are proposed as part of the Carlsbad trail system.
- Draft Trails Master Plan, which is described in General Plan Policy 4-P.40 above.

A6-11
(Cont.)

12. It appears that construction activity could temporarily disrupt access to the Rancho Carrillo Trail. Please update extend the proposed public notification measures to the Carlsbad trail and notify the City of Carlsbad in advance of such closures.

A6-12

Finally, to assist SDG&E in public communications efforts, the city would appreciate being kept apprised of the project's scheduled construction activities within and near Carlsbad, particularly any activities that would require special traffic control, work within the city's right-of-way, night-time or weekend activities, McClellan-Palomar Airport-based helicopter operations, or construction or blasting activities that will generate noise impacts to our residents. Please coordinate communications with Sarah Lemons, Community Relations Manager, Sarah.Lemons@carlsbadca.gov, (760) 434-2960.

A6-13

If you other questions regarding this comment letter or need further information, please contact me, David.Decordova@carlsbadca.gov, (760) 602-4604.

Sincerely,

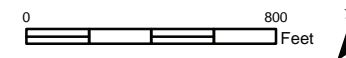


DAVID DE CORDOVA
Principal Planner

c: Rosanne Humphrey, HMP Coordinator
Kasia Trojanowska, Park Planning Manager
Sarah Lemons, Community Relations Manager



HMP Hardline Preserves



Subarea 11: Bressi Ranch & Rancho Carrillo Ranch

Leo Carrillo Ranch Historic Park anchors this subarea. The long east/west canyon that parallels Poinsettia Lane is a dominant landform for the area. The new Alga Norte Community Park and Swim Center became an important recreational amenity and destination in this subarea (see Figure 4.12 “Trail Subarea 11 Map”).

Subarea 11 General Description: The primary focus of this subarea is to maintain the existing open space and trails of the Leo Carrillo Ranch Historic Park and a loop around this unique Carlsbad treasure. Multiple trails exist around the new Alga Norte Community Park that lead you to vista points. Poinsettia Lane Trail serves as the backbone trail from El Camino Real eastward along the north side of this major city transportation route.

Destinations: Alga Norte Community Park and Swim Center, Leo Carrillo Ranch Historic Park, schools, and Bressi Ranch Shopping Center, commercial businesses and Tri-City Fitness Center.

Range of Difficulties: The landforms vary and include steeper trails and bikeways.

Range of Surface Types: The trails include decomposed granite and concrete, native soil, and some hard surface such as asphalt.

Possible Loops: Several existing loops can be taken around both Carrillo Ranch and Alga Community Norte Park.

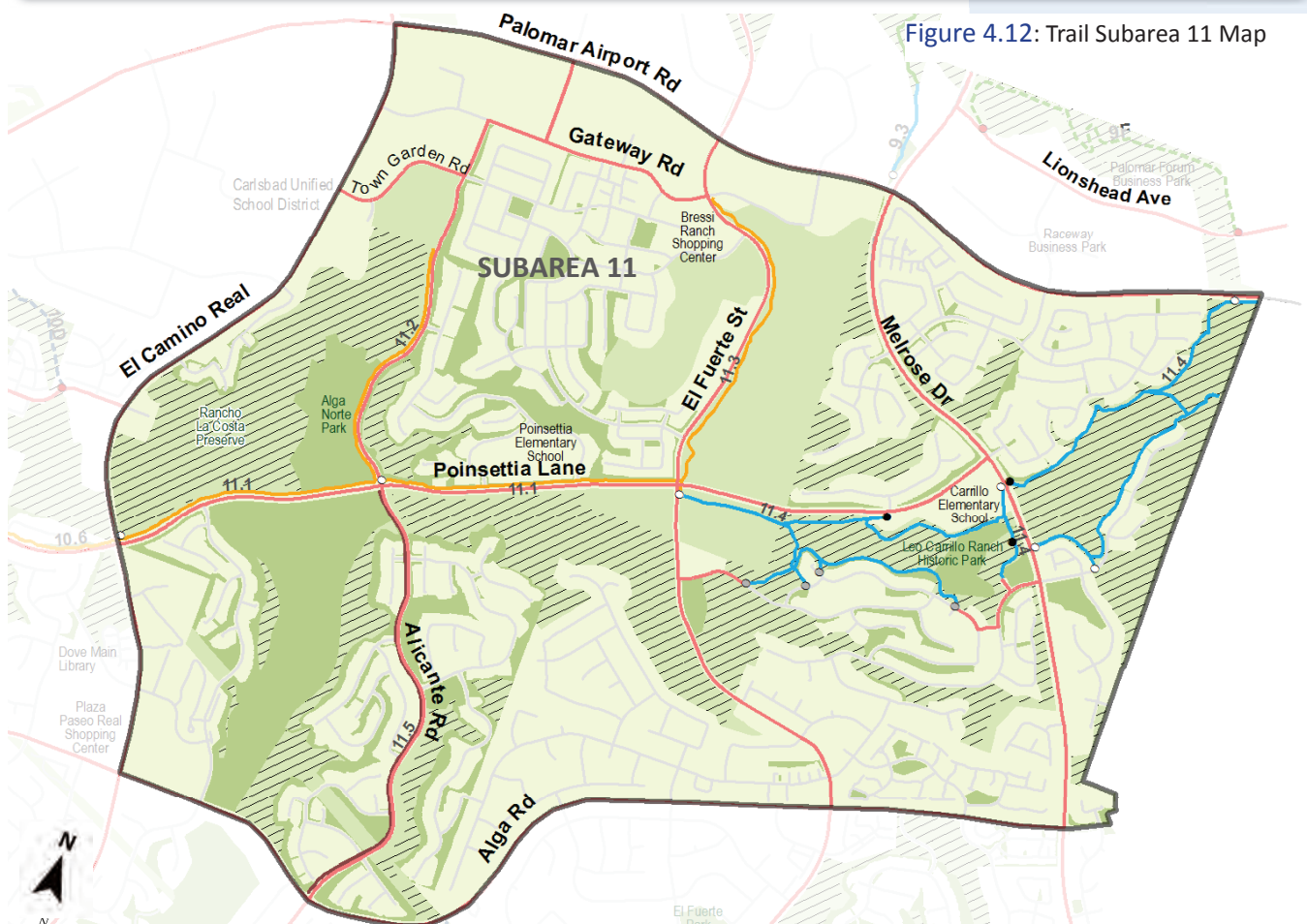
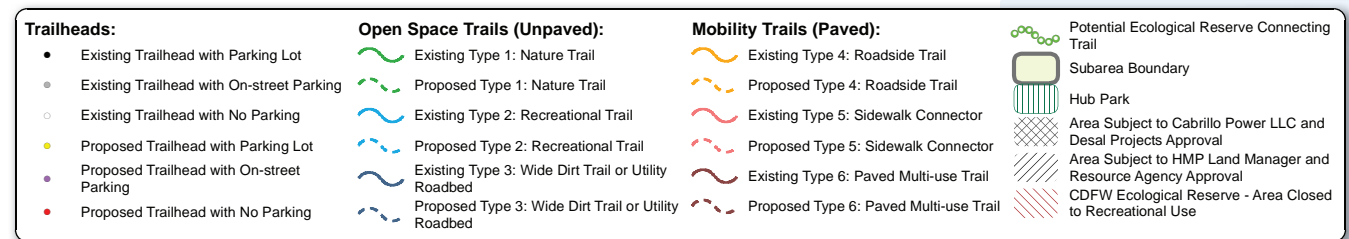


Figure 4.12: Trail Subarea 11 Map

Letter A6: City of Carlsbad

- A6-1 The list of preserve areas in Draft IS/MND Section 3.4.1 on page 3.4-20 has been revised to include Palomar Forum as a preserve area.
- A6-2 The Carlsbad Habitat Management Plan (HMP) is addressed in the Draft IS/MND under the San Diego County Multiple Habitat Conservation Program (MHCP) discussion within Section 3.4.2 (page 3.4-26). The Project would occur within the area covered by, and would follow the requirements of, the SDG&E Subregional NCCP and Low Effect HCP. SDG&E's existing NCCP and HCP supersede the County of San Diego Multiple Species Conservation Program (MSCP) and approved City and County Subarea Plans and, therefore, are the only conservation plans that apply to the Project. The CPUC acknowledges the City of Carlsbad's General Plan policies and municipal code requirements related to the City's implementation of its HMP. However, as these policies are superseded by SDG&E's existing NCCP and HCP and do not inform the analysis of environmental impacts in the Biological Resources section of the Draft IS/MND, they have not been described independent of the County's MHCP in the Regulatory Setting. Mitigation Measure BIO-1 would ensure that the Project complies with the federal and California Endangered Species Acts, and would reduce potential impacts on special-status species to less than significant.
- A6-3 See Response to Comment A6-2 regarding the applicability of SDG&E's NCCP and HCP and inapplicability of other conservation plans to all of SDG&E's activities relating to the siting, design, installation, construction, use, maintenance, repair, and removal of its facilities within the Subregional NCCP area (this includes all Project activities).
- A6-4 The Carrillo Ranch Reserve and Carlsbad Raceway Open Space Reserve are identified in the discussion of Preserve Areas within Draft IS/MND Section 3.4.1, Existing Conditions (Biological Resources). Temporary and permanent impacts that would occur on these reserves are shown on SDG&E maps provided in Final IS/MND Appendix E. The Palomar Forum Reserve is not identified on this mapping, but the junction of Segments 1 and 2 are located in the eastern-most point of this parcel. The discussion of Preserve Areas has been revised to include this reserve (see Chapter 3 of this Final IS/MND). Impacts to biological resources in the Draft IS/MND are described at a Project-level and not discussed per preserve area. Regarding the request to mitigate for impacts consistent with the Carlsbad HMP, see Response to Comment A6-2.
- A6-5 See Response to Comment A6-2 regarding the applicability of SDG&E's NCCP and HCP and inapplicability of other conservation plans to the Project.
- A6-6 As noted in Section 3.4.4 of the Draft IS/MND, nighttime lighting impacts would be temporary, short-term, and located in only a few work areas at a time during Project construction. No impacts are expected to result in a long-term decline of special-status species.

- A6-7 The CPUC acknowledges the City of Carlsbad's preference for the locations of staging areas; however, please see Response to Comment A6-2 regarding the applicability of SDG&E's NCCP and HCP and inapplicability of other conservation plans to the Project.
- A6-8 Please see Response to Comment A6-2.
- A6-9 The CPUC acknowledges information provided about Project site proximity to a known infestation of Ward's weed (*Carrichtera annua*) and has incorporated information from Calflora on identified occurrences into the Project record (Calflora, 2019). APM BIO-2 requires that all earth-moving equipment be free of mud and vegetative material before being mobilized onto Project work areas in order to prevent or minimize the spread of invasive weeds. APM BIO-3 requires that construction vehicle movement be restricted to Project work areas. As noted in the MMRCPP, CPUC mitigation monitors will enforce implementation of these measures. The CPUC will notify SDG&E of the known infestation of Ward's weed to include in environmental training provided to Project workers in accordance with SDG&E NCCP Operational Protocol number 11.
- A6-10 In response to this comment, Table 3.16-1 has been modified to include Rancho Carrillo Trail. Text on Draft IS/MND page 3.16-4 is also modified to include a description of this trail, as follows:
- Rancho Carrillo Trail is a partially paved trail connecting Leo Carrillo Ranch Historic Park in the city of Carlsbad to the trails network (across Melrose Drive) in the city of San Marcos (City of Carlsbad, 2019).
- A6-11 The CPUC acknowledges the City of Carlsbad's General Plan policies pertaining to trail planning; however, because the policies provided in the comment direct City of Carlsbad municipal actions, and because they pertain to the siting and design of new trails, these policies do not inform the impact analysis for the Project and have not been included in the IS/MND.
- A6-12 The CPUC acknowledges that construction activity could temporarily disrupt access to the Rancho Carrillo Trail, and has included this trail in the Final IS/MND analysis as described in Response to Comment A6-10. Public notification requirements under APM PS-1 would extend to the affected trailhead. Provisions for coordination with the City of Carlsbad in advance of potential trail closures would be implemented through APM PS-2, as described in Section 3.16.
- A6-13 The City of Carlsbad will continue to receive all public notifications about the Project from CPUC. Additionally, CPUC will share Ms. Lemons' contact information with SDG&E to facilitate coordination.



Development Services

California Public Utilities Commission
Attn. San Marcos-Escondido TL6975 Project
c/o Environmental Science Associates/DDD
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

RE: TL 6975 REQUEST FOR EXTENSION OF MND PUBLIC REVIEW TO 60 DAYS

Dear Ms. Steingass:

This letter is to request an extension of the public review period for the the San Marcos to Escondido Tie Line (TL) 6975 69kV project mitigated negative declaration from 45 to **60 days**. The purpose of this request is not only to allow for thorough review of the document by City of San Marcos staff, but also to ensure that the information may be presented to elected officials in a public forum. This opportunity is critical to inform their decision making and support a robust and transparent public review process for San Marcos residents.

We appreciate the California Public Utilities Commission (CPUC) providing an initial review period of 45 days as opposed to the standard 30 days for such a project. We respectfully request your consideration of an additional 15 day extension to accommodate the City's interest in fully vetting the comments on this project with our community.

A7-1

Sincerely,

Dahvia Lynch
Development Services Director

Letter A7: City of San Marcos

- A7-1 As described in Final IS/MND Chapter 1, Introduction, the public review period for the Draft IS/MND was extended by 15 days in response to this comment.



May 29, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975 Project
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd., Ste. 200
Petaluma, California 94954

Email: TL6975SanMarcos@esassoc.com

Re: Draft Initial Study/Mitigated Negative Declaration Public Comments
San Marcos-Escondido SDG&E TL6975 Project

Dear Mr. Davis,

The City of San Marcos (San Marcos) thanks you for the opportunity to respond to the Draft Initial Study/Mitigated Negative Declaration (MND) prepared for the above referenced project. The twelve (12) mile long project crosses through the City of San Marcos and San Marcos Fire Protection District (SMFPD) with new or reconducted powerlines and associated infrastructure in various locations.

City staff reviewed the MND and are including detailed comments in Attachment A to the letter. Based upon these comments, the San Marcos City Council via Resolution 2019-8612 (Attachment B) requests that a more in-depth analysis be conducted through the preparation of an Environmental Impact Report (EIR). This is based on a lack of substantial evidence supporting the analysis and conclusions in the MND that certain project impacts can be appropriately deemed less than significant. Preparation of an EIR would provide for a more thorough analysis of these impacts, identification of sufficient mitigation measures, as well as analysis of multiple project alternatives. In consideration of community concerns, a robust project alternatives analysis will provide the public the opportunity to view a range of reasonable alternatives which could lessen project impacts.

A8-1

The City requests a formal response to the San Marcos City Council request for the preparation of the EIR and consideration of all comments contained herein be included in the draft EIR. If you have any questions, please contact Joe Farace in the Planning Division at (760) 744-1050 extension 3248 or jfarace@san-marcos.net.

Mr. Davis
San Marcos-Escondido TL6975 Project
May 29, 2019

Cordially,

A handwritten signature in dark ink, appearing to read 'Dahvia Lynch', with a stylized, flowing script.

Dahvia Lynch, AICP CEP, LEED AP
Development Services Director

Attachments (2): Comment Table
City Council Resolution 2019-8612

cc: Joyce Steingass, California Public Utilities Commission
Joe Farace, Principal Planner
Peter Kuey, Principal Civil Engineer, Land Development
Jonathan Quezada, Assistant Engineer, Land Development
Kyle Wright, Public Works, Construction Manager
Jason Nailon, Fire Marshal, SMFPD
Randy Hill, Inspector, SMFPD
Susan Vandrew Rodriguez, Associate Planner

**ATTACHMENT A - SDG&E SM TO ESC TL6975 59kV PROJECT MND COMMENTS**

CEQA Checklist Issue Area	Document Page/Section	Notes	
General Comment			
		Request for inclusion of all relevant documents as Appendices to MND. For example, but not limited to the CPUC Proponents Environmental Assessment Application including Appendices (PEA), that are referenced in the MND and used as a basis of analysis, should be included as Appendices to the MND.	A8-2
Project Description			
	Table 2-1	A letter to the City of San Marcos (City) from SDG&E dated May 4, 2016 makes references to a pole line underground project within Segment 1. The City has a General Plan Land Use and Community Design Element states that the City will continue to require that SDG&E utilities with less than 69kv proposed in new and redevelopment projects be underground (General Plan, Page 2-51). The MND does not provide the City or public with the information necessary to determine the feasibility and environmental effects of a power line underground design option for project components that are less than 69kv and are not included in the project scope. The environmental document should address the background associated with the underground project alternative and explain why this is not included in the project scope. The CPUC must consider aesthetic and community values when evaluating the terms and conditions of a permit (see D.13-07-018, requiring underground cabling in the Petition of the City of Chino Hills regarding the Tehachapi Transmission Lines (Proceeding A0706131).	A8-3
	Page 2-62	The MND references the "EMF Design Guidelines" filed with the CPUC in compliance with CPUC Decisions D.93-11-013 and D.06-01-042 in support of the conclusion that the project will be implementing electric and magnetic fields (EMF) mitigation measures in compliance with CPUC guidelines to manage EMF from power lines but does not provide any information regarding what the measures will be or what the standard or guidelines are that need to be met. The EMF Design Guidelines and the CPUC Decisions should be attached or information must be provided as to where the documents are located, and then applicant must provide an analysis for the City and the public to determine specific environmental or health consequences, if any.	A8-4
Project Construction Phasing/Staging Areas			

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Page 2-27	MND states that nighttime construction is not anticipated, so document only analyzes the possibility of limited nighttime work. City Council Resolution 2002-5865 limits construction work on San Marcos Boulevard to nighttime only when a lane closure is required, unless the City Council approves day work. The MND analysis should consider broader nighttime construction work, e.g., noise, lighting, etc. impacts, than what is currently included, and consider that nighttime work only on San Marcos Boulevard, which would likely result in a lengthened construction schedule.	A8-5
	Page 2-34	A new access road spur and right-of-way widening is proposed in open space next to Pole 36 and temporary bridges will need to be constructed to provide access across drainage areas in other project areas. Page 3.10-11 discusses use of the SDG&E BMP manual to address construction water quality, BMP's and erosion control measures. However, the BMP manual reference does not provide project specific construction or post-construction BMP's associated with areas of permanent project clearing. The City requests that construction and post-construction BMP's be provided to the City for consideration prior to project construction.	A8-6
	Section 2.5.7	The MND states that helicopters will be utilized during construction of Segments 2 and 3 (page 2-46) and that Mitigation Measure NOI-1 would reduce a significant impact to less than significant by providing written notification and a noise complaint hotline. Although communication will help to inform the community prior to impact, the analysis does not adequately explain how notification will reduce a "substantial temporary noise impact" to sensitive receptors in the project area.	A8-7
	Page 3.13-26	The analysis assumes limited nighttime work however San Marcos Boulevard construction is required to be done during the nighttime unless City Council approves daytime work. Additional noise analysis is required to address more extensive nighttime construction impacts to nearby residences along San Marcos Boulevard, especially residents near Business Park Drive. The noise measurements included in Table 3.13-2 do not include nighttime measurements to provide for a nighttime noise impact analysis of project construction along San Marcos Boulevard to sensitive land uses. The impacts associated with the nighttime work nuisance to neighbors, which is not currently addressed in the MND, shall be addressed in the MND, including a measure for advance notice to residents and other appropriate noise and nuisance measures.	A8-8
	Figure A-1	Discovery Street along the City SDG&E Substation is a two-lane roadway and the project proposes a Stringing Site in the right-of-way along the eastern street frontage 100 feet south of the one access driveway serving Valle Verde Mobile Home Park, a senior community, and the MND assumes that a traffic control plan measure will address impacts from lane closures. This generally applied measure may address impacts to major roadways or communities with multiple access points, but does not adequately address construction impacts to this senior community adjacent to a stringing site.	A8-9

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Figure A-2	Discovery Street/San Marcos Boulevard Intersection CIP 86002 is a roadway Capital Improvement Project in the final design stage and the Project Route Map includes project construction within this area and the installation of new traffic signal poles. SDG&E staff provided a conflict check for its Project design and did not note any overhead conflicts with existing facilities, which did not include CIP 86002. The SDG&E improvements should be designed to maintain proper clearance from the existing and proposed traffic improvement as shown on the City project plans for CIP 86002.	A8-10
	Figure A-6	Project Route Map calls for a new permanent access road off of San Marcos Boulevard, which would require a right-of-way permit, easements and proposed driveway. Additional details are required in order for the City to sufficiently provide comments on this proposed new access road.	A8-11
	Figure A-6	A new signal for the City of Vista Skyline project adjacent to City of San Marcos right-of-way approved via City Improvement Plan 17-0002 will be installed within the next few months in the Project area. The new pole proposed as part of the Project should be designed to maintain proper clearances from traffic improvements.	A8-12
	Figure A-6	Several proposed pole locations across segment 1 and segment 2 lands are on private property. Construction drawings need to be provided including pole locations showing established easements along with proposed construction access. Please reference grading plans GP-2413 generated for transmission lines from Shadowridge to Meadowlark Junction for the City of San Marcos' expectation on level of detail required for each pole location. Additional details are required in order for the City to provide additional comments.	A8-13
	Figure A-6	The Project Route Map calls for a new permanent access road off of San Marcos Boulevard, which will require a right-of-way permit, easements, and proposed driveway details none of which have been included in the MND. For example, the location of proposed permanent driveway and access road to serve Pole 36 may potentially conflict with an approved subdivision map (TSM number 15571, Meadowlark Canyon). The site is subdivided but not yet graded for the construction of 33 lots. The City requests a conflict check with the Meadowlark Canyon project to ensure that any conflicts with the mapped project are addressed.	A8-14
	Figure A-11	Along segment 2 of Project Route Map Stringing Activities are shown close to existing homes on Coast Avenue. Pages 3.17-15 – Page 3.17-16 discuss how encroachment permits from the City will include traffic control plans that will address impacts associated with road closures in work areas. However, residences directly next to construction may experience other nuisance impacts, such as to driveway and pedestrian access. Please provide conceptual construction drawings which further illustrate the proposed work to allow the City further review of potential construction impacts created by the proposed project.	A8-15

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Figures A-20 and A-21	The Project Route Map shows a proposed Staging Area at the intersection of San Elijo Road and the Old Dump Road, and the Old Dump site. The MND does not provide verification as to whether the property owner has granted access, and has not provided sufficient impact analysis information, such as visual simulations or traffic analysis, to evaluate potential visual, traffic, and line of sight impacts to San Elijo Road that may result from construction equipment use and storage.	A8-16
	Figure A-3	The MND does not provide sufficient information for transportation plan implementation during construction for the Stringing Activities and temporary grading Impacts that will occur along San Marcos Boulevard in front of San Marcos High School and along Discovery Street in front of the SM SDG&E Substation and adjacent to the Valle Vista MBH Park community served by one access driveway.	A8-17
	N/A	<p>In addition, public landscape parkway impacts need to be addressed for all City areas impacted within the public right-of-way. With issuance of an Encroachment Permit, as included in the project description, the following project specific areas are identified that would be required to ensure no impact to public landscape, and its functional and aesthetic purposes:</p> <p>Segment 1; Existing public right-of-way landscape and irrigation on San Marcos Boulevard to Discovery Street to be protected and or restored in kind.</p> <p>Segment 2; Existing public right-of-way landscape and irrigation on Rancho Santa Fe Rd & San Elijo Road to be protected and or restored in kind.</p>	A8-18
Aesthetics			
	Overall	Please include the key observation point location map included in the PEA application that is not in the MND. The MND does not provide sufficient information for the City or the public to determine the aesthetic, visual and other use impacts created by the project (see, <i>T-Mobile West LLC v. City and County of San Francisco</i> (2019) 6 Cal. 5 th 1107-upholding authority of city to condition permit approval for telephone line construction on aesthetic considerations).	A8-19
	Page 2-27	Please see comment under Project Construction relative to night construction lighting impact assessment that should be included.	A8-20
	Figure 3.1-13	Please correct Acacia "Street" to "Drive". In addition, a visual simulation from S. Rancho Santa Fe Road at Via Cancion, located at a lower elevation to the poles, should be provided to demonstrate the potential visual, aesthetic and other use impacts of the new poles within the visual corridor. Also, visual simulations from Simmons Family Park, looking south from Palomar Airport Road where TL138 25 and TL138 11 cross Palomar Airport Road, and a simulation as you go over the crest of Coast Avenue in the middle of Rancho Dorado should be provided to	A8-21

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

		fully assess the visual change to the area.	↑ A8-21 (Cont.)
	Figure 3.1-15 Brookside Court- Looking Northwest & Page 3.1-24	Analysis states that pole transmission facilities would become a more dominant feature within the visual setting but determines the impact to be less than significant. This analysis does not address the City policy to underground utilities which would minimize the aesthetic impact. Any above ground facility may elevate from a moderate to high aesthetic impact, which is significant. To mitigate such an impact, at a minimum, visual screening would be necessary to reduce the impact level. No visual screening measures are proposed, therefore, the impact will remain significant. In addition, a visual simulation from San Elijo Road for this area, located at a lower elevation to the poles, should be provided to demonstrate the potential visual, aesthetic and other use impacts of the new poles within the open space corridor.	A8-22
	Overall	Based upon the comments provided, the Aesthetics section assumes a no or less than significant impact for all impacted areas which is not supported by substantial evidence. More information is required to determine if the project will result in a significant impact and to consider additional mitigation measures, including but not limited to intervening screening measures.	A8-23
Agricultural Resources			
	Figure 3.2-1	The farmland figure in the MND is not consistent with the City General Plan Figure 4-4, Agricultural Areas. The MND needs to be updated to reflect the City of San Marcos General Plan, and the agricultural analysis findings shall be based upon a corrected Figure 3.2-1.	A8-24
Air Quality			
	See Note	Please refer to impacts relative to Park and Trails provided under Recreation section.	A8-25
Biological Resources			
	Section 3.4.1	Environmental Setting states that all construction will occur within existing rights-of-ways franchise positions (Cities/County roadways), and SDG&E fee owned property. The Project Route Map sheets in Appendix A (such as A-5) appear to include area outside of the existing SDG&E easement. To assist the City further in MND review, please provide the CAD overlay files to allow the City to verify the overlap of the project route maps to City right-of-ways and any other existing drainage, or open space easements.	A8-26

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Page ES-9, Impact 3.4.e.	MND APM BIO-1 requires that NCCP compliance protocols be used to minimize impacts on biological resources but then goes on to say that there is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP. In the absence of the NCCP take credits, compliance with the federal and State Endangered Species Act would be required, resulting in a less than significant impact. Should the mitigation not comply with SANDAG's MHCP via the City of San Marcos Draft Subarea Plan, impacts to biological resources within the City may be significant, and the mitigation measure does not provide an enforceable alternative.	A8-27
	Page 3.4-28, Tree Protection Policy	Impact 3.4.e. states no conflict with the City of San Marcos tree preservation policy but does not include City of San Marcos 1:1 tree replacement policy (page 3.4-28). The MND does not address this replacement requirement for trees that will be removed as the result of the project. In addition, City of San Marcos Operations division has verified that current SDG&E tree topping procedures that are anticipated to extend into future pole maintenance areas will impact existing tree views intended to provide for visual and aesthetic appeal, community landscape, native open space, and to enhance project design. The City of San Marcos Tree Protection Ordinance Section 14.20.010 prohibits trimming, damaging, or removing trees from any public property or public right-of-way unless a permit is obtained. The MND does not discuss the Tree Protection Policy so cannot support a "no impact" determination to the City of San Marcos local tree protection policy.	A8-28
	Page A-6	The proposed additional right-of-way and new access road appear to be located through a mapped subdivision (Meadowlark Canyon 33-lot Subdivision Map 1557). The MND analysis must address if and how the project impact to the development footprint is significant.	A8-29
Cultural Resources			
	Overall	The CPUC PEA Cultural Resource non-confidential documents used as a basis of analysis should be provided as an Appendix to the MND.	A8-30
Geology, Soils, Seismicity, and Paleontological Resources			
	Segment 1	The quantity of soil being disturbed during the excavation of poles and the grading of access roads needs to be quantified. This in turn may trigger the need for a grading permit to be applied for and issued through the City of San Marcos. Please provide more detailed grading cut/fill disturbance quantification in order for the City of San Marcos to determine if a grading permit is required and what, if any impacts, may be associated with said grading.	A8-31
Hazards & Hazardous Materials – Please see San Marcos Fire Department comments under the Wildfire section.			
Land Use Compatibility			
	Franchise	The project involves SDG&E right-of-way expansion (Poles 8, 11-14, 15-16, 18-20) along San Marcos Boulevard that	A8-32

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Agreement	would need to be addressed in any franchise agreement with the City of San Marcos.	A8-32 (Cont.)
	Staging Sites	Staging Sites: Please verify that property owners have been notified of the potential use of their property for staging, so that there is more certainty regarding the project site and potential impacts. Specifically, the MND should identify what properties will be affected and assess and evaluate any impacts including, but not limited to, economic, environmental, visual and aesthetic impacts, and to appropriately address the same. Any property right which is not currently owned by SDG&E would have to be acquired by SDG&E. The City of San Marcos and public do not have enough information to determine what sites will be affected and the City of San Marcos does not have enough information to determine what land use approval may be required, for example for the use of the Loma San Marcos site as a temporary construction Staging Site.	A8-33
	Figure A-2 Page 3.11-1	Approximately 1.2 acres of additional right-of-way would be required to accommodate the re-build along Segment 1 SDG&E shall contact City of San Marcos Real Property Services Division for any project impacts to City owned property. Specifically, the MND should assess and evaluate any impacts to real property owned by the City, including, but not limited to, economic, environmental, visual and aesthetic impacts, and to appropriately address the same. Any property right which is not currently owned by SDG&E would have to be acquired by SDG&E. The City Public Works Department shall also be notified of any project impacts to City Park property. All appropriate City Departments shall be provided with all construction plans for review and input prior to commencement of project construction.	A8-34
	Page 3.11-1	For additional right-of-way within a land use designation other than public-institutional, a land use change approval may be required through the City Development Services, which may result in additional site specific environmental analysis. Construction drawings are required for the City of San Marcos to determine if any of the project area will require a land use change (see, G.O. 131-D.) Specifically, the MND should assess and evaluate any impacts to City right-of-way, including, but not limited to, economic, environmental, visual and aesthetic impacts, and to appropriately address the same. Any property right which is not currently owned by SDG&E would have to be acquired by SDG&E.	A8-35
	Figure A-2	Additional right-of-way along San Marcos Boulevard appears to impact existing trees within the road right-of-way. Landscape and other utility/irrigation box conflicts within the City of San Marcos right-of-way needs to be addressed. Specifically, the MND should assess and evaluate any impacts to City of San Marcos right-of-way, including, but not limited to, economic, environmental, visual and aesthetic impacts, and to appropriately address the same. Any property right which is not currently owned by SDG&E would have to be acquired by SDG&E.	A8-36

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Noise			
	Overall	The CPUC PEA Application Noise Appendix should be included as an Appendix to the MND.	A8-37
	Page 2-27	Please see comment under Project Construction relative to night construction lighting impact assessment that should be included.	A8-38
	Table 3.13-2	The analysis assumes limited nighttime work however San Marcos Boulevard construction is required to be done during the nighttime unless City Council approves daytime work. Additional noise analysis is required to address more extensive nighttime construction impacts to nearby residences along San Marcos Boulevard, especially residents near Business Park Drive. The noise measurements included in Table 3.13-2 do not include nighttime measurements to provide for a nighttime noise impact analysis of project construction along San Marcos Boulevard to sensitive land uses.	A8-39
	Table 3.13-4, Page 3.13-11 and Page 3.13-14	These tables purport to be references to City of San Marcos General Plan Noise Element Land Use Compatibility, transportation related noise, and non-transportation related construction noise including construction, maintenance, and nuisance noise. However Table 3.13-4 references County of San Diego Noise Compatibility Guidelines not the City of San Marcos.	A8-40
	MM NOI-1	This mitigation measure requires daytime noise reduction only and states that SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). This measure should specify applicable night noise impacts to sensitive receptors along San Marcos Boulevard or recommend other applicable measures for night construction impacts. As a local agency issuing ministerial construction permits (encroachment, grading, etc.), and as this information should be provided to the public during the environmental review process, the City of San Marcos requests a copy of the Plan.	A8-41
	MM NOI-1	Please see comment regarding helicopter use during construction comment under Project Construction section.	A8-42
	MM-NOI-3	This measure requires a Vibration Reduction Plan (VRP) submittal to CPUC. As a local agency issuing ministerial construction permits (encroachment, grading, etc.) and as this information should be provided to the public during the environmental review process, the City of San Marcos requests a copy of the VRP.	A8-43
Recreation			
	Page 3.16-8, MM NOI-1 and MM NOI-2	The Mitigation Measures states that the Construction Noise Reduction and Blasting Plan (Plan) will mitigate the impacts to recreation to less than significant. The analysis does not provide sufficient evidence to support the finding that the Plan will adequately address the overall impact of the construction to trail users and Simmons Family Park. The MND bases its conclusion on the short-term closure time of three weeks and the provision of public notice. The MND states that park and trailer users will use other facilities in the City of San Marcos, but the	A8-44

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		analysis does not address how this redistribution will result in impacts in the way of traffic trips or air quality impact resulting from residents having to travel outside of their immediate area to access City of San Marcos parks or trails that aren't otherwise available though pedestrian travel. SDG&E will need to obtain approval of a park and trail closure schedule with City Public Works Department prior to project construction to ensure that the City of San Marcos can manage the temporary impacts to City events and activities that occur throughout the City Park System. Failure to do so would result in a significant impact to City parks and trails.	A8-44 (Cont.)
	Figure A-11	Stringing Sites are proposed adjacent to the Simmons Family Park at Coast Avenue in San Marcos. SDG&E will need to obtain approval of a park and trail closure schedule with City Public Works Department prior to project construction to ensure that the City can manage the temporary impacts to City events and activities that occur throughout the City Park System. Failure to do so would result in a significant impact to City parks and trails.	A8-45
Transportation and Traffic			
	Page 3.17-10	States that City of San Marcos does not require detailed LOS analysis for temporary construction traffic but does not include City Council Resolution 2002-5865 that no day work is permitted on San Marcos Boulevard unless approved by City of San Marcos City Council. The MND lacks sufficient consideration of nighttime work along San Marcos Boulevard.	A8-46
	Page 3.17-12	Top of page states that traffic-generating construction activities would consist of daily arrival and departure of workers to each work site but does not state this could occur at night.	A8-47
	Overall	Traffic and access impacts from lane closures to San Marcos Boulevard that could significantly impact traffic circulation east and west of San Marcos High School are not sufficiently addressed.	A8-48
Wildfire			
	Overall	The MND concludes that the project as proposed will reduce wildfire risk. In the absence of any analysis on alternatives, including undergrounding, the city and public cannot determine if feasible alternatives that might be safer. For example, after careful review, PG&E decided to build its electric distribution system underground to protect against wildfires in Paradise, after it was devastated by the Camp Fire (see, https://www.sacbee.com/news/state/california/article230732884.html .) The City and public should be provided with the information and relevant factors as part of the environmental review process.	A8-49
	Overall	Provide the San Marcos Fire Department a copy of the Final Project-specific Construction Fire Prevention Plan (FP Plan) for final review as part of the environmental process. The Fire Plan included in the CPUC PEA application should be included as an Appendix to the MND, and should be in its final form, not a draft.	A8-50
	FP Plan	The MND fails to indicate the San Marcos Fire Department under "Fire Jurisdiction & Land Ownership".	A8-51

ATTACHMENT A: SDG&E SM TO ESC 69kV PROJECT MND COMMENTS

	Page 7, Table 1		
	FP Plan	SDG&E should also consult with and obtain appropriate approvals from, the California Department of Forestry and Fire Protection (Cal Fire) due to the management role they may assume during a major wildfire fire event. Please add language to the plan to include Cal Fire as an approving agency.	A8-52
	Overall	Provide the San Marcos Fire Department construction level drawings of the existing dirt and new permanent spur roads.	A8-53
	Overall	Based on the response back to comments, additional San Marcos Fire Protection District comments will be provided.	A8-54
Mandatory Findings of Significance (Level of Review – MND)			
	Overall	No alternative analysis in MND. MND Analysis lacks Substantial Evidence, especially in analysis areas of Aesthetics and Construction Impacts, to conclude that all impacts are less than significant with adequate mitigation. An EIR would provide an avenue to include project alternatives that were discussed in the CPUC PEA application and overrides to address potentially significant impacts.	A8-55
	Overall	The City of San Marcos questions the level of substantial evidence provided to make a determination of a less than significant impact in areas such as Aesthetics, Grading, and Construction (noise, lighting, access, air quality, etc.). The mitigation measures in these areas are not sufficient, and as such, the analysis rises to a level of EIR, and should include project alternatives, including but not limited to those discussed in the CPUC PEA application, in order to provide the public a robust range of reasonable alternatives which could lessen project impacts.	A8-56

RESOLUTION NO. 2019-8612

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SAN MARCOS, CALIFORNIA, AUTHORIZING THE CITY MANAGER TO SEND A LETTER TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC) REQUESTING THAT THE CPUC PREPARE AN ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED SAN DIEGO GAS AND ELECTRIC SAN MARCOS TO ESCONDIDO TIE LINE (TL) 6975 PROJECT

WHEREAS, the City of San Marcos does not have the authority to regulate or make decisions related to public utilities and associated infrastructure such as powerlines; and

WHEREAS, the California Public Utilities Commission (CPUC) is the designated regulatory authority over public utilities in California, including San Diego Gas and Electric (SDG&E); and

WHEREAS, SDG&E is proposing a new approximately twelve-mile powerline project known as Tie Line (TL) 6975 that crosses through the City of San Marcos and would result in the construction of new, large steel poles, replacement of conductors and other electricity transmission infrastructure in various locations throughout the community; and

WHEREAS, the CPUC has issued a mitigated negative declaration for public review through May 30, 2019 that provides an analysis of the potential impacts of the TL 6975 project; and

WHEREAS, staff has reviewed said mitigated negative declaration and has determined that the analysis therein lacks substantial evidence to conclude that certain impacts are less than significant; and

WHEREAS, based on that evaluation, staff recommends that the CPUC prepare an environmental impact report (EIR) to further analyze potential project impacts, identify appropriate mitigation measures and analyze project alternatives that may lessen environmental impacts.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SAN MARCOS, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. The foregoing recitals are true and correct and are hereby incorporated into this Resolution by reference.


Section 2. The City Council hereby authorizes the City Manager to issue a letter to the CPUC providing comments on the existing mitigated negative declaration for the SDG&E TL 6975 project and requesting that an EIR be prepared for the project.

PASSED, APPROVED AND ADOPTED at a regular meeting of the City Council of the City of San Marcos, California, held on this 14th day of May, 2019, by the following roll call vote:


AYES: COUNCILMEMBERS: JENKINS, PETREK, WALTON, JONES

NOES: COUNCILMEMBERS: NONE

ABSENT: COUNCILMEMBERS: NUÑEZ


Rebecca D. Jones, Mayor
City of San Marcos

ATTEST:


Phillip Scollick, City Clerk
City of San Marcos

Letter A8: City of San Marcos

A8-1 The CPUC acknowledges receipt of San Marcos City Council Resolution 2019-8612 (Attachment B to the City’s May 29, 2019 letter) and understands that the City requests an EIR be prepared for the Project. For a general discussion of the reasons that CPUC has prepared a Final IS/MND rather than a Draft EIR, and that Project alternatives are therefore not considered, please see Master Response 4, CEQA Process. For specific responses to the City’s comments regarding the substantial evidence supporting the Draft IS/MND analysis and conclusions, please see responses A8-2 through A8-56 for the detailed response.

A8-2 The CPUC acknowledges the City’s request that the Proponent’s Environmental Assessment (PEA), including PEA Appendices referenced in the Draft IS/MND, be included as appendices to the CPUC’s document. SDG&E submitted the PEA to CPUC in November 2017 per the requirements of CPUC General Order 131-D, Sections IX.B.1.a-f. In March 2018, the CPUC deemed SDG&E’s application complete and created a website for the Project, where the PEA and all its appendices were made available for download at that time. These documents continue to be available for download and are therefore easily accessible to those wishing to review them. The website address is:

<https://www.cpuc.ca.gov/environment/info/esa/TL6975/index.html>

The PEA and Appendices are not required to be appendices to the IS/MND, and the request to include them as appendices to the IS/MND is not a comment on the adequacy or accuracy of the CEQA analysis. It is not clear what other documents the City is requesting be included as appendices to the IS/MND.

A8-3 The CPUC acknowledges the statement in the City of San Marcos General Plan Land Use and Community Design Element that “The City will continue to require undergrounding of utilities (with a line less than 69 kilovolts) as new development and redevelopment occur throughout the planning area.”³ This City requirement is not specified in a General Plan policy in this element. The City’s municipal code Chapter 14.24, Underground Utility Facilities, addresses undergrounding requirements, but includes the following exception: “This chapter and any resolution adopted pursuant to this chapter shall not, unless otherwise provided in such resolution, apply to the following types of facilities: ... Poles, overhead wires and associated overhead structures used for the transmission of electric energy at nominal voltages in excess of 34,500 volts” (§14.24.040(b)(4)).⁴ Neither the General Plan statement nor the municipal code requirements would be applicable to the Project’s 69 kV conductors or the poles that would carry the conductors. Additionally, as explained in Draft IS/MND Section 3.11.2, the CPUC has sole and exclusive jurisdiction over the siting and design of the Project’s 69 kV power lines

³ City of San Marcos, 2013. San Marcos General Plan, Land Use and Community Design Element. Page 2-51.

⁴ 34,500 volts is equivalent to 34.5 kV.

pursuant to CPUC General Order 131-D; therefore, the power lines are exempt from local land use and zoning regulations.

Draft IS/MND Chapter 2, Project Description, describes three instances of Project work on distribution lines that are less than 69 kV:

- 1) In Segment 1, the existing overhead 12 kV distribution line that utilizes the existing TL 680C poles would be reconducted (existing conductor replaced with new conductor) and placed on the replacement poles. This distribution line currently is and would remain an “underbuild” located on poles carrying 69 kV circuits.
- 2) In Segment 1, the existing underground distribution line adjacent to the Project would be reconducted.
- 3) At Meadowlark Junction on Segment 3, the existing 12 kV distribution line would be reconfigured (existing conductor removed from current pole location and placed on other existing and proposed poles).

Each of these components is an existing distribution line. The existing underground distribution line in Segment 1 already is underground; therefore, no additional “underground design option” would be relevant. The aboveground 12 kV lines in Segment 1 and at Meadowlark Junction would not be new lines, and where Project-related work would occur, they would be strung as underbuild on poles carrying 69 kV lines. Therefore, these lines would not be subject to the City of San Marcos’ requirements. Regardless, because these are existing lines, they would not cause a significant impact attributable to the Project that would result in the CPUC analyzing alternatives to these components in this CEQA process. Please see Master Response 4 for a detailed discussion of the CEQA requirement to consider alternatives in an EIR only. The “underground project alternative” mentioned in the City’s comment letter is addressed in the Master Response; it is not a CPUC CEQA alternative.

Regarding the final sentence of this comment, the physical aesthetic impacts of the Project are analyzed in Section 3.1 of the Draft IS/MND and further clarified in Master Response 1, Aesthetics. As explained in Master Response 5, Non-CEQA Issues, although “community values” and community character are not issues of CEQA concern, the CPUC will consider these concepts brought forward by parties to its formal proceeding – of which this CEQA evaluation is a part – and ultimately in its decision to approve or disapprove the Project.

- A8-4 Please see Master Response 3, EMF and Corona Noise, for a discussion of the CPUC’s approach to evaluating and minimizing extremely low-frequency EMF. SDG&E’s Magnetic Field Management Plan is provided as Appendix C of this Final IS/MND. This plan was included in SDG&E’s Proponent’s Environmental Assessment, which was provided to the public on the CPUC’s Project website and cited in the Draft IS/MND. For the reasons described in Master Response 3, no additional analysis is required for the CEQA process.

A8-5 This response addresses Comments A8-5, A8-8, A8-20, A8-38, A8-39, A8-41, and A8-46 through A8-48. The CPUC acknowledges the City of San Marcos' City Council Resolution 2002-5865 limiting construction work that involves a lane closure on San Marcos Boulevard to nighttime hours and understands that SDG&E would comply with local encroachment permit requirements (see PEA, p 3-30). The Draft IS/MND analyzes the potential impacts of nighttime construction. As stated in APM TRA-1, "If construction requires lane closures, traffic delays, or other encroachment of construction activities within public travelways, the Applicant will adhere to local traffic control regulations and establish a traffic control plan as needed to comply with local ordinances." Consistent with this commitment, Draft IS/MND Chapter 2 states on page 2-27, "Although nighttime construction is not anticipated, it may be required as a result of a condition of an agency permit or local traffic control direction from one of the study area jurisdictions." For clarification purposes, the Final IS/MND is revised so that this statement reads, "Although nighttime construction is not ~~anticipated~~ proposed except where required by local ordinances, it may be required as a result of a condition of an agency permit or local traffic control direction from one of the study area jurisdictions." As described below, some nighttime construction is anticipated and was analyzed in the Draft IS/MND.

The Draft IS/MND describes three Project components that may require lane closures along West San Marcos Boulevard: temporary work areas for pole installation and removal (see page 2-38), trenching activities for reconductoring the existing underground 12 kV line adjacent (see page 2-48), and installation of AC interference mitigation system deep wells (see page 3.17-13). Although the relevant technical sections of the Draft IS/MND analyzed the potential for lane closures for the deep wells, Section 2.5.9 in the Final IS/MND is revised as follows to clarify that lane closures may be needed for this Project component in the Project Description:

The wells would be located in public ROW in the cities of San Marcos and Carlsbad (i.e., West San Marcos Boulevard, Palomar Airport Road). Each well would be 100 feet deep and 6 inches in diameter, though the upper 30 feet would be 8 inches in diameter to allow for a PVC casing. Each well would contain a copper grounding rod connected to a copper wire, in turn connecting the well to a SSD, and backfilled with conductive concrete. The wire would be laid in trenches up to 5 feet in depth to match pipeline depth. The trenches would be excavated using backhoes. Once the wire is connected to the pipe and SSD mechanisms, the trench would be backfilled and ground cover returned to its original condition. Deep well installation could require lane closures on West San Marcos Boulevard.

Lighting

The Draft IS/MND acknowledged the potential for and analyzed the impacts of nighttime construction lighting. The text on page 3.1-28 has been revised as follows to clarify that the nighttime construction considered includes work requiring lane closures on San Marcos Boulevard:

Nighttime construction may be required as a result of a condition of an agency permit (e.g., Caltrans encroachment permit) or local traffic control direction from one of the study area jurisdictions (e.g., as required by City of San Marcos Resolution No. 2002-5865). As a result, construction lighting could adversely impact nighttime views in the vicinity of the construction sites.

Noise

The Draft IS/MND adequately analyzed noise impacts of nighttime construction. As explained on page 3.13-19, several jurisdictions in the Project area have adopted construction noise standards, and among these, the most protective standard (75 dBA) is applied throughout the Project area. The City of San Marcos' Noise Ordinance does not include a numeric noise standard specific to construction; however, the CPUC exercised its discretion to use a protective threshold based on other jurisdictions' codes. As described on page 3.13-20, sensitive receptors close to Project construction sites would experience noise levels above the 1-hour 75 dBA Leq threshold due to construction. The significance conclusion for construction noise on page 3.13-20 addresses nighttime construction noise:

Since sensitive receptors were identified within 20 feet of on-site construction areas *and there is potential for construction activities outside of daytime hours (i.e., nighttime, weekend, holiday)*, construction noise could constitute a substantial temporary increase in ambient noise levels in the Project vicinity. (emphasis added)

Because a significant impact would occur, even after implementation of SDG&E's APMs NOI-1 and NOI-2, Mitigation Measure NOI-1 would be required to reduce this impact to less than significant. This mitigation measure would apply to all construction activities within 100 feet of sensitive receptors, including nighttime construction, and requires noise reduction, notification to affected residences and correction of noise exceedances, and if needed, temporary relocation of residents if construction noise cannot be reduced to 75 dBA Leq or below for affected residences. This mitigation measure would reduce nighttime construction noise impacts on sensitive receptors, including those along West San Marcos Boulevard, to a less-than-significant level by either reducing noise to below the significance threshold or temporarily relocating residents away from noise exceedances.

It is noted that Draft IS/MND Table 3.13-8 (renumbered 3.13-8a in the Final IS/MND) presents the City of San Marcos' Exterior Noise Standards by Zone, from Municipal Code Chapter 20.300.70(E)(2) Table 20.300-4. This table provides 1-hour average sound level limits for the nighttime hours of 10:00 p.m. to 7:00 a.m. for single-family residential and multi-family residential. However, as stated in Municipal Code Section 20.100.040(D), these noise limits "shall not be construed to limit or interfere with the installation, maintenance, or operation of...electric, telephone, or telegraph transmission lines when installed, maintained, and operated in accordance with all other applicable laws." Therefore, these limits are assumed not to apply to power line construction.

Transportation

The following paragraph is added to the City of San Marcos subsection on Draft IS/MND page 3.17-10 to clarify that the anticipated adherence to local traffic control regulations and ordinances work described in APM TRA-1 (page 3.17-11) includes City of San Marcos' requirements for nighttime off-peak or weekend work if lane closures would occur in San Marcos Boulevard:

San Marcos City Council Resolution 2002-5865 directs the City Manager to require that routine maintenance, repair, and/or installation work in the San Marcos Boulevard public right-of-way, from Knoll Road to the westerly city limits, that necessitates a lane closure in either direction, must occur during nighttime off-peak hours (i.e., 7:00 pm to 6:00 a.m.) or on weekends (City of San Marcos, 2002).

The transportation impact analysis evaluated the potential worst case scenarios as discussed on Draft IS/MND page 3.17-12: "potential effects on roadway LOS were analyzed assuming that all Project-related trips could occur on a single roadway where that roadway could represent a common travel route for multiple project elements (such as SR 78 and I-15). This analysis is considered to be conservative as, in reality, construction trips would be dispersed along roadways adjacent to the 12-mile-long alignment." Furthermore, as described on page 3.17-13, "On the study area local roadways that currently operate at LOS A, B, or C, the addition of construction-related trips would not result in any degrading of LOS to an unacceptable level. As noted previously, this analysis conservatively assumes that all construction traffic would travel on these facilities, which is highly unlikely on local roadways considering that construction traffic would be dispersed across the 12-mile-long Project alignment. Therefore, the addition of construction-related trips would result in a less-than-significant impact on the performance of study roadway segments." As shown in Table 3.17-1 on page 3.17-3, all of the intersections of San Marcos Boulevard in the study area operate at LOS A, B, or C. Therefore, the worst-case scenario would not have a significant impact on roadway performance, and shifting Project traffic and lane closures to off-peak hours would further reduce impacts.

- A8-6 The SDG&E Water Quality Construction BMP Manual does address BMPs associated with areas of permanent clearings, such as unpaved access roads. Please see page 3 of the manual, under the heading "Step 1 – Identify 'Permanent' or 'Structural' BMPs required by Local Municipalities and/or the SWRCB General Construction Storm Water Permit;" page 5, regarding selection and sequencing of Surface Stabilization BMPs; and pages 88 through 103, which provide detail about specific BMPs 04-01 through 04-08, at this URL:

https://www.sdge.com/sites/default/files/TL674A-TL666D%2520Attach%2520_08-B%2520SDG%2526E%2520BMP%2520Manual.pdf.

The CPUC has not identified a need for Project-specific BMPs that differ from those described in this manual. SDG&E's BMP manual is specific to the types of facilities it

- constructs and maintains, including access roads, and supports the conclusion on Draft IS/MND page 3.10-11 that Project construction would not adversely affect water quality as a result of erosion.
- A8-7 In addition to noise reduction measures, community notification, and a noise complaint hotline and correction requirement, Mitigation Measure NOI-1 requires that SDG&E provide for temporary relocation of residents if construction noise could not be reduced below the significance threshold. Temporarily relocating sensitive receptors from the area so that they do not have to experience the construction noise would avoid the impact on those receptors.
- A8-8 Please see Response to Comment A8-5. Mitigation Measure NOI-1 would apply to all construction activities within 100 feet of sensitive receptors, including nighttime construction.
- A8-9 The CPUC acknowledges the presence and location of the Valle Verde Mobile Home Park, a senior community (55+). As shown on Draft IS/MND Appendix A, Figure A-1, the proposed stringing site would be located on the northeast side of Discovery Street, southeast of the Valle Verde Mobile Home Park entry and exit gate also on the northeast side of the street. The stringing site would not block the driveway, and would be located over 160 feet from the Valle Verde driveway. No conflict between the stringing site and the Valle Verde community is apparent from the comment. The comment does not provide any evidence or explanation of potential construction impacts on the Valle Verde Mobile Home Park or any specific alleged inadequacy of APM TRA-1 in this location. No further response is required.
- A8-10 The City of San Marcos' CIP 86002 is acknowledged. This project was included as project 1-5 in Table 3.21-1 of Section 3.21, Mandatory Findings, in the Draft IS/MND and has, therefore, been considered in the Project's analysis of cumulative impacts. If the Project is approved, final design would be completed with consideration for existing and foreseeable physical conflicts. The design of the Project to avoid physical conflicts with other planned infrastructure is outside the scope of CPUC's CEQA review.
- A8-11 The comment does not provide enough specificity with regard to the additional details being requested to allow CPUC to provide a detailed response. The Draft IS/MND provided all Project details available to CPUC at this time that are relevant to the CEQA process.
- A8-12 The City of Vista Skyline project is acknowledged. Although not identified specifically in the City of Vista's City Planning/Development Projects Interactive Site, it is included there as part of the Vista Palomar project. The Vista Palomar project was included as project 1-3 in Table 3.21-1 of Section 3.21, Mandatory Findings, in the Draft IS/MND and has, therefore, been considered in the Project's analysis of cumulative impacts. If the Project is approved, final design would be completed with consideration for existing and foreseeable physical conflicts. The design of the Project to avoid physical conflicts with other planned infrastructure is outside the scope of CPUC's CEQA review.

- A8-13 If the Project is approved, final construction drawings would be completed and require local ministerial permits be obtained prior to construction. All existing and proposed SDG&E ROW, as well as existing and proposed access roads, are shown in Draft IS/MND Appendix A as needed to support CPUC's CEQA analysis. No construction drawings of the type requested in the comment are available to CPUC at this time to share with the City of San Marcos. Additionally, the City's issuance of ministerial grading permits is outside the scope of CPUC's CEQA review.
- A8-14 If the Project is approved, final construction drawings would be completed and required local ministerial permits obtained prior to construction. All existing and proposed SDG&E ROW, as well as existing and proposed access roads, are shown in Draft IS/MND Appendix A as needed to support CPUC's CEQA analysis. No details of the type requested in the comment are available to CPUC at this time to share with the City of San Marcos. Additionally, the City's issuance of ministerial permits is outside the scope of CPUC's CEQA review.
- A8-15 As shown on Figure A-11 in the Draft IS/MND, the proposed stringing sites near Coast Avenue would be located within existing SDG&E ROW on existing access roads. APM TRA-1 applies to all public travelways, including Coast Avenue, and would ensure driver and pedestrian safety. No construction drawings of the type requested in the comment are available to CPUC at this time to share with the City of San Marcos.
- A8-16 As described on Draft IS/MND page 2-35, "SDG&E generally does not hold ownership or easement over these candidate sites; therefore, some may not be available when pre-construction activities...would occur." Thus, it is acknowledged that some of the proposed staging sites may not be used during Project construction. As shown on Figure A-21 in the Draft IS/MND, the proposed staging site is within and south of an existing building. From the perspective of San Elijo Road, north of the building, neither the building nor the area behind it is visible. Potential traffic safety conflicts would be addressed through implementation of APM TRA-1.
- A8-17 Please see Responses to Comments A8-5 and A8-9.
- A8-18 The City's issuance of ministerial encroachment permits is outside the scope of CPUC's CEQA review. No disturbance within City right-of-way, nor disturbance to City landscaping and irrigation, are anticipated on Rancho Santa Fe Road or San Elijo Road. Tree removal is not proposed. Nonetheless, as described in detail on Draft IS/MND page 2-53, all areas temporarily disturbed by Project activities would be restored to pre-construction conditions, consistent with firebreak requirements.
- A8-19 SDG&E's 2017 PEA did not include a key observation point (KOP) map or visual simulations, as stated in CPUC's Deficiency Letter 1. SDG&E's response to this deficiency letter included Attachment 3C, which provided a map similar to Draft IS/MND Figure 3.1-1 as well as a mapbook and visual simulations. This response was

made available on the CPUC's Project website in January 2018 and can be found at the following URL:

[https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/Attachment3C_SANM_ARCOSESCONDIDOVISUALSIMS_\[TL6975DeficiencyLetter_1_011218\].pdf](https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/Attachment3C_SANM_ARCOSESCONDIDOVISUALSIMS_[TL6975DeficiencyLetter_1_011218].pdf).

The map of KOPs provided in Draft IS/MND Figure 3.1-1 provides the locations and orientations of photos used to depict existing conditions and visual simulations. This map, combined with text descriptions of the KOPs and the photographs provided from the KOPs provides adequate information about the locations and orientations of these observation points to support the CPUC's CEQA analysis. Inclusion of SDG&E's maps in the IS/MND is not necessary.

The comment does not provide enough specificity with regard to what the City considers "insufficient information" to allow CPUC to provide further detailed response. Please note that the case cited in the comment, *T-Mobile West, LLC v. City and County of San Francisco* (6 Cal.5th 1107 (2019)), concerned a San Francisco ordinance requiring wireless telephone providers to obtain a permit to construct a wireless pole (cell tower) in the public right of way. The Court found that the ordinance was lawfully enacted and was not preempted by California Public Utilities Code Section 7901, which pertains to telegraph or telephone corporations and the construction of telegraph or telephone lines. Section 7901 of the Public Utilities Code does not apply to electric utilities or power lines, and the cited case has no bearing on the regulation of electric utilities or power lines. CPUC General Order 131-D clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects that are subject to CPUC jurisdiction, including the proposed Project.

A8-20 Please see subheading "Lighting" under Response to Comment A8-5.

A8-21 The CPUC acknowledges the typographical error in Draft IS/MND Figure 3.1-13 (Final IS/MND Figure 3.1-19) and elsewhere in Draft IS/MND Section 3.1. Four references to "Acadia Drive" and "Acadia Street" have been corrected to "Acacia Drive;" this is a non-substantive revision. Please see Master Response 1, Aesthetics, for a discussion and analysis of additional KOPs and visual simulations responding to this and other comments.

A8-22 Please see Response to Comment A8-3 regarding the City's undergrounding policies, which do not apply to this Project and do not have an effect on the analysis of visual impacts. The analysis of visual impacts in Draft IS/MND Section 3.1, Aesthetics, uses an established methodology to determine the significance of Project impacts based on the degree of visual contrast and viewer sensitivity. The comment's statement that any above ground facility would result in a significant impact is unsupported by any evidence. Please see Master Response 1 regarding additional KOPs and visual simulations.

- A8-23 Please see Master Response 1 and Response to Comment A8-22. Substantial evidence supports the IS/MND's conclusions regarding visual impacts; an established methodology has been thoroughly described and consistently applied to numerous representative public viewpoints in the Project area, and established thresholds of significance have been used to determine the Project's impacts. The level of information provided in the IS/MND is adequate, and no mitigation measures are required.
- A8-24 Draft IS/MND Figure 3.2-1 depicts farmland types consistent with 2016 mapping from the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), as stated in the text and shown in the "Source" note under the figure. This is consistent with CEQA Guidelines Appendix G Section 2, Question a (see Draft IS/MND page 3.2-1). San Marcos General Plan Figure 4-4, Agricultural Areas, also depicts FMMP mapping, but lists 2008 as the date of the source mapping. The FMMP updates County farmland maps every two years. Between the 2008 and 2016 FMMP maps for San Diego County, an area of land in the Project vicinity was redesignated from Unique Farmland to Farmland of Local Importance. Figure 3.2-1 correctly depicts applicable mapping of farmland based on existing soil types, irrigation, and other relevant factors. No change to Figure 3.2-1 or to the analysis in Section 3.2 is warranted.
- A8-25 Please see Response to Comment A8-44.
- A8-26 The statement that "All construction would occur within existing rights-of-way (ROW), franchise positions (city/county roadways), and SDG&E fee-owned property" on Draft IS/MND page 3.4-2 is incorrect and inconsistent with descriptions of the need for new ROW in Segment 1 and the use of non-SDG&E-owned staging areas described in Draft IS/MND Sections 2.4.4 and 2.5.3, respectively. This statement is therefore deleted. The question of land ownership or easement is not relevant to the physical impacts on biological resources; therefore, this deletion results in no change to the analysis in Draft IS/MND Section 3.4. SDG&E has not provided computer-aided design (CAD) files to CPUC, nor are any necessary for completion of CPUC's CEQA process because the geographic information system (GIS) files depicting the detailed locations of Project facilities and route maps, as reflected in Draft IS/MND Appendix A, are sufficient to inform the level of analysis needed to determine the significance of impacts and mitigation requirements under CEQA. Therefore, the CPUC is unable to provide such files to the City.
- A8-27 The City's concern for the potential lack of sufficient mitigation credits at the time of Project construction is acknowledged. It is this potential that has prompted CPUC to require Mitigation Measure BIO-1, which requires SDG&E to secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the Project area (referred to as the biological study area, or BSA, in the Draft IS/MND) or having moderate or high potential to occur in the areas impacted by the Project. This mitigation measure goes on to require that the conditions of these authorizations be equally or more effective than the NCCP protocols and practices.

CPUC has made clear in the mitigation measure and MMRCP that SDG&E and its contractors must implement these requirements, if necessary (i.e., lack of sufficient mitigation credits), and CPUC mitigation monitors will inspect compliance to ensure the resources would not be impacted. According to the most recent SDG&E Low-Effect Habitat Conservation Plan 2018 Summary Report, SDG&E would have approximately 169 acres of mitigation credit available as of August, 2019 (SDG&E 2019a, SDG&E 2019b). However, in order to ensure sufficient take or mitigation credits provided under the NCCP at the time of Project construction, Mitigation Measure BIO-1 will remain as written to avoid and reduce impacts.

- A8-28 At this time, SDG&E has not proposed to remove trees; therefore, no removal is addressed in the Draft IS/MND. SDG&E proposes only tree trimming pursuant to state requirements. CPUC General Order 95, Rule 35, requires that public utilities maintain specific clearances between vegetation and high-voltage transmission lines. This state law preempts local authority with respect to the management of vegetation within a power line ROW. Therefore, SDG&E is not required to obtain permits from local governments to maintain required vegetation clearances. The comment does not specify where tree topping procedures have occurred within the City of San Marcos; therefore, the CPUC is unable to review specific instances of SDG&E's vegetation management along existing power lines. However, the Project would not substantially change the vegetation management requirements compared to existing power lines within the ROW. In Segments 1 and 3, the Project conductors would be located in the same alignment as existing power lines and the voltages would not change. In Segment 2, the Project would add conductors within the ROW, potentially increasing the width in which required vegetation clearances must be maintained; however, in most of Segment 2, the conductors are substantially higher than the height of existing vegetation and trimming under General Order 95, Rule 35 would not be needed. Table 2-11 on Draft IS/MND page 2-44 shows that the minimum conductor to ground clearance for 69 kV power lines is 30 feet. In Very High Fire Threat Zones (such as most of the Project area), the minimum radial clearance around conductors per General Order 95, Rule 35 is 48 inches (4 feet). Therefore, for trees located below 69 kV power lines, the maximum height that can reasonably be expected to be maintained is 26 feet.
- A8-29 The comment is categorized as a comment on biological resources, but there is no indication in the comment of how the location of the Project within anticipated future development of a subdivision would affect biological resources. Consistent with CEQA Guidelines Appendix G, the Draft IS/MND analyzed whether the Project would "physically divide an established community." The potential future development is not an established community, and the comment does not describe an environmental impact or a conflict with or physical division of an established community.
- A8-30 The CPUC acknowledges the City's request that the non-confidential cultural resources documents provided in SDG&E's Proponent's Environmental Assessment (PEA) be included as an appendix to the CPUC's document. The cultural resources appendix in SDG&E's PEA consists of two parts: PEA Appendix 4.5-A: Inventory of Cultural

Resources along San Diego Gas & Electric Company's TL 6975 Project and PEA Appendix 4.5-B: Archaeological Survey Report. The CPUC notes that SDG&E included the note "(Confidential)" in the title of Appendix 4.5-A and not in the title of Appendix 4.5-B. Nonetheless, PEA Appendix 4.5-B is a supplement to the initial archaeological survey provided in PEA Appendix 4.5-A and was prepared in response to changes to staging areas, stringing sites, and pole locations which occurred subsequent to the initial survey. The survey report provided in PEA Appendix 4.5-B also contains confidential resource site information and therefore is also confidential. Therefore, in compliance with federal and State laws and regulations protecting the confidentiality of known archaeological sites and resources, CPUC cannot include this survey report as an appendix to this document. The non-confidential information within these SDG&E-provided documents is summarized in Draft IS/MND Section 3.5, Cultural Resources. Specifically, please see Draft IS/MND pages 3.5-9 through 3.5-19 ("Methodology and Known Resources"), including Table 3.5-1, Resources Within and Adjacent to the Study Area.

- A8-31 The quantity of excavated materials is provided on Draft IS/MND page 2-34: "it is estimated that up to 3,751 cubic yards of cut would be generated." The City's issuance of ministerial grading permits is outside the scope of CPUC's CEQA review.
- A8-32 This comment is acknowledged and is not within the scope of CPUC's CEQA review of the Project.
- A8-33 The Draft IS/MND identifies those properties may be used as staging areas on pages 2-36 and 2-37, and CEQA-relevant impacts are evaluated throughout the Draft IS/MND technical sections. As described on Draft IS/MND page 2-35, "SDG&E generally does not hold ownership or easement over these candidate sites; therefore, some may not be available when pre-construction activities...would occur." Thus, it is acknowledged that SDG&E would need to obtain permission to use these sites, and that some of the sites may not be available for use during Project construction. Questions of land acquisition and economics are not within the scope of CPUC's CEQA review of the Project.
- A8-34 The Draft IS/MND identifies what additional ROW would be acquired on page 2-23 on mapbook Figures A-2 through A-6 in Draft IS/MND Appendix A. CEQA-relevant impacts of this expanded ROW are evaluated throughout the Draft IS/MND technical sections. Questions of land acquisition and purely economic impacts are not within the scope of CPUC's CEQA review of the Project. APM PS-2 contains SDG&E's commitment to coordinate construction activities with property owners or authorized agents for each affected park, trail, or recreational facility prior to construction in these areas. This is reinforced by GO 131-D, which requires utilities to consult with local agencies regarding land use matters and providing the opportunity to CPUC interject if differences arise that cannot be resolved directly between the utility and local agency.

- A8-35 CPUC General Order 131-D states that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects that are subject to CPUC jurisdiction, including the Project. Therefore, local land use approvals are not required. Please also see Response to Comment A8-34.
- A8-36 The CPUC understands that the proposed widened ROW along San Marcos Boulevard would not change SDG&E's existing vegetation management approaches along Segment 1, with the exception that the taller poles may raise high-voltage conductor such that required vegetation clearances would allow for somewhat taller vegetation to remain under the power line than under current conditions. Please see Response to Comment A8-28 with regard to Project effects on existing trees. As noted in Response to Comment A8-34, the Draft IS/MND identifies what additional ROW would be acquired on page 2-23 on mapbook Figures A-2 through A-6 in Draft IS/MND Appendix A. CEQA-relevant environmental impacts of the Project (including aesthetics/visual), including this expanded ROW, are evaluated throughout the Draft IS/MND technical sections. Questions of land acquisition and purely economic impacts are not within the scope of CPUC's CEQA review of the Project.
- A8-37 The CPUC acknowledges the City's request that the PEA, including PEA Appendix 4.12, Noise, referenced in the Draft IS/MND, be included as appendices to the CPUC's document. As noted in Comment A8-2, SDG&E submitted the PEA to CPUC in November 2017 per the requirements of CPUC General Order 131-D, Sections IX.B.1.a-f. In March 2018, the CPUC deemed SDG&E's application complete and created a website for the Project, where the PEA and all its appendices were made available for download at that time. These documents continue to be available for download and are therefore easily accessible to those wishing to review them. The website address is the same as that for the Project as a whole, including the IS/MND:
- <https://www.cpuc.ca.gov/environment/info/esa/TL6975>
- Specifically, the PEA Noise Appendix was made available as of March 2018 at the following address:
- https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/08_Appendix_4.12_NOISE_PEA_SDGE_TL6975.pdf
- The PEA and Appendices are not required to be appendices to the IS/MND, and the request to include them as appendices to the IS/MND is not a comment on the adequacy or accuracy of the CEQA analysis.
- A8-38 Please see subheading "Lighting" under Response to Comment A8-5.
- A8-39 Please see subheading "Noise" under Response to Comment A8-5.
- A8-40 The comment identifies the need for additional clarity in Draft IS/MND Section 3.13, Noise, subsection 3.13.2, Regulatory Setting. On Draft IS/MND page 3.13-14, under City of San Marcos General Plan Policy N-1.1, the note "[see Table 3.13-4]" was intended to

indicate that the Draft IS/MND recreated San Marcos' General Plan Table 7-3 in Table 3.13-4. In fact, the reference should have been to Table 3.13-3, titled "County of San Diego Noise Compatibility Guidelines." That table is substantially similar to the City of San Marcos' General Plan Table 7-3, and is revised in the Final IS/MND as follows:

TABLE 3.13-3
COUNTY OF SAN DIEGO AND CITY OF SAN MARCOS GENERAL PLAN NOISE COMPATIBILITY GUIDELINES

Land Use	Community Noise Exposure - CNEL (dBA)						
	50	55	60	65	70	75	80
A. Residential—single family residences, mobile homes, senior housing, convalescent homes							
B. Residential—multi-family residences, mixed-use (commercial/residential)							
C. Transient lodging—motels, hotels, resorts							
D. Schools, churches, hospitals, nursing homes, child care facilities							
E. Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F. Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G. Office/professional, government, medical/dental, commercial, retail, laboratories							
H. Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							

- ☐ ACCEPTABLE—Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.
- ☐ CONDITIONALLY ACCEPTABLE—New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table 3.13-3, Noise Standards. If a project cannot mitigate noise to a level deemed acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.
- ☒ CONDITIONALLY ACCEPTABLE in City of San Marcos. ACCEPTABLE in San Diego County
- ☐ UNACCEPTABLE—New construction or development shall not be undertaken.

NOTE: Land use descriptions vary slightly, but not substantively, between County of San Diego and City of San Marcos general plans.

SOURCE: County of San Diego, 2011, Table N-1; City of San Marcos, 2012, Table 7-3

Furthermore, Table 3.13-4 is substantially similar to the City of San Marcos' General Plan Table 7-4, and is revised in the Final IS/MND as follows:

TABLE 3.13-4
COUNTY OF SAN DIEGO AND CITY OF SAN MARCOS GENERAL PLAN NOISE COMPATIBILITY
GUIDELINES/STANDARDS

1. The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
2. The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
3. The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA L_{eq} (one-hour average).
4. For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area: (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet, (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area; (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.
5. For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
6. For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
7. For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
8. The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
9. For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" in ~~Table N-1 (see Table 3.12-2)~~ in County table N-1 or by the City of San Marcos; see IS/MND Table 3.13-3 or an equivalent one-hour noise standard.

SOURCE: County of San Diego, 2011, Table N-2; City of San Marcos, 2012, Table 7-4

A8-41 Consistent with the analysis in Draft IS/MND Section 3.13, which acknowledges the potential for significant nighttime construction noise impacts as discussed in Response to Comment A8-5, the first sentence of Mitigation Measure NOI-1 has been clarified as follows:

To reduce ~~daytime~~ noise impacts due to construction of the Project near sensitive receptors, SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan).

A8-42 Please see Response to Comment A8-7.

A8-43 The Project may require blasting; however, the specific locations of blasting activities are not yet known and would depend on conditions encountered in the field. Therefore, a Blasting Plan as required under Mitigation Measure NOI-2 and a Vibration Reduction Plan as required under Mitigation Measure NOI-3 cannot reasonably be prepared at this time, as these plans would be based on site-specific conditions such as geotechnical specifications at the blasting location and the distance and nature of surrounding

structures. Both mitigation measures require SDG&E to submit these plans to CPUC at least 14 days prior to construction activities, and Mitigation Measure NOI-2 requires that the Blasting Plan include a current/valid copy of an Explosives Permit issued by the San Diego County Sheriff's Office as well as documentation that all local blasting requirements have been adhered to. In the event that blasting is needed within the City of San Marcos, local requirements would include those specified in Municipal Code Chapter 17.60, Blasting Operations, which requires that the contractor notify and obtain a Certificate of Authorization from the City. Therefore, at that time, blasting-related construction details and plans would be available to the City through its ministerial construction permitting process.

- A8-44 The comment raises two points regarding recreational impacts resulting from the Project. The first point alleges that the Draft IS/MND does not provide sufficient evidence to support the finding that the construction noise and blasting plan will adequately address the overall impact of the construction to users of trails and (specifically) Simmons Family Park. It should be noted that Simmons Family Park would be considered a sensitive receptor location as the term is used in the Air Quality and Noise analyses, as youth would be presumed to be present at the park. In response to this comment, text on Draft IS/MND page 3.16-8 is revised to clarify how the mitigation measures would reduce impacts to park and trail users, as follows:

The Construction Noise, Blasting, and Vibration Reduction plans required in Mitigation Measures NOI-1, NOI-2, and NOI-3, respectively, contain numerous provisions for direct noise and vibration reduction measures. Requirements for exhaust mufflers on construction equipment, noise barriers such as noise shields, barriers, blankets, or enclosures to be used, where feasible, adjacent to or around noisy construction equipment are included to reduce direct impacts. As described in Mitigation Measure NOI-1, the noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source. In addition to the requirements for direct noise reduction in Mitigation Measure NOI-1, provisions for public notice and correction for exceedances are also required. These provisions include a publicly identifiable hotline (telephone number) posted at affected trailheads and in locations of sensitive receptors, that can be utilized to report noise-related disturbances to the community, along with measures requiring logging of complaints and other feedback and requirements for the implementation of corrective measures for noise and vibration exceedances.

The comment also alleges that the analysis does not address how redistribution of park use in the community will impact traffic and air quality in the region. This assumes that park users would be forced to drive outside of the immediate area in order to access parks. The City of San Marcos contains numerous parks in the city center that would not be impacted by the Project and would remain accessible through pedestrian and/or local travel during construction, and due to the short-term nature of construction at any one location, to attempt to estimate the nature of any redistribution of park use in the

community would be speculative. Therefore, there is no evidence that redistribution of park use in the community would impact traffic and air quality in the region, and no quantification of indirect impacts from a speculative assessment of that outcome is provided.

The second point pertains to City coordination for the trail closure schedule. The comment states that SDG&E will need to obtain approval of a park and trail closure schedule with City Public Works Department to ensure that the city can manage impacts on city events and activities. APM PS-2 included in Section 3.16 already contains requirements pertaining to this provision. This is reinforced by GO 131-D, which requires utilities to consult with local agencies regarding land use matters and providing the opportunity to CPUC interject if differences arise that cannot be resolved directly between the utility and local agency.

A8-45 The comment does not specify what significant environmental impact on parks or trails it alleges would occur as a result of temporary effects on City events and activities, and there is no evidence in the record of a significant environmental impact. APM PS-2 contains SDG&E's commitment to coordinate construction activities with property owners or authorized agents for each affected park, trail, or recreational facility prior to construction in these areas.

A8-46 Please see Response to Comment A8-5.

A8-47 Please see Response to Comment A8-5.

A8-48 Please see Response to Comment A8-5.

A8-49 Please see Master Response 2, Wildfire, and Master Response 4, CEQA Process (regarding consideration of alternatives).

A8-50 SDG&E would not prepare the Final Construction Fire Prevention Plan pursuant to Mitigation Measure WIL-1 until that measure is adopted when and if the Project is approved. SDG&E's Draft Construction Fire Prevention Plan is provided as Appendix D of this Final IS/MND. This plan was included in SDG&E's PEA, which was provided to the public on the CPUC's Project website and cited in the Draft IS/MND. The website address is:

https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/07_Appendix_4.8-B_FIRE_PEA_SDGE_TL6975-2.pdf

A8-51 The Draft IS/MND does not include a subsection titled "Fire Jurisdiction & Land Ownership." Throughout Draft IS/MND Section 3.20, Wildfire, the San Marcos Fire Department is identified as an agency having jurisdiction (see, e.g., pages 3.20-1 and 3.20-13).

A8-52 In response to this comment, CPUC staff requested that SDG&E initiate a conversation with CAL FIRE about the Project-specific fire prevention plan. SDG&E provided a response indicating, in relevant part, the following:

In an effort to be responsive to the City's request, SDG&E has initiated contact with CAL FIRE personnel and has requested a meeting to discuss the project. The meeting date has yet to be scheduled. SDG&E will consider CAL FIRE's feedback on the project-specific plan and may elect to modify its plan as appropriate based on this feedback.

Once the CPUC issues the final CEQA document for the project, SDG&E will continue proactive communication with public safety and fire officials and all other community stakeholders. Until that time, SDG&E does not know the final project scope which makes it difficult to accurately brief stakeholders.

Upon issuance of the final CEQA document, SDG&E will set up meetings with City of San Marcos public safety officials - including fire officials - to discuss the scope and project-specific fire plan. In addition, the SDG&E Fire Coordinator assigned to support the project will reach out directly to the AHJ's covering the TL 6975 footprint (CAL FIRE, San Diego County Fire Authority, and the cities of Carlsbad, Escondido, San Marcos, and Vista). SDG&E will provide information relating to the project and our plan to prevent ignitions as well as the steps to follow should there be an ignition. In the event of a fire of any size occurring in the vicinity of the project, 911 is always the first call, even for extinguished fires. SDG&E will also provide general guidelines as to other emergency response procedures, and list mitigations for any at risk activities.

On a more companywide level, SDG&E coordinates with CAL FIRE and the fire departments in its service territory by providing access to the data that is gathered from the 170+ SDG&E weather stations. Each of these weather stations is associated with a particular distribution circuit or transmission line in the SDG&E service territory. SDG&E uses the information gathered from these weather stations to create a daily Fire Potential Index (FPI). The FPI is utilized by SDG&E's crews and contractors through the use of SDG&E's Operation and Maintenance Fire Prevention Plan on a daily basis to guide SDG&E's daily work practices. This plan is updated annually, and all SDG&E field personnel are required to participate in the annual training on fire prevention and the Plan. (SDG&E, 2019a)

Although CPUC cannot compel CAL FIRE to provide approval or disapproval for SDG&E's plan pursuant to Mitigation Measure WIL-1, language already in that mitigation measure requires that SDG&E contact and consult with CAL FIRE (Draft IS/MND page 3.20-13). As described in SDG&E's response to CPUC inquiry about early coordination with CAL FIRE, such coordination already is underway.

- A8-53 CPUC does not currently have construction-level drawings from SDG&E, as they are not required to complete the CEQA process and likely would not be completed until later in the CPUC's overall decision-making process.
- A8-54 CPUC will consider additional comments from San Marcos Fire Protection District, if submitted, consistent with the agency's process for addressing comments received after publication of a Final IS/MND.
- A8-55 Please see Master Response 4, CEQA Process.
- A8-56 Please see Master Response 1, Aesthetics, and Response to Comment A8-5, for detailed discussions of the substantial evidence supporting CPUC's significance conclusions regarding visual, noise, lighting, air quality, and transportation impacts. Regarding alternatives consideration, please see Master Response 4, CEQA Process.



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Codes • (858) 565-5920 Building Services
www.SDCPDS.org

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

May 30, 2019

California Public Utilities Commission
ATTN: San Marcos-Escondido TL6975 Project
c/o Environmental Science Associates/DDD
1425 N. McDowell Blvd., Ste 200
Petaluma, CA 94954

Via e-mail to: TL6975SanMarcos@esassoc.com

REQUEST FOR COMMENTS ON THE CALIFORNIA PUBLIC UTILITIES COMMISSION'S INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR SAN DIEGO GAS & ELECTRIC'S SAN MARCOS-ESCONDIDO TIE LINE 6975 PROJECT

To Whom It May Concern,

The County of San Diego (County) reviewed the California Public Utilities Commission's (CPUC) Initial Study/Mitigated Negative Declaration (IS/MND) for San Diego Gas & Electric's (SDG&E) San Marcos-Escondido Tie Line 6975 Project, dated April 1, 2019.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

PLANNING & DEVELOPMENT SERVICES

1. The County of San Diego Planning & Development Services (PDS) has concerns regarding the proposed Icon 3PL Materials Yard auxiliary staging yard located at 12332 Vigilante Road in Lakeside. The property is currently subject to code enforcement due to violations of various regulations including the County Grading Ordinance, County Resource Protection Ordinance, County Damage Prevention Ordinance and California Building Code. A large volume of earth has been placed within a FEMA mapped floodway and a retaining wall has been partially constructed to support the unpermitted earthwork. The location of the proposed storage yard on top of the unpermitted fill within the mapped floodway could represent a significant health safety issue in the event of a flood. Additional analysis of the potential impacts to the floodway should be required as part of the proposed project. The proposed site is also permitted and operating as an active surface mining operation per local and State requirements under the Surface Mine and Reclamation Act (SMARA). The proposed use for a storage yard is not included in the use permits or reclamation plan for the site. Modifications or Minor Deviations to these permits would be required to authorize use of the site as a storage yard.

A9-1

PARKS AND RECREATION

1. The County's Sage Hill Preserve and Escondido Creek Preserve are located within the Project footprint and should be included in the analysis in the IS/MND. SDG&E's Subregional Natural Community Conservation

A9-2

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Page 2

- Plan (NCCP) requires that biological and cultural resource surveys are performed within the existing easements/Right-of-Way (ROW). The Department of Parks & Recreation (DPR) requests the copies of the biological and cultural resource surveys and reports pertaining to the SDG&E easements/ROW in DPR facilities and on unincorporated County land be sent to DPR. A9-2 (Cont.)
2. For any work proposed within the Sage Hill Preserve and Escondido Creek Preserve DPR recommends that any Project construction activities, impacts, and general activities stay within the SDG&E easement/ROW. A9-3
 3. For any Project construction activities, impacts, and general activities proposed outside of the SDG&E easement/ROW or for access to the SDGE easement/ROW that will enter, pass through, or potentially impact DPR facilities and programs, DPR requires that SDG&E obtain a Right of Entry (ROE) permit from DPR. A9-4
 4. Public notices should be placed in any public venues affected by construction at least 30 days prior to the start of construction activity. The notifications should be placed at wilderness and recreation facilities, trail crossings, rest stops, desert centers, resource management offices, and public facilities (e.g., schools, parks, and nature preserves). A9-5
 5. The Project has the potential to cause direct and indirect impacts to County-managed trails, trail easements, future regional trails, and DPR trails planned in the County Community Trails Master Plan (CTMP). This may include the Wild Willow Hollow Trail, the Spring Trail, and possibly additional trails and recreational facilities. The IS/MND should analyze any potential direct and indirect impacts to County-managed trails, trail easements, future regional trails, and DPR trails planned in the County CTMP. A9-6
 - a. SDG&E/CPUC should notify DPR of any potential direct and indirect impacts to County-managed trails, trail easements, future regional trails, and DPR trails planned in the County CTMP.
 6. The draft IS/MND Table ES-2/page ES-23 section 3.16.c indicates that a return to pre-construction state will be "approximate." DPR requests clarification on "approximate." County DPR also requests that, pursuant to County DPR standards, that trails are returned to the same or better condition post construction. SDG&E/CPUC should coordinate with DPR to ensure that any trails are returned to the same state or improved after construction activities. A9-7
 7. Page 3.16-2 in the draft IS/MND, under County Department of Parks and Preserves subheading, includes a discussion of "Rancho La Costa Preserve." This should be moved below under the City Parks subheading as it is a City of Carlsbad facility/preserve, not County. A9-8
 8. Table 3.16-1 in the draft IS/MND is titled "Parks and Recreational Trails in the Study Area." This should be expanded to include all County recreational facilities and County-managed facilities in order to appropriately examine and analyze the nearest Project components to County facilities and to the same standard as other jurisdictional facilities. As written, the table only includes City Parks, not County DPR facilities. Possible facilities that need to be included are County DPR parks, trails, preserves (Sage Hill Preserve and Escondido Creek Preserve), DPR-managed regional trails, and trails outlined in the CTMP. A9-9
 9. For public trail closures, the SDG&E/CPUC should post information on the trail detour at applicable resource management offices and post the notice on the trail within two miles of the detour. For recreation facilities, the notice will be posted along the access routes to known recreational destinations that would be restricted, blocked or detoured and will provide information about other recreation areas that can be used during construction or closure of these facilities. A9-10
 10. The preliminary draft North County Plan Multiple Species Conservation Program (MSCP) includes wildlife corridors that link lands within the County's MSCP. The MSCP also includes corridors that link county lands to preserved lands within other jurisdictions. Habitat linkages and corridors are critical to the success of the. A9-11

To Whom It May Concern
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draft North County Plan, especially considering that species movement may increase in frequency as a result of climate change. The draft IS/MND Biological Resources sections should identify the region's preserved lands as an interconnected web, and not look at lands within jurisdictional silos.

- a. If avoidance of critical habitat corridors across the region is not possible, SDG&E/CPUC should work with the County and other neighboring jurisdictions to identify appropriate mitigation sites, and ensure that they are properly preserved, managed, and monitored per standards set forth in local habitat conservation planning documents.

A9-11
(Cont.)

11. In addition to the MSCP, the County also has an adopted Resource Protection Ordinance (RPO) and a Biological Mitigation Ordinance (BMO) (specific to the South County) that should be included in the IS/MND analysis.

A9-12

TRANSPORTATION/TRAFFIC

1. County-maintained roadways are located within the proposed Project area. Based on the maps located in the Draft IS/MND, the following County-maintained roads and facilities may be impacted:

- a. Discovery Street
- b. Questhaven Road
- c. Country Club Drive

2. The three Staging Areas proposed in the unincorporated county (MND Figure 2-11) may impact additional roadways including, but not limited to:

- a. Harmony Grove Road
- b. Rock Springs Road
- c. Vigilante Road

A9-13

3. Any pavement, curb/gutter/sidewalk, culverts, utilities, traffic control-related infrastructure, as well as any other infrastructure within the County-maintained road right-of-way that is damaged by the Project shall be replaced to its original condition or better to the satisfaction of the County Department of Public Works (DPW). Such activities may also require an encroachment and/or excavation permit in consultation with the County. Any roadway excavation must also be conducted in accordance with the County's Pavement Cut Policy. The County requests that SDG&E coordinate with County DPW prior to any modification of County-maintained roads.

4. The Draft Initial IS/MND (Figure 2-4, page 2-9) shows Discovery Street as part of the Project's proposed Segment 1 – Rebuild. Discovery Street is a public roadway with a ROW width of 84 feet along the Project alignment. The existing SDG&E wood poles on Discovery Street are within the public ROW and appear to be within the clear recovery zone (AASHTO Green Book, Chapter IV: "...the unobstructed, relatively flat area provided beyond the edge of the traveled way for the recovery of errant vehicles). To minimize conflicts within the public ROW, the County recommends the relocation of utility poles (or undergrounding of utilities) so that the poles are outside of the clear recovery zone, or as far away from the road's edge of pavement as possible. In addition, any new or relocated poles must not impede American with Disabilities Act (ADA) requirements, pedestrian facilities (i.e., sidewalks, pedestrian ramps), or bicyclist facilities (e.g., bike lanes). These recommendations apply to any proposed pole to be rebuilt/relocated within or adjacent to County public road ROW.

A9-14

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WATERSHED PROTECTION PROGRAM

1. The Project could potentially generate stormwater impacts to adjacent private parcels located in the unincorporated county. Therefore, the Project must consider the following items:
 - a. Compliance with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100). The Project should consider implementing permanent Site Design, Source Control, Pollutant Control, and Hydromodification Management in accordance with the applicable municipal jurisdiction's BMP Design Manual as required by the San Diego Municipal Storm Water Permit Order No. R9-2013-0001.
 - b. The Project must consider construction BMPs and associated plans for conformance with the County's Grading Ordinance, Watershed Protection Ordinance and State of California's Construction General Permit for construction activities located within the unincorporated county.

A9-15

FLOOD CONTROL

1. Any proposed grading or development within a County and/or FEMA-mapped floodway or floodplain will require close coordination and review by County Flood Control. The Project must ensure compliance with all requirements of the County's Flood Damage Prevention Ordinance and Federal FEMA Regulations.
2. If the Project proposes any alterations of the floodway or floodplain (e.g., changes to the water surface elevation or lines of inundation), this would require a County permit and Conditional/Letter of Map Revision (CLOMR/LOMR) in accordance with FEMA Regulations and County Flood Damage Prevention Ordinance Section 811.503(b).
3. The Draft Initial IS/MND (page 2-35) identifies a potential staging area located at 12332 Vigilante Road in the unincorporated community of Lakeside. This site is located within the County-designated 100-year floodway of the San Diego River. Per Section 811.506 of the County Flood Damage Prevention Ordinance, use of this staging area within the floodway is not permissible without demonstration of a "no rise" certification.

A9-16

A9-17

A9-18

SPECIAL DISTRICTS

1. County Permanent Road Division (PRD) 99-Allondra/Via Del Corvo is located within the proposed Project area (see Attachment A). The County requires notification of the proposed start and completion dates for any work performed within PRD 99 in order to allow inspection of the roads and facilities prior to commencing construction. Any County PRD road that is damaged by the Project shall be replaced to its original condition or better to the satisfaction of the County DPW.

A9-19

WASTEWATER

1. Based on the figures provided in the Draft IS/MND, the proposed Project would traverse through the San Diego County Sanitation District located in Harmony Grove (see Attachment B), and there could be potential impacts to the newly installed infrastructure and sewer lines. As-built engineering schematics are currently in progress to illustrate the location of the infrastructure and sewer lines associated with the Harmony Grove Village Wastewater facility. Until such plans are finalized, the County requires notification and coordination by SDG&E/CPUC prior to commencing construction to ensure the wastewater facilities are not impacted.
2. Please be aware effective June 1, 2019, Rincon del Diablo Municipal Water District will become the new owner and operator of the Harmony Grove Village Wastewater infrastructure and sewer lines. After June 1,

A9-20

A9-21

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2019, notification and coordination by SDG&E/CPUC must occur with the Rincon del Diablo Municipal Water District. ↑ A9-21
(Cont.)

AIRPORTS

1. Based on the Draft IS/MND, it is anticipated that helicopters will be used to facilitate construction activities Project wide. Section 2.5.7 of the IS/MND states that light or medium-duty helicopters (e.g., K-Max and A-Star) would be deployed and McClellan-Palomar Airport would be used as a helicopter landing staging area. McClellan-Palomar Airport is a County-owned and managed facility under regulation by the Federal Aviation Administration (FAA), which has the sole control of the flight of aircraft. County Airports management reached out to Ralph Fletcher, SDG&E Project Manager, on April 25, 2019, to discuss the types of helicopters and use of airport ground space for the proposed Project analyzed in the IS/MND. A9-22
2. The County requests that SDG&E/CPUC coordinate with the Airport Manager of McClellan-Palomar Airport a minimum of three business days in advance of the commencement of Project operations or staging equipment/supplies at the airport. A9-23
3. The County requests that any helicopter operations associated with the proposed Project conform to the suggested air traffic patterns and "Quiet Hours" guidelines established in the airport's Voluntary Noise Abatement Procedures (VNAP) to reduce noise impacts to surrounding residential areas. A9-24
<https://www.sandiegocounty.gov/content/sdc/dpw/airports/palomar/noiseabatement.html>

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,



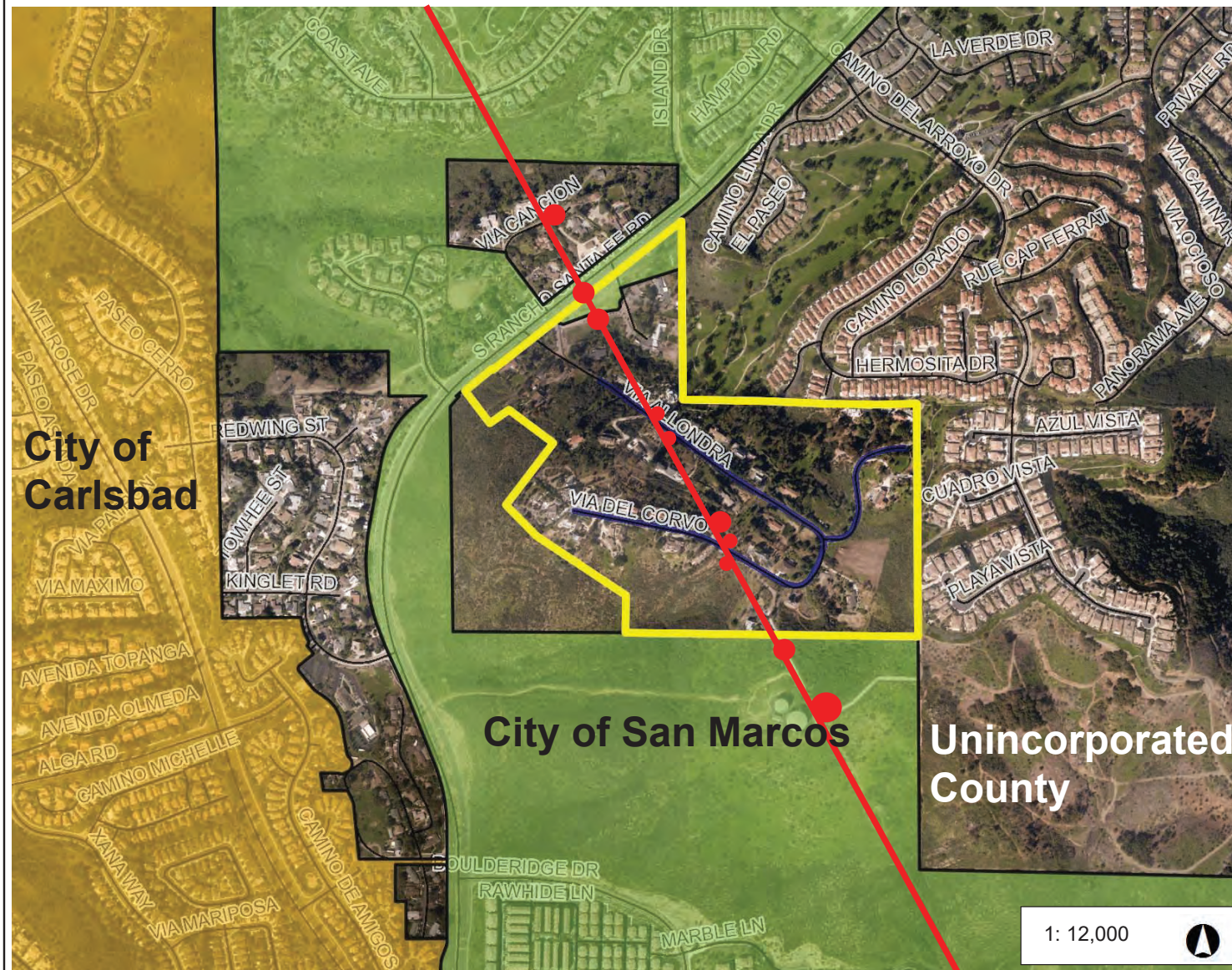
Eric Lardy, AICP
Chief, Advance Planning Division
Planning & Development Services

Enclosure: Attachment A – County Permanent Road Division 99
Attachment B – San Diego County Sanitation District Boundary (Harmony Grove)

E-mail cc: Benjamin Mills, Policy Advisor, Board of Supervisors, District 5
Mel Millstein, Group Program Manager, LUEG
Lara Barrett, CAO Staff Officer, LUEG
Marcus Lubich, Sr. Park Project Manager, DPR
Emmet Aquino, Park Project Manager, DPR
Jeff Kashak, Land Use/Environmental Planner, DPW
Kimberly Jones, Land Use/Environmental Planner, DPW
Conor McGee, Land Use/Environmental Planner, PDS
Sharon Ippolito, Administrative Analyst, PDS



County Comment Letter: Attachment A



Legend

- County Permanent Road Division (PRD) 99
- PRD Roads
- City of Carlsbad
- City of San Marcos
- Proposed Project work areas & staging yards
**Conceptual drawings based on Appendix 3-A Route Mapbook*

1: 12,000



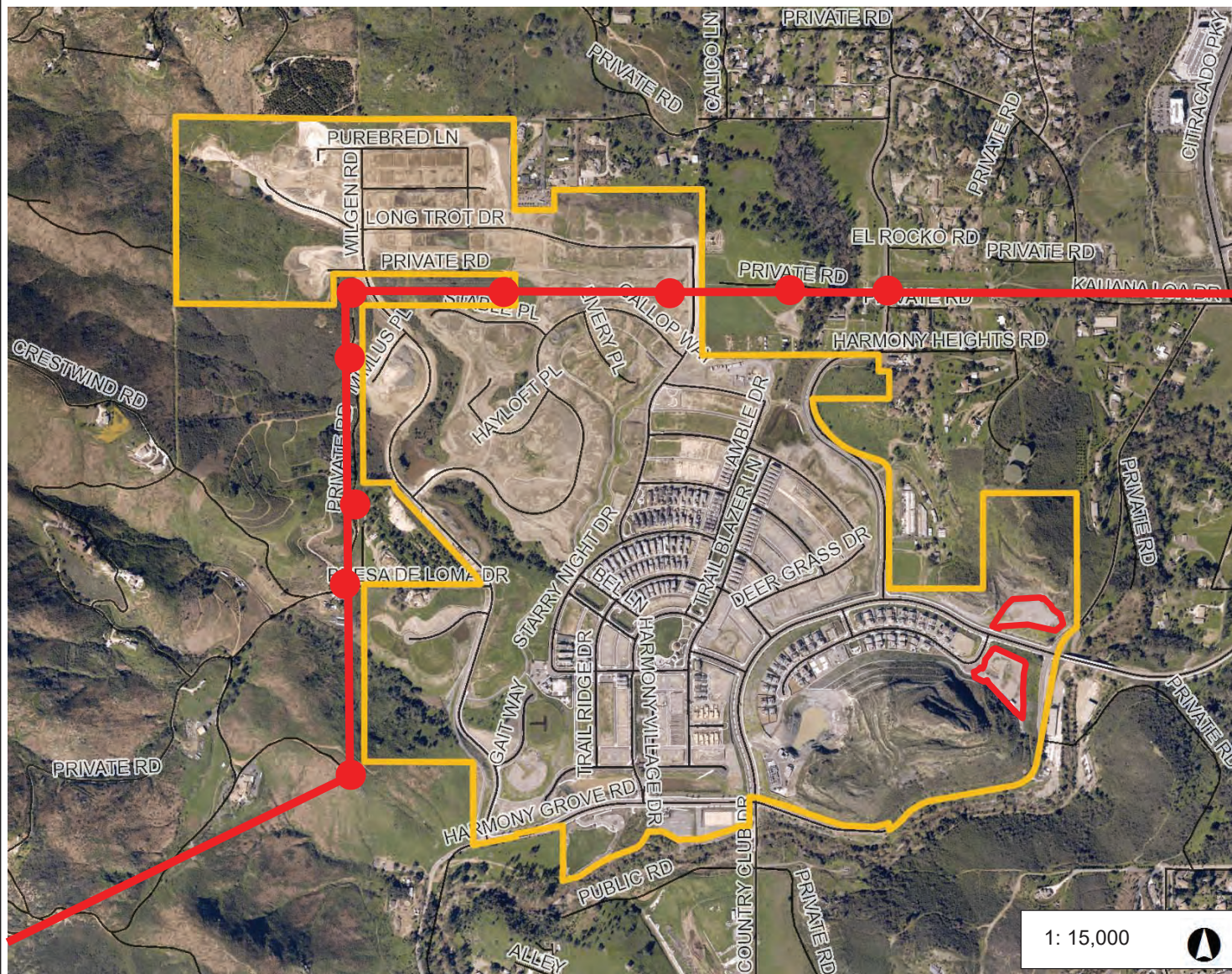
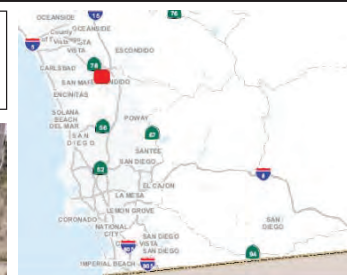
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Department of Public Works

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
THIS MAP IS NOT TO BE USED FOR NAVIGATION



County Comment Letter: Attachment B



Legend

San Diego County Sanitation District Boundary (Harmony Grove)

Proposed Project work areas & staging yards
**Conceptual drawings based on Appendix 3-A Route Mapbook*

Notes

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 Department of Public Works

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.
 THIS MAP IS NOT TO BE USED FOR NAVIGATION

Letter A9: County of San Diego

- A9-1 The presence of the proposed staging yard at 12332 Vigilante Road within a 100-year flood zone is acknowledged on Draft IS/MND page 3.10-4 and in Figure 3.10-1. CPUC's understanding based on SDG&E's Proponents Environmental Assessment (PEA) is that "These auxiliary yards are not intended for use throughout the phases of the Proposed Project; they are intended for use only in extenuating circumstances." Therefore, in the event that the Icon 3PL Materials Yard is unavailable for Project use as a vendor drop site prior to materials delivery to the Project area, SDG&E would be able to use other staging areas identified and analyzed in the Draft IS/MND.
- A9-2 A portion of Segment 3 traverses the northern portion of the Sage Hill Preserve along its northern boundary. A portion of Segment 3 also the northern portion of the Escondido Creek Preserve. Although the San Diego County Department of Parks and Recreation identifies the Escondido Creek and Sage Hill preserves as recreational facilities, these preserves were not identified in their respective resource management plans as being open to the public; therefore, the analysis assumed they were not utilized for recreational purposes (San Diego County 2011, 2018). In response to this comment, given the proximity of the preserves to the Project's proposed overhead work in Segment 3, Table 3.16-1 has been modified to include these preserves. SDG&E will be responsible for obtaining and complying with all necessary permits required by the San Diego County Department of Parks and Recreation, including right-of-entry permits for County-owned and operated preserves. It is expected that SDG&E would comply with the requirements of the Department's right-of-entry permit, as noted in Response to Comment A9-4, which would include coordination regarding Project activities at or near Department facilities within the Project work area, including the sharing of survey results on County facilities.
- A9-3 As shown in the Power Line Route Mapbook provided in Appendix A of the Draft IS/MND, all Project work areas would be limited to within the SDG&E ROW, including the portion of ROW which traverses the Sage Hill and Escondido Creek preserves. Additionally, Mitigation Measure BIO-3 found in Section 3.4.4 of the Draft IS/MND requires flagging work area limits, as well as monitoring by a qualified biologist, to ensure work activities remain within those areas.
- A9-4 This comment is acknowledged and is not within the scope of CPUC's CEQA review of the Project. SDG&E will be responsible for obtaining and complying with all necessary permits required by the San Diego County Department of Parks and Recreation, including coordination of work activities within Department lands and sharing of information.
- A9-5 APMs PS-1 through PS-3 address public notification for impacts on recreational facilities. APM PS-1 requires SDG&E to provide the public with advance notification of construction activities. APM PS-2 requires coordination with property owners and/or authorized agents for each affected park, trail, or recreational facility prior to construction. APM PS-3 requires signage advising recreationalists of alternative park access and parking in the event Project construction temporarily affects facility parking.

It is expected that SDG&E would comply with the requirements of the Department's right-of-entry permit, as noted in Response to Comment A9-4, which would include coordination regarding Project activities at or near Department facilities within the Project work area.

- A9-6 APMs PS-1 through PS-4 are proposed to address effects to trails and other recreational facilities in existence and use at the time of Project construction. CPUC acknowledges this comment and understands that the San Diego County Department of Parks and Recreation seeks to expand its network of trails throughout the County, including within the Project's study area. As noted in Draft IS/MND Section 2.5.12, Waste Management, Cleanup, and Post-Construction Restoration, SDG&E would restore all areas temporarily disturbed by Project activities to preconstruction conditions, including – but not limited to reseeded, and planting replacement vegetation. The discussion goes on to state that SDG&E would implement habitat restoration. The analysis presented in Draft IS/MND Section 3.4, Biological Resources, also requires implementation of a suite of NCCP protocols, APMs, and mitigation measures to ensure restoration of disturbed areas, which would include those planned for future trail or other recreational use. It is expected that SDG&E would comply with the requirements of the Department's right-of-entry permit, as noted in Response to Comment A9-4, which would include coordination regarding Project activities at or near Department facilities within the Project work area.
- A9-7 The comment is in reference to APM PS-4, which includes a statement of commitment from the applicant that “All parks, trails, and recreational facilities that are physically impacted during construction activities and are not directly associated with the new permanent facilities, will be returned to an approximate pre-construction state, while still allowing for SDG&E to safely operate and maintain the facilities, following the completion of the Project. SDG&E will replace or repair any damaged or removed public equipment, facilities, and infrastructure in a timely manner.” The comment requests clarification on the term “approximate” and notes that per County standards (potentially impacted) trails should be returned to the same or better condition post construction. As noted in Comment A9-4, any Project-related work, including access, that would enter, pass through, or potentially impact San Diego County Department of Parks and Recreation facilities would require a right-of-entry permit from the Department. Also, as noted in Response to Comment A9-6, restoration of temporarily disturbed areas is described in Draft IS/MND Section 2.5.12, Waste Management, Cleanup, and Post-Construction Restoration, and NCCP protocols, APMs, and mitigation measures to ensure restoration of disturbed areas are presented in Draft IS/MND Section 3.4, Biological Resources. Therefore, this comment is acknowledged; SDG&E will be responsible for restoring areas disturbed by Project-related activities to pre-construction conditions.
- A9-8 The jurisdiction of Rancho La Costa Preserve is acknowledged and the requested clarification has been made in the Final IS/MND.

- A9-9 As noted on Draft IS/MND page 3.16-1, the study area includes the footprint of all Project components, including all areas of temporary and/or permanent ground disturbance as well as neighboring parks, open space, and other lands used for recreational purposes within 0.5 mile of the Project alignment. Development of the analysis of recreational resources in the Draft IS/MND included a review of the County's General Plan, GIS resources, and San Diego County Department of Parks and Recreation website. In response to County comments on the Final IS/MND, the Department was contacted directly to obtain information on the facilities cited in its comments (A. Dulaney, pers. comm., 2019). Although the Department's website identifies the Escondido Creek and Sage Hill preserves as recreational facilities, they were not identified in their respective resource management plans as being open to the public; therefore, the analysis assumed they are not utilized for recreational purposes (San Diego County 2011, 2018). However, in response to this comment, given the proximity of the preserves to the Project's proposed overhead work in Segment 3, Table 3.16-1 has been modified to include these preserves. This table has also been modified to include information provided by the Department in response to the query posed in preparing this response.
- A9-10 Please refer to Response to Comments A9-4 and A9-5.
- A9-11 Pages 3.4-21 through 3.4-22 of the Draft IS/MND identify the various wildlife corridors in the region. As stated in Draft IS/MND Section 3.4, under Question d (see page 3.4-48 to 3.4-49), the Project would not adversely affect regional habitat corridors. That analysis is not limited to any specific jurisdiction. Project construction would occur consistent with all applicable requirements of the NCCP and 2017 Low-Effect HCP.
- A9-12 The Resource Protection Ordinance (RPO) and Biological Mitigation Ordinance (BMO) are documents applicable to the South County MSCP, which does not include the Project area and is not applicable to the Project.
- A9-13 The CPUC acknowledges that the roadways identified in this comment are maintained by San Diego County and that the list provided is not exhaustive. The County is identified in Table 2-13 as a jurisdiction from which the Project applicant (i.e., SDG&E) would need permits, approvals, and consultation, such as an encroachment permit for work within a public ROW. It is expected that SDG&E would comply with the requirements of those permits and approvals. As noted in Draft IS/MND Section 2.5.12, Waste Management, Cleanup, and Post-Construction Restoration, SDG&E would restore all areas temporarily disturbed by Project activities to preconstruction conditions, including restoring removed or disturbed curbs, gutters, sidewalks, and paved surfaces.
- A9-14 This comment is acknowledged. If the Project is approved, final design would be completed with consideration for existing and foreseeable physical conflicts. The design of the Project to avoid physical conflicts with other infrastructure is outside the scope of CPUC's CEQA review.

- A9-15 Section 3.10, Hydrology and Water Quality, includes consideration and discussion of the regulatory requirements noted in the comment, and the Project's conformance to the terms of the required Construction General Permit. As discussed in the section, the Project's potential generation of stormwater impacts would be negligible through implementation of SDG&E-proposed and Project-specific BMPs that would be required by the SWPPP and the construction general permit. Additionally, as noted in Section 3.10, prior to construction, SDG&E would obtain coverage from the RWQCB under the waiver of WDRs, Resolution R9-2014-0041, *Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region*. Construction dewatering and dredged material disposal to land are among the activities covered by this waiver.
- A9-16 The comment notes that any proposed grading or development within a county and/or FEMA mapped floodway or floodplain requires coordination and review by County Flood Control to ensure compliance with the County's Flood Damage Prevention Ordinance and federal FEMA regulations. This comment is acknowledged. If the Project is approved, final design would be completed with required consideration for locations within floodplains. The Draft IS/MND analysis is adequate for CEQA review based on the level of design available at this stage of Project development.
- A9-17 The comment notes that if alterations of the floodway or floodplain (e.g., changes to water surface elevation or lines of inundation) are proposed, a county permit and Conditional Letter of Map Revision or Letter of Map Revision would be required per FEMA and County regulations. The Project does not propose changes of the floodplain or grading within the regulatory floodway such that surface water elevations would be altered by Project activities.
- A9-18 The comment states that a proposed staging area (located at 12332 Vigilante Road in Lakeside) is within the County-designated 100-year floodway of the San Diego River. This staging area currently exists and functioning with comparable uses independent of the Project. The Project does not propose to place any permanent structures in the staging area. Please also see Response to Comment A9-1.
- A9-19 This comment is acknowledged and does not relate to the adequacy of the Draft IS/MND or raise significant environmental issues.
- A9-20 This comment is acknowledged. If the Project is approved, final design would be completed with consideration for existing and foreseeable physical conflicts. The design of the Project to avoid physical conflicts with other infrastructure is outside the scope of CPUC's CEQA review.
- A9-21 This comment is acknowledged and Rincon del Diablo Municipal Water District has been added to the Project mailing list.
- A9-22 This comment is acknowledged and does not relate to the adequacy of the Draft IS/MND or raise significant environmental issues.

A9-23 This comment is acknowledged and does not relate to the adequacy of the Draft IS/MND or raise significant environmental issues.

A9-24 This comment is acknowledged and does not relate to the adequacy of the Draft IS/MND or raise significant environmental issues.

North County Advocates

7668 El Camino Real, Suite 104-258, Carlsbad CA 92009

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

May 24, 2019

Dear Sirs:

I am writing on behalf of North County Advocates, a group of local citizen volunteers whose mission is to preserve and protect the environment of coastal North San Diego County. We are opposed to the proposal **TL6975** by SDG&E to place additional overhead power lines through San Elijo Hills in San Marcos to Escondido, particularly without an honest and complete EIR. **Please direct SDG&E to perform a full EIR to explore alternatives to TL6975**

Here is a short list of some of the negative impacts of the proposed power lines:

- Adding gigantic power poles and lines alongside of existing ones, some 30 to 50 feet CLOSER to homes is aesthetically objectionable.
- Wildfire risk is increased due to additional above ground power lines in an already Very High Fire Hazard area with limited evacuation routes. There have been wildfires in the area with loss of lives, homes and property.
- Declining property values and property taxes due to unsightly and dangerous power lines.
- More costly or cancelled homeowner's insurance policies
- Impacts on scenic and hiking trails – closures and more blight
- Noise – dynamite for blasting granite, helicopter stringing, heavy equipment, power lines buzzing close to bedrooms where children sleep
- Threats to endangered wildlife species in conservation areas (CNLM-Center for Natural Lands Management has conducted studies and will respond to the CPUC)

Alternatives:

1. Use an underground direct 5.4 mile route from substation to substation instead of overhead lines along a circuitous 12-plus mile route through sensitive communities and conservation areas. The City of San Marcos General Plan requires underground placement of power lines.
2. No additional power lines as proposed. Generate power through solar or other means at a location or locations that would use a different route.

SDG&E is already placing both new and existing power lines underground elsewhere in north county,. Its parent company, Sempra Energy, is a multi-billion dollar company building a huge LNG plant on the Texas gulf coast, taking in money from Saudi Arabia and elsewhere around the world. Certainly they can afford to place these power lines underground to protect and improve rather than degrade our precious and vulnerable natural environment.

Sincerely,



Howard Krausz
NCA President

Letter A10: North County Advocates

- A10-1 The North County Advocates' opposition to the Project is acknowledged. Master Response 4, CEQA Process, responds to the request to prepare an EIR and to consider alternatives to the Project.
- A10-2 Master Response 1, Aesthetics, addresses visual impacts of the Project, including cumulative impacts of the Project and past, present, and reasonably foreseeable future projects.
- A10-3 Master Response 2, Wildfire, responds to comments and concerns about the fire hazard in the Project area and evacuation routes.
- A10-4 Please see Master Response 5, Non-CEQA Issues.
- A10-5 Please see Master Response 5, Non-CEQA Issues.
- A10-6 Impacts on trails are addressed in Draft IS/MND Section 3.16, Recreation.
- A10-7 Noise impacts on trails are addressed in Draft IS/MND Section 3.13, Noise. Additionally, please see Master Response 3, EMF and Operational Noise.
- A10-8 Impacts on special-status species are addressed in Draft IS/MND Section 3.4, Biological Resources. Please also see Responses to Comments A5-1 through A5-3, which respond to comments from the Center for Natural Lands Management.
- A10-9 Master Response 4, CEQA Process, responds to the request to consider alternatives to the Project.

SAN DIEGO GAS & ELECTRIC (SDG&E) TIE LINE (TL) 6975 SAN MARCOS TO ESCONDIDO PROJECT – A.17-11-010
SDG&E Comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND)

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND	
2.0 Executive Summary/Project Description					
ES-2	Executive Summary	3 rd bullet	Global change - Describe poles as “dulled galvanized.” See text revision.	Construct a new single circuit power line approximately 2.8 miles in length on new dulled galvanized steel poles parallel to the existing Tie Line 13811/13825 within an existing 150-foot SDG&E ROW;	A11-1
ES-2	Executive Summary	4 th bullet	Segment goes through the City of San Marcos as well. Text revised.	Reconductor and re-energize approximately 7.4 miles of existing power line, as well as insulator replacement, in unincorporated San Diego County, San Marcos and Escondido;	A11-2
1-4	1.1	2 nd paragraph	Revise public review period to 60 days. See proposed changes.	On April 1, 2019, the CPUC filed a Notice of Completion (NOC) with the Governor’s Office of Planning and Research, State Clearinghouse, published a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration, and released this Draft IS/MND for a 45-day 60-day public review	A11-3
1-4	1.1	4 th paragraph	Revise close of public re view period to May 30, 2019. See proposed changes.	In accordance with Section 15105(b) of the CEQA Guidelines, the public review and comment period begins on April 1, 2019 and ends at 5 p.m. on May 15 30 , 2019.	A11-4
1-4	2.1.1	3 rd paragraph	Global change – The new powerline would be constructed <u>50</u> feet east of the centerline of the existing TL13811/TL3825 to maintain minimum clearance requirements as mandated by California General Order 95 and as stated in the project description submitted with our PTC application. Please make this change globally throughout the document.	Line 13811/13825 southeast to Meadowlark Junction along San Elijo Road. The new segment would be constructed parallel to, and approximately 30 50 feet east of, the centerline of the existing line. The new steel poles would be installed at the same spacing as the structures supporting the existing 138 kV power line. To accommodate the Project at Meadowlark Junction, an existing	A11-5
2-21	2.4.2	4 th paragraph	Add “transmission” and “adjacent to” to text. See revisions.	The distance from the ground to the lowest transmission conductor would be at least 30 feet. The distance between the conductors on each pole would be approximately 9 feet. The span lengths for the Project are expected to be the same as those currently existing along the entire Project alignment. The pole replacements and new pole placements in Segments 1 and 2, respectively, would be located at adjacent to or parallel to existing poles.	A11-6
2-22	2.4.2	4 th paragraph	Clarifications added to text. See proposed changes.	In Segment 1, all existing porcelain insulators would be replaced with polymer insulators and Tie Line 680C, which would be collocated with the Project, would be reconducted with aluminum-clad steel reinforced supported wire. Within Segment 3, the existing de-energized conductor and porcelain insulators on the north side of the towers would be removed and replaced with polymer insulators and new conductors. The existing conductors in Segment 3 approximately one (1) mile from Escondido Substation to Escondido Substation would remain in place.	A11-7
3.3 Air Quality					
3.3-2 – 3.3-3	3.3.1	Third paragraph down	Given the recent California Supreme Court decision on December 24, 2018 regarding Friant Ranch, it is recommended that additional text be added under the description of each of the criteria pollutants to further describe their potential health effects. Clarification will not affect impact discussion.	N/A	A11-8

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND	
3.3-3	3.3.1	Last paragraph	It is recommended that the text indicate which criteria pollutants are monitored by the stations, as not all of the criteria pollutants have data available from the monitoring stations. Clarification will not affect impact discussion.	N/A	A11-9
3.3-4	3.3.1	Table 3.3-1	The table excludes certain criteria pollutants (e.g., SO ₂ , lead). It is recommended that these criteria pollutants be added or a footnote be inserted that explains why some of the pollutants were excluded from the table. Clarification will not affect impact discussion.	N/A	A11-10
3.3-4	3.3.1	Table 3.2-1	In response to the court decision on Friant Ranch, it is recommended that a footnote be added to describe what the exceedance of the NAAQS for ozone means in terms of potential health risks. Footnote will not affect impact discussion.	N/A	A11-11
3.3-7	3.3.2	Table 3.3-3	While Table 3.3-3 presents the CAAQS and NAAQS for each of the criteria pollutants, it should also report the form of the standards in the footnotes as well.	N/A	A11-12
3.3-11	3.3.4	Last paragraph	In response to the court decision on Friant Ranch, it is recommended that a brief discussion be added that relates the regional mass emissions impact finding to ambient air quality and public health. The discussion should explain the nexus between the regional pollutant thresholds and the CAAQS and NAAQS, which protect human health, and indicate that emissions not exceeding the regional thresholds are also considered to not adversely affect air quality such that the CAAQS or NAAQS would be violated and thus would not contribute to significant human health impacts. Clarification will not affect impact discussion.	N/A	A11-13
3.4 Biological Resources					
3.4-3	3.4.1	Table 3.4-1	Footnote b: Table 3.4-1 does not have Holland or Oberbauer codes, therefore, the reference is not necessary.	N/A	A11-14
3.4-9	3.4.1	Second paragraph	Table 3.4-2 is referenced in a statement regarding 37 special-status wildlife species known to potentially occur in the BSA. However, 26 wildlife species are listed in Table 3.4-2. In addition, the PEA documented 26 special-status wildlife species with the potential to occur. It would be important for us to review the 37 special-status wildlife species being referred to in the Draft IS/MND. Please clarify.	N/A	A11-15

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND	
3.4-13	3.4.1	Last paragraph	The Draft IS/MND states that 35 special-status plant species were analyzed in the PEA. However, Table 3.4-3 of the IS/MND only included 18 special-status plant species, and appears to be missing 17 species that were analyzed in the PEA. It appears that the first page of Table 3.4-3 was not included in the IS/MND document that we reviewed.	N/A	A11-16
3.4-30	3.4.2	Last sentence second paragraph and second paragraph	See proposed revisions to text.	<p>SDG&E intends to utilize mitigation credits authorized under the 2017 HCP ITP to mitigate for impacts on sensitive habitats for the Project. SDG&E also proposes to utilize take coverage or modification of habitat under the 2017 HCP.</p> <p>The Project is located within the area where SDG&E’s utility operations are governed by the NCCP. SDG&E has indicated that it would seek incidental take coverage for temporary and permanent impacts to natural habitat resulting from construction of the Project through the NCCP and may rely on the mitigation bank associated with the NCCP to fulfill the mitigation requirements for those impacts (ICF, 2017a). SDG&E proposes to authorize take under the 2017 HCP. For operation and maintenance of the Project, SDG&E would implement the NCCP and the 2017 HCP to comply with the FESA and CESA (SDG&E, 1995; ICF, 2017a).</p>	A11-17
3.4-33	3.4.4	Last paragraph, last line	<p>SDG&E has provided clarification for <u>MM BIO-1: Project Compliance with the Federal and California Endangered Species Acts</u> and would like the CPUC to consider placing the text of MM BIO-1 within only two applicable sections: Special-Status Plant Species and Special-Status Avian Species and Other Nesting Avian Species sections. There are no listed invertebrates, amphibians, reptiles, or mammals with potential to occur on site. We would request that the MM BIO-1 language be removed from the following sections:</p> <ul style="list-style-type: none">• Special-Status Invertebrate and Amphibian Species• Special-Status Reptile Species• Special-Status Mammal Species	N/A	A11-18
3.4-36	3.4.4	Middle of second paragraph	SDG&E provides an annual report with the accounting of mitigation credits and modification of habitat for each year. In addition, an estimate for future projects committed to using the NCCP and 2017 HCP or LEHCP is included in the reported total. The remaining mitigation credits reported in the 2018 SDG&E Annual Report are approximately 169.076 acres, and the San Marcos to Escondido TL6975 Project (Project) will utilize approximately 1.9 acres in mitigation credits of the remaining total. In regards to the modification of habitat for the 2017 HCP reported in the 2018 Annual Report, an estimated total of 55.092 acres of the initial 60 acres remain. The Project will utilize approximately 2.14 acres of the remaining total for impacts from the modification of habitat. Please see revised text.	<p>As noted in the discussion of the NCCP in Section 3.4.2, Regulatory Setting, in approving the NCCP and 2017 HCP, USFWS and CDFW determined that implementation of avoidance and minimization measures and Operational Protocols would avoid or reduce potential impacts on listed and special-status plant and wildlife species and provide appropriate mitigation where impacts occur. However, there are currently no assurances that sufficient take or mitigation credits provided under the NCCP would be available at the time Project construction would commence or if additional take authorization would be required by the wildlife agencies. If the take of listed species goes beyond the available take authorized under the NCCP, this additional take and/or adverse modification of habitat could result in a significant impact beyond what is covered under the NCCP. Therefore, in the event that there are not sufficient take or mitigation credits provided under the NCCP at the time of Project construction, Mitigation Measure BIO-1 is proposed to avoid and reduce impacts. Implementation of this mitigation measure would ensure that the Project would comply with all regulatory requirements addressing special-status plant species, reducing this impact to less than significant.</p>	A11-19

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND	
3.4-36	3.4.4	Fourth paragraph	SDG&E provides an annual report with the accounting of mitigation credits and modification of habitat for each year. In addition, an estimate for future projects committed to using the NCCP and 2017 HCP or LEHCP is included in the reported total. The remaining mitigation credits reported in the 2018 Annual Report are approximately 169.076 acres and the San Marcos to Escondido TL6975 Project (Project) will utilize approximately 1.9 acres in mitigation credits of the remaining total. In regards to the modification of habitat for the 2017 HCP reported in the 2018 Annual Report, an estimated total of 55.092 acres of the initial 60 acres remain. The Project will utilize approximately 2.14 acres of the remaining total for impacts from the modification of habitat. Please see revised text.	There is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP at the time of construction to address impacts on federal and State listed sensitive plant species. With implementation of Mitigation Measure BIO-1, compliance with the requirements of the 1995 NCCP and the 2017 HCP, or with equally or more effective conditions imposed by new authorizations, would be required. Therefore, impacts on the special-status plant species attributable to the Project would be reduced to less than significant.	A11-20
3.4-47	3.4.4	Last paragraph	We have added minor clarifying language to the MM BIO-3 for the CPUC’s consideration. SDG&E’s typically places silt fencing at the edge of work areas when they are within approximately 25 feet of a jurisdictional feature. As currently written, MM BIO-3 could be interpreted multiple ways. We feel this revision (see underlined text at right) would facilitate clear communication and efficient implementation of the measure during construction.	Additionally, <u>when clearing or grading occurs within 25 feet of a jurisdictional feature</u> , silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated...	A11-21
3.5 Cultural Resources					
3.5-4	3.5.1	First paragraph	The nearest mission is Mission San Luis Rey founded in 1798 by Fr. Fermin Lasuen. See revised text.	Mission San Diego de Alcalá, founded in 1769 by Father Junipero Serra <u>Mission San Luis Rey, founded in 1798 by Fr. Fermin Lasuen</u>	A11-22
3.5.4	3.5-33	2 nd paragraph	Request clarification that the Qualified Archaeologist need not “carry out” all APMs and MMs directly.	MM CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior’s Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&E. The Qualified Archaeologist, or a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall to carry out all APMs and mitigation measures related to archaeological resources.	A11-23
3.8 Greenhouse Gas Emissions					
3.8-9	3.8.4	2 nd paragraph	The text refers to a screening threshold of 900 metric tons CO ₂ e per year recommended by the County of San Diego. However, this screening threshold is considered to be outdated and is no longer recommended by the County, and documentation of this threshold has been removed from the County’s website. A 10,000 MT CO ₂ e per year threshold is used by other California air.	N/A	A11-24

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND	
3.8-9	3.8.4	3 rd paragraph	Similar to the comment above, the use of a 20-year period to amortize the project’s construction emissions is no longer recommended by the County, and documentation of this amortization period has been removed from the County’s website. Amortization of construction emissions over a 30-year period is recommended by the South Coast Air Quality Management District (SCAQMD).	N/A	A11-25
3.13 Noise					
3.13	3.13-6	1 st paragraph	Vehicular traffic noise was measured to be as high as 68.7 dBA L _{eq} . – Change this sentence to read “Existing ambient noise levels were measured to be as high as 68.7 dBA Leq”	N/A	A11-26
3.13	3.13-27	Operations discussion	The 75 dBA Leq threshold is derived from the municipal codes and is applicable to construction. It should not be used for operations, while the project will most likely not cause an impact to any municipalities threshold with respect to operation, this threshold needs to reflect the applicable municipality thresholds.	N/A	A11-27
3.13	3.13-27	Table 3.13-14	Please include the 25-foot reference distance from the FTA manual.	N/A	A11-28
3.17 Transportation and Traffic					
3.17-1	3.17	First paragraph	The OPR FAQ cited here says Jan 1, 2020, but the adopted text of the Guidelines states it will be applied statewide on July 1, 2020 (section 15064.3(c)).	N/A	A11-29
3.17-1	3.17	Second paragraph	For the study area for the traffic and transportation analysis, are the staging areas included? They are not in the defined study area for each segment.	N/A	A11-30
3.17-2	3.17.1	First paragraph (roadway network)	Text says “no components or work would occur within roadways maintained by these cities”, but traffic related to worker commuting/delivery to staging yards would occur in these cities’ jurisdictions.	N/A	A11-31
3.17-16	3.17.4	Third paragraph (question e.)	Text states “construction within public roadways would be conducted pursuant to Caltrans; MUTCD requirements”. Because no work would occur within Caltrans ROW, would the MUTCD apply? Not consistent with what is described in Reg Setting 3.17.2.	N/A	A11-32
3.20 Wildfire					

MND Page #	MND Section #	MND Line or Table #	Comment	Redline or Strikeout Text in Draft IS/MND
3.20-6	3.20.2	Entire Section	The Agencies having Jurisdiction (listed in the measure) will be contacted and consulted in the development of the Project Specific Construction Fire Prevention Plan. Post construction, SDG&E and its contractors follow Electric Standard Practice 113.1 SDG&E OPERATIONS AND MAINTENANCE WILDLAND FIRE PREVENTION PLAN. This plan is analyzed and updated annually to enhance SDG&E’s ability to prevent ignitions from construction and maintenance activities throughout the SDG&E Service Territory.	N/A
Appendix A: Mapbook				
13		Seg 2	Please ensure symbols in the legend accurately depict the proposed structures. Direct buried structures should just be depicted as a brown dot. There are a few instances where the brown dot contains a green circle, which makes them look like new pier foundations.	N/A

Letter A11: San Diego Gas & Electric Company

- A11-1 The suggested clarification has been made in the Draft IS/MND Executive Summary and Section 3.1, Aesthetics. All other mentions of new steel poles in the Draft IS/MND are understood to be dulled galvanized steel as described in Draft IS/MND Chapter 2, Project Description, Section 2.4, *Project Components*.
- A11-2 The suggest clarification has been made in the Draft IS/MND Executive Summary.
- A11-3 The extension of the comment period by an additional 15 days is described in Final IS/MND Section 1.1, CEQA Process. No revision to the Draft IS/MND is necessary.
- A11-4 The extension of the comment period by an additional 15 days is described in Final IS/MND Section 1.1, CEQA Process. No revision to the Draft IS/MND is necessary.
- A11-5 On July 9th, 2019, in response to Data Request #9, SDG&E confirmed that the offset between the proposed TL6975 alignment and the existing TL13811/13825 alignment in Segment 2 would be 50 feet from centerline to centerline. Consequently, all Draft IS/MND mentions of an offset of 30 feet between the existing TL13811/TL13825 and the proposed TL6975 power line have been revised to clarify that the correct number is 50 feet. The CPUC has determined that the change in distance would not result in any new potentially significant impacts and has been revised accordingly in Section 3.5, Cultural Resources and Section 3.20, Wildfire. For additional discussion related to this clarification and any effect to the environmental analyses presented in the Draft IS/MND, please see Response to Comment I3-26.
- A11-6 The suggest clarification has been made in Chapter 2 of the Draft IS/MND.
- A11-7 The suggest clarification has been made in Chapter 2 of the Draft IS/MND.
- A11-8 Additional informational text about human health effects has been provided under the description of ozone in Draft IS/MND Section 3.3, Air Quality. The discussion of the other criteria pollutants in the Draft IS/MND includes relevant information about human health effects.
- A11-9 Table 3.3-2, to which the text in question refers, clearly indicates which station provided the monitoring data for each criteria pollutant. No change has been made to the text.
- A11-10 For informational purposes, the following rows have been added to Table 3.3-1, describing the attainment status for the additional criteria pollutants discussed in Draft IS/MND Section 3.3.1 (i.e., sulfur dioxide and lead). This information is derived from the same source cited in the table and reviewed during preparation of the Draft IS/MND and the revision does not affect the impact analysis.

<u>Sulfur Dioxide</u>	<u>Attainment</u>	<u>Attainment</u>
<u>Lead</u>	<u>Attainment</u>	<u>Attainment</u>

A11-11 Additional informational text about human health effects has been provided under the description of ozone in Draft IS/MND Section 3.3, Air Quality.

A11-12 The requested change would not affect the analysis and is not needed to inform the summary of attainment status that is used as the basis for the analysis. Therefore, no revision has been made.

A11-13 Clarification regarding the connection between emissions and localized health impacts to address the Supreme Court's decision in *Sierra Club v. County of Fresno (Friant Ranch, L.P.)* (2018) 6 Cal.5th 502, has been added to the Question a impact discussion on IS/MND page 3.3-10 and 3.3-11.

A11-14 Footnote b in Table 3.4-1 has been revised to remove reference to "codes" (i.e., alphanumeric codes) from Oberbauer, as no such codes were included in the table in the Draft IS/MND. Alphanumeric Oberbauer codes may be found in the Biological Resources Technical Report in Draft IS/MND Appendix D.2.

A11-15 The text on Draft IS/MND page 3.4-9 inadvertently referred to a greater number of special-status wildlife species than are known to potentially occur in the Biological Study Area (BSA) by including species considered in the analysis, but unlikely to occur (as also described on Draft IS/MND page 3.4-9). The text has been revised to clarify that only 26 special-status wildlife species are known to potentially occur in the BSA, consistent with information presented in Table 3.4-2.

A11-16 The following rows have been added to Draft IS/MND Table 3.4-3 to reflect the information provided in Draft IS/MND Appendix D.2. Only species with some potential to occur are listed in Table 3.4-3; species considered not present are not listed.

Species Name	<u>Covered under the NCCP^a</u> (Yes/No)	<u>Listing Status^b</u>	<u>Habitat Requirements</u>	<u>Potential to Occur</u>
<u>San Diego thorn-mint</u> (<i>Acanthomintha ilicifolia</i>)	Yes	<u>FT, SE, 1B.1</u>	Annual herb. Prefers friable or broken clay soils in grassy openings in chaparral and coastal sage scrub, valley and foothill grassland, and vernal pools; 33–3,150 feet (ft). Blooming period: April–June	<u>Suitable friable clay soils are very limited within the survey area. If present on-site this species would have been observed.</u> <u>Low potential.</u>
<u>California Adolphia</u> (<i>Adolphia californica</i>)	No	<u>2B.1</u>	Deciduous shrub. Clay soils in chaparral, coastal scrub, and valley and foothill grassland; 147–2,428 ft. Blooming period: December–May	<u>Approximately 87 individuals were detected in the northwestern portion of the survey area.</u> <u>Present.</u>
<u>San Diego sagewort</u> (<i>Artemisia palmeri</i>)	No	<u>4.2</u>	Deciduous shrub. Sandy soils in mesic areas in chaparral, coastal scrub, riparian forest, riparian scrub, riparian woodland; 49–3,002 ft. Blooming period: February–September	<u>Approximately 65 individuals were detected in the eastern portion of the survey area.</u> <u>Present.</u>

Species Name	<u>Covered under the NCCP^a (Yes/No)</u>	<u>Listing Status^b</u>	<u>Habitat Requirements</u>	<u>Potential to Occur</u>
<u>Encinitas baccharis</u> (<u>Baccharis</u> <u>vanessae</u>)	<u>Yes</u>	<u>FT, SE, 1B.1</u>	<u>Deciduous shrub. Sandstone in maritime chaparral and cismontane woodland; 196- 2362 ft. Blooming period: August - November</u>	<u>Perennial subshrub which would have been detected during rare plant surveys if it were present.</u> <u>Low potential.</u>
<u>San Diego sunflower</u> (<u>Bahiopsis</u> <u>[=Viguiera] laciniata</u>)	<u>No</u>	<u>4.2</u>	<u>Perennial shrub. Coastal sage scrub and chaparral; 295–2,460 ft. Blooming period: February–August.</u>	<u>One individual detected in northwestern portion of PSA.</u> <u>Present.</u>

A11-17 Based on information submitted by SDG&E in response to CPUC Data Request #11, SDG&E can utilize take coverage or modification of habitat under its 2017 Low Effect Habitat Conservation Plan. The suggested clarification has been made.

A11-18 The CPUC agrees that the special-status reptiles present or with potential to occur in the BSA all are either California Species of Special Concern or CDFW Watch List species (see Draft IS/MND Table 3.4-2, page 3.4-10). As such, they are not subject to take restrictions under either the federal Endangered Species Act or California Endangered Species Act, and so the availability of take credits available under the NCCP is not relevant to these species. The same is true of the special-status mammal species (see Draft IS/MND Table 3.4-2, pages 3.4-12 and 3.4-13). Therefore, the text has been revised to clarify that Mitigation Measure BIO-1 is not applicable to special-status reptiles and special-status mammal species (this measure was not applied to special-status invertebrate and amphibian species in the Draft IS/MND) and that application of NCCP Operational Protocols as committed to in APM BIO-1 would reduce impacts on these species to less than significant.

A11-19 In response to CPUC's Data Request #11, on September 30, 2019, SDG&E submitted its most recent SDG&E Low-Effect Habitat Conservation Plan 2018 Summary Report. According to this annual report, SDG&E would have approximately 169 acres of mitigation credit available as of August, 2019 (SDG&E 2019a, SDG&E 2019b). The text of Section 3.4, Biological Resources, has been revised accordingly and included in Chapter 3 of this Final IS/MND.

A11-20 See Response to Comment A11-19.

A11-21 The suggested clarification of Mitigation Measure BIO-3 is consistent with the impact analysis and intent of the measure; therefore, Mitigation Measure BIO-3 has been revised as requested.

A11-22 The suggested revision has been made.

A11-23 The suggested clarification has been made.

A11-24 This comment and Comment A11-25 are acknowledged. It appears that the County no longer recommends a specific GHG significance threshold or amortization period due to an opinion filed on September 28, 2018, with the Fourth District Court of Appeal (Div. 1) affirming a trial court's decision to invalidate San Diego County's adoption of a 2016 Guidance Document that established a threshold of significance for GHG emissions analysis of 4.9 MT of CO₂e per service population per year (Golden Door Properties, LLC v. County of San Diego/Sierra Club, LLC v. County of San Diego, 2018). The IS/MND does not use the 4.9 MT threshold or the 2016 Guidance Document for justification for the 900 MT threshold or 20-year amortization period used in the GHG analysis. The 900 MT threshold and 20-year amortization period were previously recommended by the County (County of San Diego, 2015) prior to its adoption of the 2016 Guidance Document. The 900 MT threshold relies on a screening threshold published by the California Air Pollution Control Officers Association (CAPCOA) to determine the need for additional analysis and mitigation for GHG related impacts under CEQA (see CAPCOA white paper at: <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>). Clarification has been added to IS/MND Section 3.8.4 to acknowledge that the 900 MT CO₂e significance threshold is a CAPCOA screening threshold no longer formally recommended by the County of San Diego; however, in the absence of a locally adopted GHG significance threshold or amortization period, the CPUC finds, for purposes of this Project, use of the CAPCOA screening threshold and the 20-year amortization period to be adequate for a conservative assessment of the significance of Project GHG emissions.

In addition, as shown in Draft IS/MND Table 3.8-3, the Project's amortized annual emissions – even over a more conservative 20-year period – are an order of magnitude below the 900 MT CO₂e per year threshold used in the analysis, and no mitigation is required for this less-than-significant impact. Therefore, the use of a longer amortization period and/or a higher annual threshold in this document would not affect the significance conclusions for greenhouse gas emissions in the Draft IS/MND.

A11-25 See Response to Comment A11-24.

A11-26 The suggested revision has been made.

A11-27 The use of the 1-hour average 75 dBA Leq threshold was intended to apply to periodic maintenance activities (e.g., intrusive inspection and/or repairs) that would have short-term effects similar to construction activities. The text on Draft IS/MND page 3.13-27 has been revised to clarify that this threshold is not applicable to long-term operational noise.

A11-28 The suggested revision has been made.

A11-29 The text in Section 3.17, Transportation and Traffic, has been revised to clarify that statewide application of CEQA Guidelines Section 15064.3 is not required until July 1, 2020, consistent with adopted Guidelines Section 15064.3(c).

- A11-30 Text has been revised to clarify that staging yards were included in the study area. Please see analysis under Question a on Draft IS/MND page 3.17-13 which indicates that trips accessing staging yards were considered. As shown in Draft IS/MND Figure 2-11, Staging Areas, the staging areas that would generate the majority of worker commute trips and delivery trips are located along the roadways listed in Table 3.17-1 and analyzed in Section 3.17 (e.g., Palomar Airport Road, Auto Park Way, San Elijo Road, Harmony Grove Road). The two auxiliary staging areas (Kearny and Icon 3PL Materials Yard) would only be used to receive and store materials until shipped to the Project area and would not generate worker trips or delivery trips not already addressed in the analysis.
- A11-31 Although some traffic related to worker commuting and delivery to staging yards would occur in the jurisdictions of Vista and Carlsbad, the sentence cited in the comment correctly indicates that no project components or active work would occur within roadways maintained by either jurisdiction.
- A11-32 As the Project would not occur within a Caltrans ROW, compliance with the MUTCD would not be required. Text has been revised to clarify that all construction within public roadways would be conducted pursuant to applicable APMs.
- A11-33 This comment is acknowledged. Master Response 2, Wildfire, further describes the post-construction operational approach to fire prevention and suppression (which is not Project-specific).
- A11-34 In response to this comment, the CPUC transmitted Data Request #11 to SDG&E requesting these revisions to Appendix A route maps. The revised set of route maps were received on September 20, 2019, and are provided in Appendix A.2 of this Final IS/MND.



Business Services
255 Pico Avenue, Suite 250
San Marcos, CA 92069

T 760.752.1299
F 760.471.4928
www.smusd.org

May 29, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

Re: San Diego Gas and Electric San Marcos to Escondido Tie Line 6975 69kV Project

To Whom It May Concern:

This letter is to serve as the comments from San Marcos Unified School District (District) on the draft Mitigated Negative Declaration dated April 2019 (MND) for the proposed San Diego Gas and Electric (SDGE) San Marcos to Escondido tie Line (TL) 6975 69kV Project (Project). It is our understanding that there will be three segments of construction planned of over 12 miles which falls in the San Marcos Unified School District boundary. Information contained in this letter is accurate as of the date of this letter, but is subject to change. Additionally, this information provided is in response to specific information in the MND and does not represent an opinion of the District for approval or disapproval of the Project. This letter is based on current, known facts and information supplied to the District, and any changes to those facts and information may change the District's response.

The Project requires approvals, permits, and consultation from federal, state, and local agencies. The District requests to be on the agency list for purpose of consultation. (MND Table ES-1)

The following schools are located within 1 mile of the footprint of Project components including all areas of temporary and permanent ground disturbance, as well as Project staging areas.

School	Grade Level	Distance (miles)	Enrollment
Discovery Elementary	K-5	.25	572
Carillo Elementary	6-8	.75	888
Double Peak K-8	K-8	.70	1,295
San Elijo Elementary	K-5	.22	785
San Elijo Middle	6-8	.22	1,829
San Marcos High	9-12	.00	3,360
Total Students			8,729

The following are comments that we believe are environmental impacts that could potentially affect our students, faculty, and the District and warrant further evaluation by the authorities.

Governing Board: Stacy Carlson

Victor Graham

Sydney Kerr

Janet McClean

Pam Lindamood

Carmen García, Ed.D., Superintendent

In regards to the California Department of Education Title V regulations Article 2. School Sites 14010 Standard for School Site Selection state that power lines are to be as follows:

c. The Property line of the site even if it is a joint use agreement as described in subsection (o) of this section shall be at least the following distance from the edge of respective power line easements:

1. 100 feet for 50-133 kV line.
2. 150 feet for 220-230 kV line.
3. 350 feet for 500-550 kV line.

A12-1

Because of the increase variance of the power kV lines, we request SDGE to set up a protocol to adequately address parental concerns by setting up a customer service phone number before, during, and after construction. The District would also like confirmation this increase will not impact the health and safety of our students, staff, and community.

Aesthetic

The existing school site of San Marcos High School lies in segment 1. The San Marcos High school built in 1961 has recently undergone extensive site improvements in 2013 of \$172 million. The reconstruction updated the school to today's code and education specifications and included expansion for future enrollment growth. The San Marcos High School design was awarded the 2015 AGC Build San Diego Public Work Award, the 2014 ABD Excellence in Construction Project of the Year, and the 2014 ABD Excellence in Institutional Project Award, as well as the prestigious Leroy F. Green Design Award.

The visual aesthetics from the taller poles and additional power lines could be intimidating to our students. There is also the perception that more power lines equal higher wattage, and because of this, parents may not want their children to attend our school for health concerns. The potential reduction in student attendance would result in a loss of revenue for the District.

A12-2

A12-3

Because of the aesthetics to the San Marcos High School being significantly impacted by the power lines, we are asking for the power lines to go underground. We respectfully request that the utmost due diligence be conducted to preserve the sanctity of the school aesthetics. We suggest a cost analysis be performed to include a comparison of underground verses above ground installation. We understand that there are existing underground conduits running along the frontage of the site and along San Marcos Boulevard. We also are encouraged by the understanding that the cost of underground installation today will result in less costs in the future.

A12-4

Right of Way

Right of Way requirements to construct the direct bury or foundation poles will affect the legal parcel of our San Marcos High School property by approximately an additional 10 feet if not more. We request further analysis to examine the infringement to the San Marcos High School property. We are open to certain areas in our landscape but our synthetic track, baseball and softball fields, appear to be in the ROW zone, and this requires further analysis. All areas disturbed or destroyed by construction will need to be returned to prior condition.

A12-5

Traffic and Transportation

The proposed Project areas appear to disrupt traffic and walk routes by closing lanes and removing sidewalk access as the project lines the school site along the sidewalk at San Marcos Boulevard. The City of San Marcos collaborates with the District and other entities to ensure a commitment to the Safe Routes to School Program, sponsored by the US Department of Transportation. Safe alternative routes will need to be studied and mapped for student, parent, and faculty access with both the City of San Marcos and the District.

A12-6

We ask that the planning of construction take in consideration the school activities and align with our school calendar. Hours of construction should not be during pick up or drop off times or during major school events. Construction personnel are not to interact with students and or faculty. Plans for sidewalk closures and alternative walking routes should be approved in advanced by the District to ensure student, faculty, and community safety. We recommend pre-construction meetings with the District be required between SDGE and the San Marcos Unified School District Facilities and Planning Department. The San Marcos Unified School District should be placed on the agency list for purpose of consultation on the SDGE San Marcos to Escondido Tie Line 6975 69kV Project. A school calendar is available on the District's website www.smusd.org for reference.

A12-7

Discovery Elementary School is located near the starting point of segment 1. The District is currently working with the City of San Marcos on future street closures around the school, anticipated for fall 2019 and early 2020. We request that the Project coordinate these current plans to lessen the impacts on the students and faculty of the school.

Remaining schools of Carillo Elementary, Double Peak School, San Elijo Elementary, San Elijo Middle are within the resource specific study areas and should be properly notified in advance of any disruption of power and traffic/transportation.

A12-8

The District looks forward to working with San Diego Gas & Electric on the Project in the future.

Regards,

Mark A. Schiel
Assistant Superintendent
Business Services

TC/km

Letter A12: San Marcos Unified School District

- A12-1 The CPUC acknowledges the District's concerns regarding student, parent, teacher, and staff health and safety. The Project would not increase the voltage of the existing power line along San Marcos Boulevard that passes San Marcos High School. As described in Draft IS/MND Table 2-1 on page 2-3, the Project would rebuild the existing TL 680C 69 kV circuit and add TL 6975 to create a double 69 kV circuit. The cited section of California Department of Education regulations (5 Cal. Code Regs. Section 14010) governs site selection for school campuses and does not identify an environmental impact of the Project; however, CPUC acknowledges the proximity of existing TL 680C and the proposed additional TL 6975 circuit to San Marcos High School. With regard to the request to establish a permanent customer service phone number, this comment does not identify any effects to the physical environment that would be subject to analysis under CEQA and that would be addressed by this request. As applicable under CEQA, health- and safety-related impacts of the Project are described throughout the Draft IS/MND, and no significant impacts have been identified.
- A12-2 The District's concerns regarding aesthetics are acknowledged. Please see Master Response 1, Aesthetics.
- A12-3 No adverse health impacts from the Project have been identified. Please see Master Response 3, EMF and Operational Noise, as well as Final IS/MND Appendix C, which provides SDG&E's Magnetic Field Management Plan. In Segment 1, the increased height of the poles is one of the low-cost or no-cost measures to reduce potential exposures of people to the power lines' extremely low-frequency electric and magnetic fields (EMF). Regarding economic impacts on the District, please see Master Response 5, Non-CEQA Issues.
- A12-4 Regarding the consideration of alternatives, please see Master Response 4, CEQA Process.
- A12-5 As described in the Draft IS/MND, the additional ROW required along the frontage of San Marcos High School consists of 5 feet of width on either side of the existing 10-foot-wide ROW. No land use changes within the additional 5 feet that is between the existing ROW and the high school are anticipated. As described in detail on Draft IS/MND page 2-53, all areas temporarily disturbed by Project activities would be restored to pre-construction conditions, consistent with firebreak requirements.
- A12-6 All pole replacements and distribution trenching proposed along West San Marcos Boulevard in front of San Marcos High School would be required to take place during nighttime or weekend hours due to the need for lane closures. Therefore, it is not anticipated that construction would disrupt traffic or walk routes during school hours. However, APM TRA-1, described on Draft IS/MND page 2-61, would require SDG&E to establish a traffic control plan to maintain a safe transportation corridor (for all modes of travel) during construction.

- A12-7 APM TRA-1 would require SDG&E to establish a traffic control plan to maintain a safe transportation corridor during construction. Additionally, all pole replacements and distribution trenching proposed along West San Marcos Boulevard in front of San Marcos High School would be required to take place during nighttime or weekend hours due to the need for lane closures. No physical environmental impact has been identified that would require further restricting construction with respect to the school district's calendar as a CEQA mitigation measure.
- A12-8 The proximity of these schools is acknowledged, and would be notified per SDG&E's public notification requirements in APMs PS-1 and NOI-1 on Draft IS/MND pages 2-60 and 2-61, respectively.

From: [Destiny Colacho](#)
To: [TL6975SanMarcos](#)
Cc: [Deneen Pelton](#)
Subject: CPUC SDG&E San Marcos to Escondido Tie Line 6975 69kV Project
Date: Friday, May 3, 2019 7:19:24 AM

Dear Mr. Davis,

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for providing us with the Notice of Intent and Draft IS/MND for the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon's specific area of Historic interest and ties.

We have reviewed the provided information and are in agreement with most of the recommended mitigation measures which include archaeological and Native American monitoring, cultural sensitivity training, a monitoring treatment plan, data recovery excavations at P-37-032160, exclusionary fencing, pre-construction surveys, road maintenance within archaeological sites, and inadvertent discovery of human remains.

However, under MM Cul-4: Data Recovery Excavations at P-37-032160 it states that "the research design shall be submitted to SDG&E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E, and submitted to San Luis Rey Band of Mission Indians for review and comments".

We request that both documents, the research design and data recovery report, also be provided to the Rincon Band for review and comment and that the language in the mitigation measures be revised to reflect this request. The Rincon Band, a Federally Recognized Band and Tribal Historic Preservation Office, has direct cultural ties and knowledge pertaining to Traditional Cultural Places in the San Marcos and Escondido area and therefore request to participate in review and comment of all documents pertaining to cultural resources associated with this project, as well as all monitoring activities to ensure that decisions are being made in accordance with Rincon's beliefs and traditional practices. We request that the mitigation language be revised to reflect this request pertaining to monitoring.

If you have additional questions or concerns please do not hesitate to contact our office at your convenience at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

A13-1

Destiny Colocho, RPA

Cultural Resource Manager and Tribal Historic Preservation Officer

Cultural Resource Department

Rincon Band of Luiseño Indians

1 West Tribal Road | Valley Center, CA 92082

Office: 760-297-2635 | Cell: 760-705-7171

Fax: 760-692-1498

Email: dcolocho@rincon-nsn.gov

cid:image001.jpg@01D30C3F.37000EE0



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Letter A13: Rincon Band of Luiseño Indians

A13-1 The CPUC acknowledges the Territory of the Luiseño people, as well as Rincon's specific area of Historic interest and ties. Mitigation Measure CUL-4 has been revised to include the Rincon Band for review and comment of the research design and data recovery report of the Project.



SAN MARCOS
DISCOVER LIFE'S POSSIBILITIES

Office of Mayor Pro Tem Sharon Jenkins
sjenkins@san-marcos.net

May 30, 2019

California Public Utilities Commission

Attn: San Marcos-Escondido TL6975

c/o David D. Davis, AICP

Environmental Science Associates

1425 N. McDowell Blvd., Ste. 200

Petaluma, CA 94954

To Whom It May Concern,

As a San Marcos resident since 1971 and an elected Councilmember since 2012 I am writing to express my concern about the TL6975 project.

At our recent 5/14/19 City Council meeting we unanimously voted to request the CPUC require SDGE to do a complete EIR on this project since one had not previously been completed. The aesthetics and possible risk to fire needs to be better evaluated.

As a longtime resident of San Marcos my family has experienced fires that affected San Marcos in 1996 (Harmony Grove) and 1998 and 2014 (Cocos). We also indirectly experienced the 2007 Witch Fire that devastated many areas within San Diego County. During these fires people put their lives on hold, schools and even universities are closed, employers close their businesses, children can't participate in sports outside and in some cases you stay awake to see if the flames are going to crest over the hill and force you to evacuate.

Please insist that SDGE complete a full EIR so that other areas of our community do not risk the hazard of fires due to above ground power lines.

Sincerely,

Sharon Jenkins

Mayor Pro Tem

A14-1

A14-2

www.san-marcos.net

CITY OF SAN MARCOS, CALIFORNIA

1 Civic Center Drive | San Marcos, CA 92069 | (760) 744-1050

Letter A14: City of San Marcos, Sharon Jenkins, Mayor Pro Tem

A14-1 The CPUC acknowledges your request for an EIR and concerns regarding aesthetics and wildfire. Please see Master Responses 4, CEQA Process; 1, Aesthetics; and 2, Wildfire.

A14-2 The CPUC acknowledges your request for an EIR and concerns regarding wildfire. Please see Master Responses mentioned above in A14-1.



Office of Council Member Randy Walton
rwalton@san-marcos.net

May 22, 2019

Re: Opposition to CPUC/SDG&E San Marcos to Escondido TL6975 69kV Project

Dear CPUC:

This letter is written to express my strongest opposition to the proposed project to connect substations in Escondido and San Marcos (TL6975 69kV Project). This opinion represents not only my own opinion, but also the opinion of the vast majority of the people I serve in the City of San Marcos, California as member of the city council. In short, this proposed project unfairly burdens the residents of San Marcos.

The aesthetic harm to neighborhoods is unjust. I would highly recommend that decision makers drive the neighborhoods of San Marcos that will be impacted by the proposed project. For hundreds of homes, they already must deal with large imposing metal power structures perilously close to their homes, structures that for many were constructed after they purchased. Imagine being told that a second large metal power line will be installed next to the existing structures, which doubles the eyesore and the noise.

The fire dangers are real. Public utilities around the state have been hammered by jury verdicts for destructive fires caused by power lines. Considering the times in which we are living, and the general agreement that fire danger will get worse in the coming decades, not better, we should, when possible, be putting power lines underground where they can't cause fire. The proposed route hugs hundreds of homes in a way that presses the additional power lines and power poles up against existing homes, with large swaths of native brushland on the other side. Not only are they unsightly, but they increase an already real fire danger.

Families are at risk of losing insurance. Adding power lines (and/or beefing up existing lines) near houses and open brushland, increases the risk of fire. SDGE and the CPUC may dispute that statement, but providers of homeowner's insurance coverage likely won't. The houses most impacted are those who already have a difficult time finding coverage, and who already pay a higher premium than their neighbors. The proposed powerline route in San Marcos puts those homeowner's at risk of losing coverage completely or paying even more (which is double the punishment for them).

For this project, the costs of alternatives have not been adequately studied. The primary stated reason from SDGE for the circuitous 12-mile pathway to connect to power stations five miles apart is cost. SDGE has stated that it will cost approximately \$36 million to construct the proposed plan, and at least double that to underground the five miles between power stations. The problem with its argument is that it is based on

A15-1

A15-2

A15-3

A15-4

www.san-marcos.net



speculation. The truth is the costs of undergrounding the project have not been studied, and there is reason to believe that undergrounding the lines might be much less than SDGE stated. Since undergrounding these lines addresses ALL the concerns of our residents (fire, aesthetics, insurance), this alternative should be thoroughly studied.

I respectfully request that the CPUC prepare an environmental impact report before it considers approving the proposed SDGE project.

Thank you.

Sincerely,

A handwritten signature in blue ink, reading "Randy Walton", is positioned below the word "Sincerely,".

Randy Walton
Councilmember

A15-4
(cont.)

Letter A15: City of San Marcos, Randy Walton, Councilmember

- A15-1 The CPUC acknowledges your opposition to the Project and concerns regarding aesthetics and noise. Please see Master Response 1, Aesthetics, and Master Response 3, EMF and Operational Noise.
- A15-2 The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire.
- A15-3 The CPUC acknowledges your concerns regarding insurance. Please see Master Response 5, Non-CEQA Issues.
- A15-4 The CPUC acknowledges your preference for underground power lines and the exploration of additional alternatives. Please see Master Response 4, CEQA Process, as well as Response to Comment A8-3.

2.4.2 Individual Comments

As explained in Section 2.2, General Responses to General Comments, many of the comments received from individuals are provided and responded to in Appendix B.1 because they do not warrant detailed agency response in this Final IS/MND for the reasons listed in Section 2.2.

Several individuals submitted comments that are sufficiently detailed and substantive as to warrant detailed responses from the CPUC. This section presents those comments as well as CPUC's responses to those comments. The five individuals who provided detailed comment letters raising significant environmental issues are listed below in **Table 2-2**.

TABLE 2-2
LIST OF INDIVIDUAL COMMENT LETTERS

Letter	Commenter	Date
I1	Donald M. de Camara	April 23, 2019
I2	Jon Lycett	May 30, 2019
I3	Robert Pack	May 30, 2019
I4	Andrew Patron	May 7, 2019
I5	Joseph Weslock	May 28, 2019

Law Offices of Donald M. de Camara

1241 Carlsbad Village Drive, Suite E
Carlsbad, CA 92008
Telephone (760) 730-7404
Facsimile (760) 730-7409

April 23, 2019

CA PUC

Attn: San Marcos-Escondido TL6975 Project
c/o Environmental Science Assoc./DDD
1425 N. McDowell Blvd., Ste. 200
Petaluma, CA 94954

Re: Objections to Negative Declaration

Dear Sir or Madam:

I reside at 1401 River Crest Rd. in San Marcos in the San Elijo subdivision. My house is pictured in attached page 18 from your Appendix 3A. As I understand it, there are approximately 3,200 single family homes in San Elijo and they are built on a fairly steep slope beginning at River Crest Rd. at the lower end and rising up near Double Peak Park at the upper end. My concerns with the proposed negative declaration and the project itself concern fire danger, destruction of views and placement of these high voltage towers much too close to residences (EMF).

FIRE DANGER

The Mitigated Negative Declaration shows that nearly all of the San Elijo neighborhood is in the "Very High Fire Severity Zone." The proposal agrees that the project creates a "significant risk" of causing wildfires. The existing and proposed lines run right next to the lower portions of San Elijo, along River Crest, Brookside and Sagewood Way. The canyon where the towers are located are covered with heavy brush and chapparal. In some areas like Sagewood and Brookside, the towers appear to be approximately a house width away from the homes. See attached page 17 from your Appendix 3A. If these lines or the construction thereof start a fire, it could quickly devastate the entire San Elijo neighborhood due to the steep topography and minimal setbacks. This appears to be a very dangerous situation, especially in light of a lack of egress from the neighborhood. The only way in or out of San Elijo is on San Elijo Road. There are 3 schools on the road and traffic jams when schools open or close and also during rush hour. Several years ago, there was a large fire that started near Cal State San Marcos and burned up near the top of the hill where Double Peak Park is. This is just over the hill from the top of San Elijo and San Elijo was therefore ordered evacuated. Even with all four lanes of San Elijo Road flowing westbound (including the eastbound lanes), traffic was stalled for hours. There was simply no way to evacuate the neighborhood in a timely fashion because there is no alternate egress route. Thus,

I1-1

if these high voltage lines, or the construction thereof, cause a wildfire, the results could be catastrophic. Because of poor civic planning, there is just no way to get out of San Elijo in an emergency.

SDG&E has a very poor history for maintaining its electric lines that is well documented and has caused several massive wildfires in the recent past. Adding more power lines immediately adjacent to the lower portion of a steeply sloped residential district is asking for trouble.

I1-1
(cont.)

PROXIMITY TO RESIDENCES

Attached page 17 from Appendix 3A appears to show the proposed power lines within 40-60 feet of the homes on Sagewood and Brookside. These homeowners are living almost directly under these power lines. Surely the EMF from these lines are problematic for these homeowners. Adding more lines in these areas may well make these homes unmarketable and raises issues of inverse condemnation.

I1-2

DESTRUCTION OF VIEWS

Before buying our house in June of 2013, we had our broker call SDG&E and ask whether there were any further or future plans to add any more electric lines in the canyon behind our house. She was told that there were no such plans. Like many of the houses in San Elijo, we have a nice ocean view. However, the view is under and through and around the high voltage lines and the extremely large ugly towers. This is true for many of the homes in the first rank of streets. Like developers everywhere, those at San Elijo charged a substantial premium for ocean view homes. We have been informed by our broker that in nice neighborhoods, an ocean view can raise the value of a house by about \$100,000 per floor of view. Therefore, we were quite surprised to note that in Table ES-2, you found that the project would have no "substantial adverse effect on a scenic vista." The Initial Significance Finding was rated "Less than Significant" and therefore no mitigation measures were deemed required. I respectfully submit that all of the owners living under or looking through these lines and towers every day would disagree with that assessment.

I1-3

SUGGESTIONS

I understand that there is an alternate 5.4 mile underground route available that would eliminate all of the above concerns. That should be pursued rather than elevating the already existing risk of fire destroying lives and property. Also, it appears that the new towers are being built even closer to the houses than the existing towers. It would appear far more reasonable, if the towers are going to be built despite these concerns, to put them farther away from the homes and farther down in the canyon. This would tend to somewhat mitigate the fire and EMF hazards.

I1-4

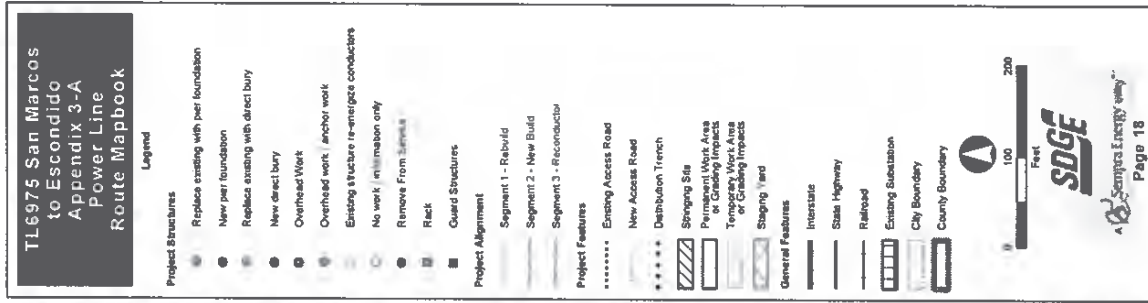
Thank you for your attention to these issues.

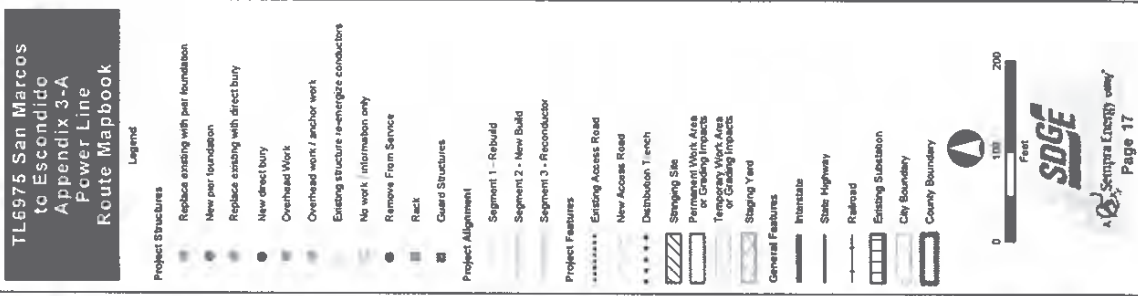
Very truly yours,

A handwritten signature in blue ink, consisting of a stylized 'D' followed by a cursive 'e' and a long horizontal line extending to the right.

Donald M. de Camara

Enclosures
cc: San Elijo HOA
DMd/jb





Letter I1: Donald de Camara

- I1-1 The CPUC acknowledges concerns regarding fire danger. Please see Master Response 2, Wildfire, which addresses the Project's location within a Very High Fire Hazard Severity Zone, the wildfire risk attributable to the Project, and concerns regarding evacuation safety.
- I1-2 The CPUC acknowledges the concerns regarding proximity to residences and potential economic effects. Please see Master Response 3, EMF and Operational Noise, and Master Response 5, Non-CEQA Issues.
- I1-3 Master Response 1, Aesthetics, addresses comments about Project impacts on public views. Regarding private views, please see Master Response, 5 Non-CEQA Issues.
- I1-4 The CPUC acknowledges the preference for underground alternatives. Please see Master Response 4, CEQA Process, in addition to Master Response 3, EMF and Operational Noise and Response to Comment A8-3.

From: [Jon Lycett](#)
To: [TL6975SanMarcos](#)
Subject: Comments to Draft IS/MND TL 6975 SDG&E A.17-011-010
Date: Thursday, May 30, 2019 4:40:33 PM
Attachments: [CPUC Comment Letter TL-6975.pdf](#)
[Resolution to Not require CPUC involvement in building TL138 25 IMPORTANT .pdf](#)

Mr. Davis,

Please see the attached comments to the above referenced project with one related attachment.

Jon Lycett

General Counsel

O: 858-277-7100 x249

F: 858-277-2500

Herman Construction Group, Inc.
2060 Wineridge Place, Suite A
Escondido, CA 92029

8(a) | SDVOSB | VOSB | SDB | SB | DVBE

Jon G. Lycett
1285 Emerald Sea Way, San Marcos, CA 92078

May 30, 2019

California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

Via email: TL6975SanMarcos@esaassoc.com

Re: Comments to Draft IS/MND for SDG&E TL-6975 Project

Mr. Davis:

Thank you for this opportunity to comment on the above referenced project (“Project”). Based on the following comments and hundreds of others submitted to the CPUC via this comment process and in public hearings, it seems beyond reasonable dispute that there is at least a “fair argument” that the Project will have a significant effect on the environment. Many of the conclusions to the contrary in the Draft IS/MND are not based on substantial evidence, but rather are unsupported subjective assessments, particularly with respect to aesthetics and noise impacts. Further, with respect to the risk of wildfire, the Draft IS/MND is only able to conclude that there is a less than significant impact by ignoring the scale of the environmental devastation and potential loss of life and property that would result from a wildfire caused by the construction or operation of the Project. Frequently, the mitigation measures offered amount to little more than lip service and wishful thinking. The CPUC must require a full EIR for this Project.

Before I comment directly on the IS/MND, I would like to make a general policy point. What is particularly troubling about the CPUC’s failure to require an EIR for the Project is the failure to fully evaluate project alternatives. Having done the legal research, it appears that, if the environmental impacts can be mitigated to below the “significance” threshold, CPUC is not required to evaluate alternatives. *See, e.g., Laurel Hills Homeowners Assoc. v. City Council*, 83 Cal.App.3d 515. This appears to be true, as in this case, even in the presence of an alternative that is clearly superior from an environmental perspective. I and many of my fellow neighbors strongly disagree that the environmental impact of the Project will be less than significant. Nonetheless, if the CPUC holds to its “less than significant” conclusion, while it may be technically legal to avoid an alternatives analysis, it would also be irresponsible.

SDG&E’s Proponent’s Environmental Analysis (“PEA”) evaluates a couple of alternatives. One of those alternatives would place the proposed transmission lines underground (the “Undergrounding Alternative”). This alternative, as the PEA admits, would completely eliminate all permanent environmental impacts. Temporary construction impacts, on the other

I2-1

hand, could be increased slightly. Importantly, the Undergrounding Alternative would eliminate wildfire risk. The alternatives analysis is not careful or deep, but the Undergrounding Alternative is rejected by the PEA primarily due to increased cost.

How much increased cost? The PEA provides a loose estimate. The analysis, however, is not very well supported. For example, did SDG&E choose the most efficient route? Might another route be less expensive? How do the costs compare to the Project's costs? The analysis in the PEA is insufficient to make any determination.

As a matter of policy, I urge the CPUC to use its discretion to require a full analysis of an undergrounding alternative every time a new power line is proposed for a high fire risk area, as it is in this case. While the added wildfire risk from a new line might be individually low, the potential damage caused by a fire is devastating and life-threatening. The decision to run above-ground power lines through high fire risk areas is the ultimate in pennywise and pound-foolish thinking. Hundreds of lives have already been lost, billions of dollars in property damaged, and the environment permanently altered by previous fires caused by utility power lines under the CPUC's jurisdiction. The CPUC cannot continue to act as nothing more than a rubber stamp for these projects. The CPUC owes it to the people who live near these powerlines to fully evaluate an undergrounding alternative and expressly explain why the additional cost, if any, is not justified by the small additional risk to their lives and property. Failing to require an EIR that fully evaluates the Undergrounding Alternative for this Project is an abdication of the CPUC's responsibility and a grave mistake.

I2-1
(cont.)

With that policy point made, please consider the following specific comments on the IS/MND:

1. *Section 3.21.1 b*): The cumulative impacts analysis fails to address any past electrical transmission projects, and specifically ignores the one most relevant past electrical transmission project.

Table 3.21-1 lists the past, current and potential future projects the IS/MND analyzed in support of its cumulative impacts analysis. Notably lacking from that list is any past, current or future projects involving electrical transmission lines similar to the Project. Any such project, especially any such project within or close to the same ROW occupied by the Project, would tend to directly contribute to the cumulative impact of the Project in every area analyzed. The failure to include any such project makes the cumulative impacts analysis inherently deficient.

I2-2

Specifically, the IS/MND fails to include the most relevant, immediately past project, which was constructed along much the same path as the Project, within the same ROW. (See attached CPUC Resolution E-4245 ("Shadowridge Project").) The Shadowridge Project had many of the same environmental impacts that the CPUC is choosing to ignore now, which several local residents (including me) identified at that time. The CPUC's conclusions about the Shadowridge Project were wrong in 2008; the impacts of that project were substantial. Indeed, they were so substantial that they significantly drive the opposition the CPUC is seeing to the Project. The combined impact of the analyzed Project and the Shadowridge Project is undeniably substantial. Any future projects along the same ROW must also be considered as part of any reasonable cumulative impacts analysis. The IS/MND's failure to mention or otherwise consider the

cumulative impact of the Shadowridge Project in the cumulative impacts analysis makes that analysis completely deficient.

2. Section 3.21.1 b). The cumulative impacts analysis fails to analyze the relevant impacts of the projects considered.

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other *closely related* past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines § 15355 (emphasis added). The emphasized phrase from the Guideline’s definition of “Cumulative Impacts” further shows the error in the CPUC’s analysis. While, the projects identified in Table 3.21-1 have many similar environmental impacts to the Project, which may contribute to a cumulative effect, the more relevant analysis is different and ignored by this analysis.

I2-2
(cont.)

Here, the relevant analysis is the extent to which the identified projects and others will contribute to the need for more powerlines. Especially more powerlines within the ROW containing the current project, but also the general need for powerlines, both transmission and distribution lines, regionally. Indeed, there are no electrical infrastructure projects on Table 3.21-1 whatsoever. The IS/MND completely ignores the cumulative environmental impact of past, present, and projected future electrical energy projects of any kind. This is an odd omission because electrical transmission lines and related infrastructure are uniquely within the expertise and planning authority of the CPUC.

The CPUC cannot treat each individual powerline project as a separate unit. CEQA requires the CPUC to analyze the cumulative impact of all powerline projects in the area with similar impacts.

3. Section 3.21.1 b): The cumulative impacts analysis adopts an impermissible “de minimis” argument to find less than significant impacts in several areas.

Earlier versions of the CEQA Guidelines allowed reviewing agencies to avoid a cumulative impacts analysis if the project’s impacts could be considered “de minimis.” This approach, however, was rejected by the courts, and those provisions were removed from the Guidelines. *See Communities for a Better Environment v. California Resources Agency*, 103 Cal.App.4th 98, 116 – 121, disapproved on other grounds in *Berkeley Hillside Preservation v. City of Berkeley*, 60 Cal.4th 1086, 1109 fn.3

I2-3

[The de minimis provisions] contravene the very concept of cumulative impacts. Their application would turn cumulative impact analysis on its head by diminishing the need to do a cumulative impact analysis as the cumulative impact problem worsens. . . . The reason for this incongruity is that the de minimis approach . . . compares the incremental effect of the proposed project against the collective cumulative impact of all relevant projects.

Id. at 117.

Although it has been rejected by the courts and is no longer in the Guidelines, this faulty de minimis analysis pervades the IS/MND. Consider the following examples:

Aesthetics: “In each Project segment, there are existing utility transmission structures. While the changes attributable to the Project would be visually apparent (i.e., new, taller steel poles), the character of the new structures would not substantially affect the existing visual character or quality in the Project area.” 3.21-10.

I2-3
(cont.)

Biological Resources: “The combined temporary and permanent impact of 2.2 acres of habitat within the BSA and larger area encompassed in this cumulative analysis constitutes less than 1 percent. In this context, the Project’s incremental less-than-significant impact would not cause or have a cumulatively considerable contribution to any significant cumulative effect relating to special-status reptile and mammal species.” 3.21-14.

I2-4

Wildfire: “The Segment 2 New Build would involve constructing a new power line; however, this line would be constructed within an existing ROW where an existing power line is located. Therefore, once operational, the Project would not introduce a substantial new source of wildfire risk associated with operation and maintenance activities. Although there would be sufficient separation (30 feet) between the existing 138 kV Tie Line 13811/13825 and the Segment 2 New Build to prevent the two lines from crossing and creating an arc, due to the addition of the Segment 2 line, operation of the Project could result in a minor increase in the risk of wildland fires in the area.” 3.20-14.

I2-5

Using this kind of analysis, one could construct anything, as long as it was done one small project at a time. If you can have one set of power poles, why not two? Why not 30? As each new line is added, whether it is on a pole or not, the fire danger increases measurably each time, albeit slightly, for nearby residents. The aesthetic impact increases noticeably. And more and more habitat is incrementally lost, 2.2 acres at a time. This is exactly the kind of analysis the cumulative impacts requirements were designed to prevent. The impacts of this project must be analyzed in combination with the existing powerlines, not excused because those other powerlines already exist.

I2-6

4. Section 3.13: The mitigation measures for noise impacts fail to analyze the extent to which the mitigation identified will actually mitigate the likely impacts.

Poles 42, 43, 45, 47, and 49 along Segment 1 are extremely close to residences in the Rancho Dorado neighborhood. See Powerline Route Map, panels 6 and 7 (submitted by SDG&E in response to CPUC Deficiency Letter 2) (“Powerline Route Map”). In some cases, the distance to the identified receptors is less than the 50 ft analyzed for noise. Additionally, in that specific location along San Marcos Blvd./Palomar Airport Road, there is a substantial block wall less than 2 feet from the existing wood pole (in some cases much less than 2 ft.). If demolition of that wall is required so close to the residences, construction debris might even be in danger of falling onto closely neighboring residential property. The IS/MND does not analyze these potential impacts because the Project proponent was permitted to keep the specifics of both the construction and the related mitigation vague and incomplete.

I2-7

Specifically, with respect to the analysis of noise impacts, the IS/MND concludes:

Since sensitive receptors were identified within 20 feet of on-site construction areas and there is potential for construction activities outside of daytime hours (i.e., nighttime, weekend, holiday), construction noise could constitute a substantial temporary increase in ambient noise levels in the Project vicinity.

3.13-20. Mitigation for this impact amounts to asking the Project proponent to be careful (“Noise Reduction”), but only to the extent it “does not interfere with construction.” 3.13-24. The Project Proponent is also required to notify nearby residents of when loud noises will occur and listen to complaints (“Notification and Correction”). 3.13-24 to 3.13-25. The plan provides for relocation, but no specific criteria for that extreme option are provided. 3.13-25. The plan for blasting is to similar effect. 3.13-25 to 3.13-26.

I2-7
(cont.)

It is not clear how these supposed mitigation measures change the environmental impact identified. They are toothless and offer impacted residents little more than help with coping. This is a significant impact for residents nearby Poles 42, 43, 45, 47, and 49, among others.

5. The IS/MND ignores potential impacts to the Carlsbad Water District water tank on White Sands drive.

The Carlsbad Water District owns a water tank near the Project off White Sands Drive. *See* Powerline Route Map, panel 11. I have tried, but I have never been able to confirm that potential impacts to the operation of this facility have been considered and cleared. Pole 57 appears to me to be potentially close enough to the tank to interfere with maintenance and possibly operation. The City of Carlsbad denies any record of being contacted by the Project proponent prior to release of the MND. The Project proponent was unable to document any such contact. This should be resolved.

I2-8

Lastly, I echo the calls of all my neighbors, the CPUC must at least prepare an EIR for this project. The IS/MND fails to properly analyze, much less establish mitigation for, the acknowledged impacts of this project. The increased wildfire risk alone should justify a complete analysis of alternatives to this ill-advised project. An EIR is required.

I2-9

Respectfully,

Jon Lycett

DATE OF ISSUANCE: 06/09/09

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-4245

R E S O L U T I O N

Resolution E-4245. San Diego Gas & Electric Company (SDG&E). This Executive Director Action Resolution finds that SDG&E Advice Letter 2030-E, notifying the Commission of the proposed construction of Shadowridge Transmission Enhancement Project, is exempt from the requirements to obtain a Permit to Construct ("PTC Requirements") pursuant to General Order 131-D ("GO 131-D"), Section III, Subsection B.1.g. ("Exemption g."); and dismisses the protests submitted to the Commission because the facts claimed in the protests do not support a finding that the exception criteria contained in GO 131-D, Subsection B.2.a-c. exists.

By Advice Letter 2030-E. Filed on October 8, 2008.

SUMMARY

This Executive Director Action Resolution finds that SDGE Advice Letter 2030-E, notifying the Commission of the proposed construction of Shadowridge Transmission Enhancement Project, is exempt from the requirements to obtain a Permit to Construct ("PTC Requirements") pursuant to General Order 131-D ("GO 131-D"), Section III, Subsection B.1.g. ("Exemption g."); and dismisses the protests submitted to the Commission because the facts claimed in the protests do not support a finding that the exception criteria contained in GO 131-D, Subsection B.2.a-c. exists. This Resolution is effective immediately.

BACKGROUND

On October 8, 2008, SDG&E filed Advice Letter 2030-E. Protests or comments were due to the Commission on October 28, 2008; four protests were filed.

Pursuant to General Order (G.O.) 131-D, Section XI, Subsection B.4, SDG&E submitted a notice of construction of the Shadowridge Transmission

Enhancement Project (STEP) from the Shadowridge Substation located in the City of Vista to Meadowlark Junction in the City of San Marcos. The project is located in the cities of Vista, Carlsbad, San Marcos, and the County of San Diego.

The proposed project will construct a new 138kV loop circuit (TL 13825), approximately four miles long, from the Meadowlark Junction into the existing Shadowridge Substation. The new double circuit 138kV line will be constructed on approximately 25 new steel tubular galvanized poles mounted on concrete foundations. This new line replaces an existing 138kV single circuit wood pole line, which will be removed after the new line is constructed and energized. Upgrades at the Shadowridge Substation will include the installation of a new circuit breaker within the substation fence.

The proposed project will create a new 138 kV loop circuit (TL 13825) from the Meadowlark Junction into the exiting Shadowridge Substation constructed on approximately 25 new steel tubular galvanized poles mounted on concrete foundations. Approximately 25 new structures will replace the 32 structures supporting the existing line. A total of approximately 60 wood poles and one steel lattice tower will be removed. The new poles will be an average of 25 feet higher (averaging approximately 84 feet tall) than the existing double-pole wood H-frame structures and single wood poles being replaced (averaging approximately 59 feet tall), depending on the span length (distance between poles). Each new structure is designed to support two electric transmission circuits and one fiber optic wire. The existing TL 13825 between Shadowridge Substation and Meadowlark Junction is a 138 kV single circuit transmission line built on H-frame (two-pole) wood structures.

TL13825 in its current configuration is a 3-terminal tie line connecting the existing Batiquitos, Shadowridge, and Chicarita Substations. The proposed project will reconfigure the three terminal lines by opening the tap at Meadowlark Junction to create a two new 2-terminal 138 kV circuits. One circuit (TL13825) will connect Shadowridge to Batiquitos Substation. The other circuit will connect Shadowridge to Chicarita Substation.

The proposed project will be constructed while the line on the existing H-frames remains in service. Temporary outages on the existing 138kV circuit may take place daily while foundations are excavated for the new poles and when new poles are being erected. No customer load will be affected by these construction outages. After the new poles are erected, the new conductors and fiber optic line

will be strung and attached to the poles. All construction will take place entirely within the existing ROW. Work at the Shadowridge Substation will take place entirely within the fenced area of the existing facility.

A minor relocation of existing electric distribution facilities is required to maintain conductor clearance for the proposed transmission circuits. The distribution relocation involves the undergrounding of approximately 1,600 feet of existing overhead distribution lines.

GO 131-D

GO 131-D was adopted by the Commission in Decision D. 94-06-014 and modified by D.95-08-038. Pursuant to GO 131-D, Section III.B.1.g., SDG&E claims that the proposed facility construction meets the specific conditions that exempt SDG&E from the PTC Requirements. SDG&E claims that the proposed facilities will be consistent with following exemption criterion:

power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement; or in a utility corridor designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies for which a final Negative Declaration or EIR finds no significant unavoidable environmental impacts.

Energy Division has confirmed that the proposed facilities will be located entirely within SDG&E existing easements, rights-of-way ("ROW") and SCE fee-owned property.

GO 131-D Section III.B.2. contains exception criteria, which if applicable, do not permit exemptions from the PTC Requirements. Exemptions from the PTC Requirements do not apply when any of the conditions specified in CEQA Guidelines § 15300.2 exist:

a. there is reasonable possibility that the activity may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies; or

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SDG&E AL 2030-E/JNR

- b. the cumulative impact of successive projects of the same type in the same plate, over time, is significant; or
- c. there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

A valid protest must state facts demonstrating “that any of the conditions described in Section III.B.2 exist or the utility has incorrectly applied an exemption as defined in Section III...” (GO 131-D, Section XIII).

NOTICE

Notice of AL 2030-E was made by publication in the Commission’s Daily Calendar. SDG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-B.

PROTESTS

Advice Letter 2030-E was protested.

Within the 20-day protest period specified in GO 131-D, the Commission received four protests (Protest) to AL 2030-E. The following protests were received: Rancho Dorado Owners Association; Rancho Carrillo Master Association; and Individuals James Lambert (on behalf of certain residents of San Marcos and Carlsbad); and Jon Lycett (collectively referred to as “Protestants”).

The protests raise questions about the Project in the following areas: (1) the project may impact aesthetics and property values; (2) the project may impact environment or sensitive species; (3) the project may increase magnetic fields; (4) the project may be a source of fire; (5) the project may increase airplane accidents.

SDG&E has addressed each of the issues raised in the Protests above. SDG&E claims that the protests fail to demonstrate that the conditions specified in CEQA Guidelines 15300.2 and GO 131-D, B.2.a.-c. , which would require an application for a permit to construct, exist. SDG&E claims that the grounds for a valid protest under Section XIII of GO 131-D have not been met and, therefore, the protests should be dismissed.

The following Section summarizes the grounds of the protests, SDG&E responses to the protests, and states Energy Division's findings with regard to whether the facts alleged in the protests meet the criteria for a valid protest pursuant to GO 131-D, Section XIII.

DISCUSSION OF PROTESTS

Aesthetics or property values

Protests claim that the construction of additional powerlines will have a significant impact on scenic views and the existing visual character and quality of the sites and surroundings.

SDG&E responded that according to CEQA aesthetic criteria, the proposed project does not meet the thresholds that indicate significant impact. SDG&E argues that the project would result in a small incremental aesthetic change, and would not substantially impact the visual quality of the site.

Regarding the proposed project's impact on property values, SDG&E claims no systematic measure of property value impact resulting from proximity to electric facility has been established. Further, Energy Division agrees with SDG&E that an accepted methodology for assessing the property value impact resulting from the proximity of electrical facilities has yet to be established.

Energy Division finds that the incremental nature of the proposed power lines in the established right-of-way would not result in a potentially significant aesthetic impact as defined by CEQA guidelines.

Impact to sensitive plant and animal species

Protesters note that an exception to Exemption g. exists if there is a reasonable possibility that the Project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state or local agencies. Protesters claim that SDG&E right-of-way is directly adjacent to areas that are designated and preserved open space by the Cities of Vista, Carlsbad and San Marcos and that these areas may be home to several endangered species.

SDG&E replied that for purposes of claiming that an exception to exemption g. exists for impacts to biological resources under CEQA Guidelines Section 15300.2 there must be a reasonable possibility that the Project may impact on an environmental resource of hazardous or critical concern where designated,

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precisely mapped and officially adopted pursuant to law by federal, state or local agencies. SDG&E points out that none of the protests make this claim.

Commission staff discussed the potential impacts to listed species with SDG&E. SDG&E provided vegetation maps complying with Natural Community Conservation Planning (NCCP), Carlsbad Habitat Management Plan (HMP) vegetation map within the Shadowridge right-of-way, and a map of all USFWS Designated Critical Habitat within 2 miles of the project alignment

Energy Division finds that the conditions specified in CEQA guidelines Section 15300.2, namely subsection (a) do not exist because the project ROW sections with designated, precisely mapped habitat were surveyed and were found to be devoid of sensitive species. Thus, there is not a reasonable possibility that the activity of constructing the facilities would impact listed sensitive species.

EMF

Many protests allege that the Project will cause increased cumulative EMF exposure.

SDG&E responded that EMF exposure is not a sufficient basis for a protest citing Commission Decision 96-04-094, which at page 5 states: "Concern about possible EMF exposure resulting from a project is not sufficient basis for finding that an exemption under Section III.B.2a, (b), or (c) exists..."

The action plan established in Commission Decision 93-11-013 adopting various "no-cost and low-cost" measures into the construction of new or upgraded power facilities will be implemented by SDG&E as part of this project.

Energy Division finds that EMF exposure is not a sufficient basis for qualifying for an exception that would override Exemption g and EMF exposure resulting from the project is not sufficient basis for finding that an exemption under Section III.B.2a-c. exists.

Brush fire

Protesters claim that the proposed facilities have the potential to result in increased fire hazards.

SDG&E responded that under the excepted conditions specified under Section III.B.2 of GO 131-D, the application of CEQA Guidelines Section 15300.2(c)

override an exemption where two conditions exist: (1) the project presents unusual circumstances and (2) there is a reasonable possibility of a significant environmental impact due to those unusual circumstances. Whether a circumstance is “unusual” is judged relative to the typical circumstances related to an otherwise typically exempt project. It is inevitable that most, if not all, of SDG&E power line modification projects exempt from GO 131-D, pursuant to Section III.B.1.g would be at least partially constructed in a high fire area due to the nature of SDG&E service territory. Approximately 56 percent or more depending on seasonal weather and climate conditions, of SDG&E service territory has been designated as very high fire hazard severity zone on Cal Fire maps for local responsibility area lands. Given the presence of other overhead power lines throughout high fire hazard areas within SDG&E service territory, the Project does not present an “unusual circumstance”.

Energy Division finds that potential brushfire and seismic concerns do not constitute “unusual circumstances” in SDG&E service territory.

Impact on aerial safety

Protesters claim that the construction of the project will have an impact on aerial safety.

SDG&E requested that the Federal Aviation Administration (FAA) conduct an aeronautical study in 2008 for the entire project. The FAA’s aeronautical study determined that selected structures exceeded obstruction standards, but the power line would not be a hazard to air navigation provided certain precautionary measures were met. SDG&E intends to comply with the FAA recommendations, such that the FAA’s final determination of “no hazard to air navigation” would be in effect.

Based on SDG&E’s compliance with the FAA’s requirements and on the FAA’s final determination, Energy Division finds that there is no hazard to air navigation.

DISCUSSION

Energy Division has reviewed SDG&E Advice Letter 2030-E submitting notice pursuant to General Order 131-D (GO 131-D), Section XI, Subsection B.4 for the Construction of Facilities that are exempt from a Permit to Construct as well as

the protests that were submitted. Energy Division has concluded that the proposed facilities meet the criteria for an exemption from PTC Requirements because construction consists of power line facilities or substations to be located in SDG&E existing franchise, road-widening setback easement, or public utility easement.

Staff has also concluded that the protests filed do not contain facts that support a finding that: there is reasonable possibility that the activity may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies; the cumulative impact of successive projects of the same type in the same place, over time, is significant; or there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. Therefore, the protests do not meet the criteria for an exception from Exemption g., which would require SDG&E to apply for a permit to construct.

FINDINGS

1. On October 8, 2008, SDG&E filed Advice Letter 2030-E. Protests or comments were due to the Commission on October 28, 2008; four protests were filed.
2. The proposed project will construct a new 138kV loop circuit (TL 13825), approximately four miles long, from the Meadowlark Junction into the existing Shadowridge Substation.
3. The new double circuit 138kV line will be constructed on approximately 25 new steel tubular galvanized poles mounted on concrete foundations.
4. This new line replaces an existing 138kV single circuit wood pole line, which will be removed after the new line is constructed and energized.
5. Upgrades at the Shadowridge Substation will include the installation of a new circuit breaker within the substation fence.
6. Advice Letter 2030-E was protested.
7. The following protests were received by: Rancho Dorado Owners Association; Rancho Carrillo Master Association; and Individuals James Lambert (on behalf of certain residents of San Marcos and Carlsbad); and Jon Lycett (collectively referred to as "Protestants").
8. The protests raise questions about the Project in the following areas: (1) the project may impact aesthetics and property values; (2) the project may impact environment or sensitive species; (3) the project may increase magnetic fields;

- (4) the project may be a source of fire; (5) the project may increase airplane accidents.
9. SDG&E has addressed each of the issues raised in the Protests.
 10. Energy Division finds that the incremental nature of the proposed power lines in the established right-of-way would not result in a potentially significant aesthetic impact as defined by CEQA guidelines. Energy Division finds that the conditions specified in CEQA guidelines Section 15300.2, namely subsection (a) do not exist because the project ROW sections with designated, precisely mapped habitat were surveyed and were found to be devoid of sensitive species. Thus, there is not a reasonable possibility that the activity of constructing the facilities would impact listed sensitive species.
 11. Energy Division finds that EMF exposure is not a sufficient basis for qualifying for an exception that would override Exemption g and EMF exposure resulting from the project is not a sufficient basis for finding that an exemption under Section III.B.2a-c. exists.
 12. Energy Division finds that potential brushfire and seismic concerns do not constitute “unusual circumstances” in SDGE service territory.
 13. Based on SDG&E’s compliance with the FAA’s requirements and on the FAA’s final determination, Energy Division finds that there is no hazard to air navigation.
 14. Energy Division has reviewed SDG&E Advice Letter 2030-E submitting notice pursuant to General Order 131-D (GO 131-D), Section XI, Subsection B.4 for the Construction of Facilities that are exempt from a Permit to Construct as well as the protests that were submitted.
 15. Energy Division has concluded that the proposed facilities meet the criteria for an exemption from PTC Requirements because construction consists of power line facilities or substations to be located in SDGE existing franchise, road-widening setback easement, or public utility easement.
 16. Staff has also concluded that the protests do not meet the criteria for an exception from Exemption g., which would require SDG&E to apply for a permit to construct.

IT IS HEREBY RESOLVED:

1. The findings of Energy Division Staff are hereby adopted by the Executive Director.

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2. SDG&E Advice Letter 2030-E, notifying the Commission of the proposed construction of utility facilities, is exempt from a Permit to Construct pursuant to General Order 131-D, Section III, Subsection B.1.g.
3. The protests are dismissed because the facts claimed in the protests do not meet the exception criteria contained in GO 131-D, B.2.a-c.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by Executive Director Action Resolution on June 9, 2009.

/s/ Paul Clanon
Paul Clanon
Executive Director

Letter I2: Jon Lycett

- I2-1 The CPUC acknowledges the commenter's preference for underground power lines and/or other alternatives, and the request for an EIR. Please see Master Response 4, CEQA Process, and Response to Comment A8-3. The CPUC also acknowledges the concerns regarding aesthetics, wildfire, noise, property values, and Project cost. Please refer to Master Response 1, Aesthetics, Master Response 2, Wildfire, Master Response 3, EMF and Operational Noise, and Master Response 5, Non-CEQA Issues.
- I2-2 Please see Master Response 1, Aesthetics, which addresses comments about the cumulative impact analysis for Segment 2 in combination with the existing TL 13811/13825 ("Shadowridge Project") in the same ROW. As stated on Draft IS/MND page 3.21-3, "Existing conditions within the cumulative impact area of effect reflect a combination of the natural condition and the effects of past actions in the affected area." TL 13811/13825 is one of those past actions, and is discussed in the cumulative impacts analysis. Although Table 3.21-1 lists approved and reasonably foreseeable future projects, to help clarify that TL 13811/13825 is considered a project in the cumulative scenario, it has been added to Table 3.21-1 and additional discussion has been added to Section 3.21 of the Final IS/MND regarding cumulative aesthetic impacts. Both projects would be co-located in a long-established power utility right-of-way. The presence of utility infrastructure would not be an uncharacteristic visual component in viewsapes which include the right-of-way. Both lines would have consistent line, form, color, and texture. Therefore, when considered together, the overall visual contrast and change attributable to past, present, and future projects in the right-of-way would be low to moderate. See revisions in Chapter 3 of this Final IS/MND for the full revised text.
- I2-3 Please see Master Response 1, Aesthetics and the revisions to Section 3.21 of the Final IS/MND. As explained therein, the cumulative impacts analysis in Aesthetics has been revised to more clearly explain the Project's relationship to related past, present, and reasonably foreseeable future projects.
- I2-4 Text in Section 3.21 has been revised to clarify that the determination that the Project's contribution to potentially significant cumulative impacts on biological resources would not be cumulatively considerable was made based on the Project's adherence to the Subregional NCCP requirements, which are intended to protect biological resources on a cumulative basis. Please see revisions in Chapter 3 of this Final IS/MND.
- I2-5 Please see Master Response 2, Wildfire, which further clarifies the basis for Project-specific and cumulative determinations related to wildfire risk. As further explained in the Master Response, the Project would not significantly exacerbate wildfire risks and, therefore, would not expose surrounding communities to the uncontrolled spread of a wildfire.
- I2-6 Please see Responses to Comments I2-3 through I2-5. The analysis of cumulative impacts appropriately considers the Project's incremental impact in combination with

- existing conditions and documented past, present and reasonably foreseeable future projects.
- I2-7 As cited in the comment, the Draft IS/MND does analyze and disclose potentially significant noise impacts on sensitive receptors (e.g., residences) within 20 feet of construction areas. Specific pole locations and construction areas are depicted on aerial imagery showing proximity to residences in Draft IS/MND Appendix A, and specific equipment types and noise levels are provided in Draft IS/MND Section 3.13, Noise (Table 3.13-12). With respect to Mitigation Measure NOI-1, the measure includes, among other things, a requirement to muffle and enclose stationary construction noise sources “to the extent this does not interfere with construction”. It would not be feasible to erect barriers that would physically prevent construction of the Project. However, the noise impact is further reduced to below the level of significance by requiring SDG&E to notify residents and correct noise exceedances, and to provide for temporary relocation of residents if there is the potential for construction noise to exceed 75 dBA L_{eq} within 100 feet of sensitive receptors. Relocation would reduce or avoid the impact on sensitive receptors to below the level of significance by providing an option to allow residents to avoid the construction noise impact by temporarily relocating (e.g., to a hotel) at the utility’s expense.
- I2-8 There is no evidence that the Project would interfere with the maintenance or operation of the referenced water tank, or that it would have any potentially significant environmental impacts related to this water tank. Given the existence of the ROW and TL 13811/13825 already in proximity to the water tank, and the proposed use of existing access roads in that location (see Draft IS/MND Appendix A, Figure A-11), the CPUC has not identified any potential environmental impacts relevant to its CEQA review of the Project.
- I2-9 The request for an EIR is acknowledged. Please see Master Response 4, CEQA Process.

From: Dr. Robert H. Pack
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To: California Public Utilities Commission
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Petaluma, CA 94954

Date: May 30, 2019

I am a resident of Rancho Dorado and live approximately 200 feet west of segment 2 of SDG&E's proposed project TL6975 (the Project). I was the original purchaser of this house in 2001. I am writing because I, along with hundreds if not a thousand or more of my neighbors as well as the City of San Marcos who believe a more thorough and in-depth analysis of SDG&E's proposed TL6975 project needs to be conducted through the preparation of an Environmental Impact Report (EIR). The draft IS/MND (IS for short) of the Project not only lacks substantial evidence supporting the analysis (and as I will show in this letter particularly as it applies to the aesthetic analysis and the selection of KOPs and scenic vistas) and conclusions that some of the project impacts (again I will focus on aesthetics primarily in segment 2 and in particular in Rancho Dorado in this letter but others are addressing other CEQA factors) can be appropriately considered less than significant. Additionally, the IS is incomplete and sometimes even incorrectly applies CEQA. For these reasons and others as will be outlined below I am requesting an EIR be completed so a thorough and unbiased analysis of these impacts including the mitigation measures can be completed. An additional outcome of an EIR is there will be a full analysis and consideration of viable alternatives which to this point has not happened because the PEA's consideration was cursory and did not include several alternative routes, or combination of routes, that could have fulfilled the two primary objectives of the Project (eliminate NERC violations and eliminate existing congestion and improve reliability) but instead looked at several alternatives that could not meet those primary objectives and quickly discarded them because they did not meet the two primary objectives. Additionally without an EIR, which based on the community comments I heard voiced at three separate public meetings (two on April 30 held by the CPUC and one on May 14 in front of the San Marcos City Council) approximately 100 of the approximately 400 impacted residents from in and around the Project clearly voiced an essentially unanimous desire to have an EIR conducted (some did not mention an EIR specifically, but there was unanimous agreement among all about their sincere concerns regarding the Project). Conducting an EIR will allow for a fair evaluation of alternative routes which has not happened to this point and a more thorough and complete analysis of the environmental impacts the Project will have on the environment of our communities before giving final approval to the draft IS/MND. I realize that consideration of alternatives is a moot point if the IS determines there are no significant impacts to the environment that cannot be mitigated which was the finding of the IS. For that reason my goal in this letter is to demonstrate that the IS conclusion that all nineteen environmental factors create a less than significant impact with mitigation is incorrect and that at least one factor, Aesthetics, if not more of the Initial Study's evaluation of CEQA's nineteen environmental factors is significantly impacted by the Project and cannot be easily mitigated without a consideration of alternatives. My goal is to 'present a fair argument that the Project may have a significant effect on the environment' because according to CEQA 15064 (f) (1) "If the lead agency determines there is substantial evidence in the record that the project may have a significant effect on the environment, the lead agency shall prepare an EIR (*Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988). Said another way, if a lead agency is presented

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with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68).” the CPUC shall prepare an EIR. Finally, as stated in CEQA 15003 (b) “The EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected. (*County of Inyo v. Yorty*, 32 Cal. App. 3d 795.)” and by having an EIR prepared the many hundreds of the residents who have voiced their concern either in public or online will feel they are being ‘protected’ which makes the EIR even more important.

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I have two main concerns as it specifically relates to the analysis of the environmental impact on the aesthetics of our community. First has to do with the thoroughness and validity of the selection of the KOP and the scenic vistas. The second has to do with not adequately considering the cumulative impact of past, present, and future projects in determining whether their impacts are cumulatively considerable on aesthetics. Specifically, in this regard, the IS did not consider relevant past projects when completing their cumulative impact determination. I also believe this may be a problem that could apply to some of the other, if not all nineteen environmental factors; however, I will focus specifically on the Initial Study’s determination of whether there was a significant cumulative impact on the Aesthetics environmental factor. The totality of the cumulative impact analysis for aesthetics takes one page and of that one page most is a repeat of what was covered in section 3.1 (Aesthetics). At the end of this on-page discussion IS states on page 3.21-10 in the concluding sentence “Therefore, the Project’s impacts would not combine with the impacts of other projects to cause or contribute to a significant cumulative effect.” The ‘other projects’ referenced here are the 44 projects listed in table 3.21-1 “Cumulative Scenario”. However, upon examination of those 44 other projects none of them are from the past, as required to be consider by CEQA under 15064 “DETERMINING THE SIGNIFICANCE OF THE ENVIRONMENTAL EFFECTS CAUSED BY A PROJECT”. CEQA 15064 (h)(1) states, “When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” This analysis did not consider past projects or as an example, it would have discussed past projects including the Shadowridge Transmission Enhancement Project (STEP) from Shadowridge substation to Meadowlark Junction. This project by SDG&E was constructed in the spring of 2010 and runs the entire 2.8 miles of segment 2 and is the current steel poles and power lines of the current Project. Because this project did not need additional ROW to complete the construction there was no proceedings with the CPUC. Both projects should have been taken into account to determine if the cumulative impact was cumulatively considerable. Leaving out consideration of past projects such as STEP does not follow CEQA’s requirement of considering “past projects, the effects of other current projects, and the effects of probably future projects”.

I3-4

If the cumulative impact of STEP along with the Project had been considered the visual change from before STEP (pre-2010) to what segment 2 would look like after the construction of the Project would have been rated as high. Please review pictures #30-#32 for a simulation of the change in the view from Simmons Family Park showing the view to the Pacifica Ocean to the west from before 2010 when there were only small discreet wooden poles (#30) to the current view of the Pacific Ocean (#31) to a simulation after the Project is constructed (#32). These simulations were based off SDG&E’s simulation for KOP D and from an original picture taken on March 17, 2010 of the wooden poles next to the brand new, at the time, steel pole (pole #59). If that analysis had been completed the viewer sensitivity for question ‘a) Whether the Project would have a substantial adverse effect on a scenic vista?’ would have been rated high. If the IS had chosen the most obvious of the scenic vistas in North county of the Pacific

I3-5

Ocean (pictures #2 and #3) they would have included the scenic vista from Simmons Family Park as one of scenic vistas to be analyzed. The IS does not say how they picked the four potential scenic vistas in table 3.1-3 which were Rancho La Costa Preserve, Diamond Trail Preserve, Sage Hill Preserve, and Escondido Creek Preserve. The IS says on page 3.1-17 “There are no officially designated vistas in the study area. The Project could be visible in long distance views from some locations in the Rancho La Costa Preserve, Diamond Trail Preserve, Sage Hill Preserve, and Escondido Creek Preserve.” This is actually not a true statement because a portion of Rancho La Costa Preserve runs under segment 2 so to say ‘could be visible in long distance views’ is not understanding where the Preserve runs. I believe the reason the IS said this is because the map for Rancho La Costa Preserve, according to the reference on page 3.1-29 was taken from the City of Carlsbad website

(<http://www.carlsbadca.gov/services/depts/parks/open/trails/preserve/default.asp>) which was a mistake because it only shows the parts of the preserve that are in Carlsbad and does not show the portion of the preserve that goes under segment 2 which is in San Marcos. Using this incorrect map also explains why the IS in their analysis of the whether Rancho La Costa Preserve would have its view of the Pacific Ocean obstructed said “No, the Project is located to the east behind the viewer”. In fact there is a beautiful scenic hiking trail called Quarry Trail that runs directly under the power lines of segment 2 and continues east through the Northeastern section of Rancho La Costa Preserve which is definitely east of segment 2 and would have a scenic view of the Pacific Ocean and it would be impacted by the Project (picture #7 and #8).

Another problem with the IS analysis of the question “a) Does the Project have a substantial adverse effect on a scenic vista?” relates to it evaluation of the Diamond Trail Preserve. First the IS, like it did for Rancho La Costa Preserve said the Project could be visible in long distance views, yet the eastern border of Diamond Trail Preserve is approximately 500 feet from segment 2 so again that statement is not accurate. Second to analyze Diamond Trail Preserve for its scenic view of the Pacific Ocean to determine the impact the Project would have on scenic vistas in the study area in not justifiable given the preserves accessibility and relative usage by people in this area. Diamond Trail is not a place people go to view the Pacific Ocean. It only has one entrance off Carrillo Way which is hard to find (picture #4). Once you find the ‘entrance’ you still have to hike approximately 700 feet through the Rancho Carrillo HOA open space to reach the preserve. However, you will not make it even 40 feet down the trail before the trail comes to an end (picture #5). At that point you are forced to turn around and go back to Carrillo Way. At this point you also now facing in the general direction of the Pacific Ocean which you cannot see over the hills and houses (picture #6). From what I can tell after driving the area and using Google Earth, if you were a Billy goat you might get a peekaboo view of the Pacific Ocean from the Northeast corner of the preserve, but I can assure you very few people have ever been at that location. It is certainly not a scenic vista. I have asked many people in the area if they had heard of this preserve and no one had. Based on my experience (picture #6) this preserve has clearly not been accessed in a very long time and yet this area was chosen as a scenic vista of the Pacific Ocean. The bottom line is there is no discussion in the IS why the four preserves were chosen as potential scenic vistas and yet at least one other, Simmons Family Park, which should have been an obvious choice for a scenic vista, at least to people living in the Carlsbad, Vista, and San Marcos area, was left of the list of scenic vistas. This is a prime example of why the analysis by the IS was incomplete and inadequate.

In summary both selections in segment 2 that were evaluated for their scenic view to determine whether the aesthetics of the environment were significantly impacted were both evaluated incorrectly evaluated. A portion of Rancho La Costa Preserve does run east of the Project and the IS should have realized the Project is west of that portion of Rancho La Costa and even goes directly under segment 2. The IS should have also realized that Diamond Trail Preserve is not an area accessible easily by foot and its extremely limited view of the Pacific Ocean is not a scenic vista that is accessible. Additionally, the IS should have evaluated Simmons Family Park which on clear evenings, typically has people enjoying the sunset over the Pacific Ocean from its hilltop scenic vista and on the Fourth of July you have to get to the park

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(cont.)

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extremely early if you want any chance of seeing west to the Pacific Ocean and forget about finding a parking space. This scenic vista is approximately 75 east of the Project which based on the criteria for visual sensitivity would be considered moderate to high if not high. In the IS original determination using KOP D it said the visual sensitivity would be moderate but all it said to explain the rating of moderate was, "Viewer sensitivity in this area is moderate, with affected viewers including residents and users of Simmons Family Park." So all it said was the affected viewers were 'residents and users of Simmons Family Park', that is not exactly an explanation of why it would be moderate. This is another example of why the IS is not a thorough analysis of whether the Project will have a significant impact on the study area. The IS did not talk about the visual quality or the viewer types and volume and the fact that according to the criteria described on page 3.1-2 of the IS that viewer types and volume should consider that "Land uses that derive value from the quality of their settings, such as parks or scenic routes, are considered particularly sensitive to changes in visual setting conditions." In other words, if Simmons Family Park had been considered as a KOP the determination of visual sensitivity would have been higher. Finally there was no discussion regarding alone viewer exposure. All three of these criteria are supposed to be considered in determining the overall visual sensitivity.

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(cont.)

Which brings me to another point, the selection and treatment of the KOPs within segment 2. The two KOPs that were specifically showed a camera angle and field of view that downplayed the impact of the power lines while highlighting items such as street lights or the water tank as well as shooting uphill which minimizes the more distant poles as was explained in KOP C. If the KOP had been from Simmons Family Park (pictures #2 and #3) or the crest of Coast Avenue (picture #16), the most scenic portion of the main drive through the community, not going up White Sands as SDG&E chose to use as their KOP and then the IS decided to go with what SDG&E had already done rather than look at the community and realize that there were two other KOPs that would have been superior to see the real impact of the Project. If either of those KOP would have been evaluated and then analyzed cumulatively I believe the only possible determination of the impact of the Project on the aesthetics of the environment would have had to be significant.

I3-10

In closing, I think a story that was shared with me by one of my neighbors describes the feeling of many of the community members impacted by the Project, particularly along segment 2. The story goes like this. A couple of years ago my neighbor's brother came from out of state to visit her. He had never been to Southern California and when he arrived, he commented on how beautiful it was with the ocean and the rolling hills and all the lush landscape. After a couple of days of enjoying the beach etc. he finally said to her, you live in such a beautiful part of the country, but why did you pick a house so close to those big power lines. She turned to him and said, "I didn't." They brother looked back at her and said, "What do you mean you didn't move next to those power lines?" She turned to him and said, "They moved next to me." She went on to explain that when she moved into the neighborhood back in 2001 those towering steel structures did not exist, there were only small discreet wooden structures that you barely noticed until one day back in 2010 I came home and here were these gigantic monolithic steel structures standing where the almost unnoticeable wooden structures once stood. That is the cumulative impact the current Project in conjunction with the STEP project has had on this community. The aesthetic nature of what we all moved into has already been damaged and allowing the Project to be built will make the cumulative impact much worse. I tell people that when I moved into this neighborhood the wooden power lines were like the two-way neighborhood street. When the current steel towers were installed it felt like we were now living on a four lane arterial road. If the proposed Project were to be built with the two parallel sets of looming steel poles and what would be a total of 15 wires compared to the three wires on the wooden poles and lines it will be like living on a freeway and no one wants to live on a freeway. The few that do at least typically have tall wall built to keep out the sights and sound. Unfortunately, that is not an option if the Project is constructed.

I3-11

In closing, as I cited earlier in (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68) given a “fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.” I definitely believe base on my analysis as well as others including the City of San Marcos staff, the many hundreds of residents in the study area who have submitted comments (including some who work in the environmental sciences area) that preparation of an EIR is warranted and should be prepared before final approval is granted for SDG&E’s TL6975 transmission line project.

I3-12

Other observations, questions, and comments:

It is not my intent to pick apart the IS or the process involved in preparing the IS; however, there are many mistakes/inaccuracies/discrepancies within the document. This list is compiled primarily from section 3.1 of the IS. I am also listing some comments that did not really fit my narrative above but are important considerations.

- Table 3.21-1 lists 44 projects used in the cumulative impact portion of the IS. The list shows under the category “Status/Construction End Date” four projects that were completed in 2016, two in 2017, and six in 2018 and the rest gave the status saying things such as TBD or In Progress or Under Construction or Unknown or Under Review etc. However as just one example, one of the projects shown to have an end date of 2017 is not even close to being completed. My point is even in the projects they show as having been completed is not correct and if you are going to make a table such as this one it should be verified.
- On page 3.1-15 under 3.1.4 “Environmental Impacts - Methodology” for analyzing the impact on Aesthetics, it says “The Project is not located an urbanized area, as defined in CEQA Guidelines Section 15387, and as mapped by the U.S. Census1. Therefore, this analysis is based on the Project being in a nonurbanized area.” That said on the following pages this is how the IS describes the Project.
 - o On Page 3.1.1 – “1. AESTHETICS — Would the project: c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?” What is interesting about this wording is in the original PEA on page 4.1-1 for this question it uses the exact wording from the CEQA guidelines under Appendix G which states “(c) Substantially degrade the existing visual character or quality of the site and its surroundings?” And yet in in the IS a complete sentence was added regarding projects that are in an urbanized area and yet as cited above this project is not being analyzed as being in an urban area. So why was that sentence added when it is not applicable for this Project?
 - o Page 3.1-2 – “The study area is comprised of urban/developed land, orchards/vineyards, intensive agricultural areas, coastal sage scrub, chaparral, grasslands, wetlands, marshes, riparian forests, woodlands, and freshwater areas.”
 - o Page 3.1-2 - “The majority of Segment 1 is adjacent to San Marcos Boulevard, as well as commercial, industrial, and residential development in an urban area.”
 - o Page 3.1-3 – “**Light and Glare.** Much of the Project study area is comprised of developed and urbanized lands where nighttime lighting is part of the built environment, which includes vehicle headlights, street lighting, parking lot lighting, security lighting, building lighting, as well as various other sources of light from surrounding commercial, industrial, and residential uses.”
 - o Page 3.1-5 – “The San Marcos Substation (VP 1) is located on a 1.87-acre industrial site within an urbanized area of the City of San Marcos.
 - o Page 3.21-10 – “Regarding light and glare, the summary of existing conditions notes that much of the Project area is developed and urbanized lands where nighttime lighting (e.g., from vehicle headlights, street lighting, parking lot lighting, security lighting, and building illumination) is part of the built environment.”
- Page 3.1-3 - *Scenic Vistas*. There are no officially designated scenic vistas in the study area. However, scenic views are available from informal recreation areas in Rancho La Costa Preserve, Diamond Trail Preserve, and Escondido Creek Preserve.” However, on page 3.1-17 in table 3.1-3 a fourth scenic vista, ‘Sage Hill Preserve’ appears on the list, without any reason given.

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- Page 3.1-5 – “Segment 1 is approximately 1.8 miles long and includes a single-circuit, 69 kV transmission line on wooden poles ranging from 20 to 83 feet tall. It runs north past the St. Mark’s Golf Club”. This is not true, there are a number, approximately 8 steel poles that are now part of segment 1 and in fact four of the wooden poles that were in the one section of segment 1 that is in a higher fire risk area (although not in a very high fire risk area) have already been replaced with steel poles.
- Page 3.1-8 “Segment 2 is approximately 2.8 miles long and includes an existing single-circuit, 138 kV transmission line on steel poles approximately 68 to 109 feet tall.” This is incorrect, Segment 2 consists of a double circuit of 138 kV transmission lines.
- Page 3.1-10 - KOP E “The existing power line, street lighting, and dense residential development makes the visual sensitivity at KOP E moderate.” There is no reason given why this area of San Elijo Hills is considered a ‘dense residential development’. What is this based on? Page 3.1-14 states, “State Route 78 is designated by the City of San Marcos as a view corridor and eligible as a State Scenic Highway (City of San Marcos, 2013).” However, on page 3.1-2 the IS says, “*Scenic Highways*. There are no highways within 1 mile of the Project that are designated or eligible for State scenic designation by the California Department of Transportation Highway is I-5, approximately 5 miles west of the Project (Caltrans, 2011).” It could be Route 78 was designated a view corridor and eligible as a State Scenic Highway since 2001 which is the date on the citation of the quotation, but why is it stated differently in two places, which is correct?
- Page 3.1-12 says there are no highways within 1 mile of the Project and yet Route 78 comes within 0.25 miles of the Project.
- Page 3.1-15 says, “Field observations were conducted on April 11, 2018 to document existing visual conditions and to document potentially affected sensitive viewing locations.” But there is no mention of where those field observations occurred. Did they experience the view from scenic hiking trails in the Rancho Carrillo HOA preserve? Did they experience the view from Coast Avenue? It is not listed anywhere in the IS? Did they experience the view from Simmons Family Park? The park is mentioned in the IS but there is no reference to documenting the existing visual conditions. Did they drive down Melrose road along Segment 2? Did they drive along Rancho Santa Fe and document the existing visual conditions? Did they walk along the scenic hiking trails in Rancho La Costa Preserve bordering San Elijo Hills? This is more evidence that the IS was not thorough or complete and the finding that there are no significant impacts that cannot be mitigated is lacking.
- Page 3.1-17 says, “The KOP locations were selected to represent views seen by the largest number of public viewers; for this Project, such locations are located within public portions of residential areas and along public roadways.” But this is not true because KOP E is seen by almost no one. It is at the end of a cl-de-sac in San Elijo Hills and that cul-de-sac is not anywhere near the center of San Elijo Hills where the majority of the traffic is. This cul-de-sac fits the classic definition of a quiet neighborhood, not an area where the largest number of people drive through. Especially compared to Simmons Family Park which attracts people from all around North County to experience the scenic vista of the Pacific Ocean. Or Coast Avenue which is the primary artery through the Rancho Dorado community and another scenic vista when driving west through the neighborhood. For the area closer to San Elijo Hills driving south on Melrose would have been a much better selection as a KOP. Melrose is a major artery for San Elijo Hills and as seen in this picture definitely has a scenic view of what I call ‘Mini’ Half Dome (picture #8). Finally even the scenic hiking trails that run just west of KOP E would have been a better choice to represent the impact the Project would have on the study area.
- Page 3.1-19 says, “Viewer sensitivity in this area is low to moderate, given its developed visual nature. Affected viewers would include motorists, retail workers, shoppers, and recreationalists at San Marcos High School. The motorists, retail workers, and shoppers are transient viewers and would be less sensitive to visual changes. However, the recreationalists at San Marcos High School, and people watching games in the stands, would view the change for longer periods of

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time. Nonetheless, while they would be perceptible, the new poles and repositioned circuitry would not introduce a new visual element to the surroundings at KOP A.” So they are ranking the viewer sensitivity given its developed visual nature. The IS discounts the impact to the motorists, retail workers, shoppers because they are transient less sensitive to visual changes. Recreationalists, like people sitting in the stands for a couple of hours are more important than the people driving down the roads because it is only a couple of minutes. But what about the ongoing day-to-day impact of seeing those poles for about 5 minutes a day (to and from work) which comes out to a couple of hours each month or about a day’s worth of viewing per year at a minimum. I don’t believe this is a low to moderate visual change.

- There is no KOP facing east along Palomar Airport road as you enter the City of San Marcos showing the impact of these poles getting twice as tall. As was commented on during the public meeting held on April 30, 2019 at the 1:00 pm. meeting held in San Elijo Hills, it is a noticeable change in driving east from the Pacific Ocean where there are no transmission lines alongside the road for the first 6.1 miles from the ocean edge until you reach the San Marcos City border where suddenly you are greeted with TL680 (segment 1) which travels primarily along San Marcos Blvd until it turns up Discovery Street for the last quarter of a mile stretch to the San Marcos substation. It gives the viewer a sense that the physical environment of the City of San Marcos is worth less and not considered as important as Carlsbad. Now the Project is going to amplify this issue.
- Page 3.21-2 says, “CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project’s incremental contribution to a significant cumulative effect is “cumulatively considerable.” This means that the project’s incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. An incremental, project specific contribution to a cumulative impact is less than cumulatively considerable and is not significant if, for example, the project is required to implement or fund its fair share of a mitigation measure(s) designed to alleviate the cumulative impact.” This is the wrong section of CEQA to be quoting. This section is under Article 9. Contents of Environmental Impact Reports. Since this is an Initial Study there are sections regarding Cumulative Impact there as well but it is under 15064 (h). Citing incorrect sections of CEQA is troubling because I don’t know what else is problematic.
- I am submitting as more examples of the significant change that has occurred along segment 2 since 2010 pictures facing north up White Sands drive. Picture #33 is an actual picture taken on March 20, 2010. Pictures #34, #35, and #36 show the cumulative impact from before 2010, to the current situation (#35), to a simulated future showing two sets of steel power poles and lines (#36). The change is so profound that in the pre-2010 pictures you can barely see the wooden poles. You almost have to be shown where the wooden poles are to see them. Unlike the current steel pole and even more so after completion of the Project.

I3-22
(cont.)

I3-23

I3-24

I3-25

From: Dr. Robert H. Pack
1260 Summit Point Way
San Marcos, CA 92078

To: California Public Utilities Commission
Attn: San Marcos-Escondido TL6975
c/o David D. Davis, AICP
Environmental Science Associates
1425 N. McDowell Blvd. Ste. 200
Petaluma, CA 94954

Date: May 30, 2019

There is a major discrepancy between the PEA and the IS. The PEA says the Project in segment 2 will be offset 50 feet to the east of the current poles and power lines. However, in the IS it says the Project will be offset 30 feet to the east of the existing poles and power lines. Based on what I have found out to this point 30 feet is not a typo, yet neither entity, ESA who prepared the IS or SDG&E say they changed the offset from 50 feet to 30 feet. I hope to eventually get an answer but it gives me pause regarding this process.

First, as background in at least eight places (see below for listing) within the IS it says the new 69kV transmission line along segment 2 will be 30 east of the existing transmission lines (TL13811 and 13825) and nowhere in the IS does it say the Project will be offset 50 feet east of the existing transmission lines yet in SDG&E's PEA it says in numerous places (too many to cite) the new transmission line in segment 2 will be 50 feet east of the current transmission line not 30 feet. In fact SDG&E's maps that were used in the PEA are all drawn to scale showing that distance and those same maps were used by ESA and cited as obtaining the maps from SDG&E in the IS. In the "Appendix A – Route Mapbook" to the IS the map shows the offset of 50 feet, so ESA did not change the route maps from SDG&E even though it changed the offset distance to 30 feet from 50 feet throughout the IS. When I asked the project manager from Environmental Science Associates about this discrepancy at the April 30, 2019 public meeting in San Elijo Hills after his presentation, he said he did not know the reason for the discrepancy. I asked if it could have been a typo, but he did not know but he would check and get back to me. He had not gotten back to me after a couple of days so I emailed him directly and then realized I should have included Joyce Steingass, project manager for the CPUC for TL6975. So I sent her an email as well, Cc:ing Dave Davis. Here are my emails between Dave Davis and Joyce Steingass and myself. I started by asking Dave Davis who is the project manager for ESA who prepared the IS for the CPUC the following.

I am highlighting in green the sections pertinent to the discussion about the change in offset from 50 to 30 feet to make it easier to follow.

Robert

Thu, May
2, 9:34 PM

to DDavis

Hi Dave,

It was nice you meet you in person Tuesday night when you and your team came down to San Marcos.

I3-26

I had a couple of questions.

1) Regarding process. I am not sure of the process after May 30. If I understand correctly, after May 30 you and your team will either write a final version of the MND and send it on to the CPUC and the ALJ for their consideration or you will recommend an EIR? Is that how it works?

Or do you write a final MND either way and it is really just a matter of which box gets checked by Joyce on the document labeled "Executive Summary - Environmental Determination" on page 18 of the IS/MND and which box she checks will be based on your final recommendation? ie. in the IS/MND Joyce checked the second box, and in the final it will either be the second box or the third box. Is that correct?

Since Joyce signs that determination does that mean she makes the ultimate decision and could agree or disagree with your recommendation?

Based on the wording, you don't have to deem any of the 20 CEQA factors as significant to recommend an EIR, just that they MAY be significant, is that correct? I did not make a big deal about that the other night with my neighbors, but for me that makes the bar for recommending an EIR much, much lower. Am I correct?

If an EIR is recommended to the CPUC would your company do it or would it be a different company?

I am just trying to understand next steps and what to expect.

2) I asked you about the fact that the offset of the second set of steel power line poles in segment 2 is 30 ft. in the IS/MND but it was 50 ft in the PEA. You said you would check why that happened. If it was a typo or intentional. If it was intentional, why it was changed to 30 ft from 50 ft.?

3) I had requested a copy of the sign in list from the two meeting on April 30. You said you would check on that as well. I would appreciate a copy as soon as it is available. I would be more than happy with just a photocopy of the list, but a digital copy would be nice as well.

Thanks again for coming all the way down to San Marcos to hear our concerns. I really does mean a lot and I am sorry about the way some of the residents treated you guys. You did not deserve it, they just did not realize your role in this process and were obviously taking out their frustrations on you, sorry.

Sincerely,

Robert

I3-26

After I sent the email I realized I should have Cc:ed Joyce Steingass since she is the project manager for this proceedings for the CPUC. So I sent the following email.

Robert

Thu, May
2, 9:54 PM

to Joyce, DDavis

Hi Joyce,

I just realized I should have Cc:ed you in the email I just sent to Dave.

As I said to Dave, it was really nice to meet you face to face.

Regarding the email, the first question is probably one I should have asked you instead of Dave, but between the two of you I know you have the answer.

If it is the same for the other two questions feel free to respond as well.

Thanks again for coming down here Tuesday.

Robert

Six days later Joyce replied saying,

I3-26

Steingass, Joyce

Wed, May
8, 5:31 PM

to me, Dave

We were pleased to meet you in person as well. Thank you for welcoming us to your community.

I am writing to address your emailed questions. To ensure that your inquiries are captured and responded to within the context of the proceedings for this project, we encourage you to submit them through the process provided on CPUC's project website, through our Public Advisor's Office, or through your capacity as a party to the proceedings.

After May 30 the CPUC team will either:

- a) Write a final version of the MND and send it on to the CPUC and the ALJ for their consideration or
- b) Recommend an EIR.

The Commissioners will make the final decision.

CEQA requires an EIR if there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment.

The offset in Segment 2 would be 30 feet, as described in the IS/MND.

Pursuant to the Information Practices Act of 1977 (Cal. Civ. Code §1798 et seq.), CPUC is not in a position to release the sign-in sheets from the public meetings.

Kind regards,

Joyce Steingass

Based on Joyce's response the offset was clearly meant to be 30 feet now not 50 feet and it was not a typo so I pursued to ask why it was changed to 30 feet from 50 feet with the following email.

Robert

Wed, May
8, 5:39 PM

to Joyce

Hi Joyce,

Thanks for your response.

Did you find out why the offset in segment 2 was changed from 50 feet in the PEA and SDG&E's application to 30 feet in the MND?

Regarding the sign in sheet, Dave said it was a public record and would be published. Are you saying according to the Information Practices Act of 1977 (Cal. Civ. Code §1798 et seq.), those sign in sheets will never be made public? If that is the case, is it possible to at least get a total count of the number of people who signed in at each meeting.

Thanks again for your help and support through this process and for answering my questions.

Robert

Steingass, Joyce

Wed, May
8, 5:47 PM

to me

Our Commission is required to follow the Information Practices Act. It contains restraints from releasing personal information.

I heard that about 140 attended the afternoon meeting and at least 120 at the evening meeting.

Joyce

Since she did not answer my question about why the offset was changed from 50 to 30 feet I asked again.

Wed, May 8, 6:38 PM

to Joyce

Thanks.

What about why the offset was changed from 50 feet to 30 feet?

Steingass, Joyce

Thu, May
9, 7:29 AM

I3-26

to me

I answered the question in the first reply. See yellow highlighted excerpt below.

To ensure that your inquiries are captured and responded to within the context of the proceedings for this project, we encourage you to submit them through the process provided on CPUC's project website, through our Public Advisor's Office, or through your capacity as a party to the proceedings.

Joyce

To me this was not a response to my question of why the offset was changed. So I followed up with

Robert

Thu, May
9, 8:14 AM

to Joyce

Hi Joyce,

Sorry, I did not know that part of your answer applied to that particular question because it seemed like you answered all of the rest of my questions.

As far as getting my questions answered you said I should use the "process provided on CPUC's project website, through our Public Advisor's Office" I am not sure what that would look like. I am not sure what process you mean on the project website. I know how to ask a question as a party to the proceedings directly to SDG&E and I have done that multiple times, but since the change occurred during the writing of the MND process I was not sure SDG&E would know the reasons why since it was changed after they submitted their application and PEA. I guess I don't understand the process completely (no surprise there since I have never done this before).

So regarding the change Dave Davis said he would check on and get back to me. Should I contact him directly? Or just through SDG&E as part of a data request and hope they know the reason? Which brings me to a question I had never thought about before and perhaps what you meant as far as my options in getting the answer to that question as a party to the proceedings, can I ask a data request, like I have done with SDG&E directly to Environmental Science Associates? If so I will do that.

Thanks,

Robert

Steingass, Joyce

Fri, May
10, 3:43
PM

to me

I was endeavoring to stay neutral and objective because it puts me in a difficult position to be in the middle.

That's why I periodically recommend that you enquire with the Public Advisor's Office.

I was thinking you could pose a Data Request to SDG&E to get your question answered about the route.

Joyce Steingass | Phone: 415-703-1810 | Cell: 925-639-1896

It seemed to me that Joyce clearly wanted me to ask SDG&E why the offset was changed through my role as a party to the proceedings so I told her I had done just that but that it takes weeks to get a response and since Dave had said he would get back to me with the reason for the change in the offset distance it made sense to ask directly and that is why I was asking now. So I followed up with:

Robert

Fri, May
10, 4:01
PM

to Joyce

Understandable.

Regarding the change in the offset. I assumed this was done at the recommendation of ESA, possibly in consultation with SDG&E since SDG&E clearly recommended 50 feet in their application to the CPUC. I am asking SDG&E through the data request process but that takes two weeks and given at last week's meeting Dave did say he would check and get back to me. Should I just follow up with an email directly to him?

Thanks,

Robert

Steingass, Joyce

Fri, May
10, 4:02
PM

to me

ESA would not recommend a change like that.

Joyce Steingass | Phone: 415-703-1810 | Cell: 925-639-1896

I3-26

Robert

Fri, May
10, 4:10
PM

to Joyce

Hmm, interesting. So it had to come from SDG&E. Okay, it will be interesting to see what they have to say in their data response.

Thank you,

Robert

So in the end Joyce said ESA would not recommend a change in offset from 50 to 30 feet. So clearly it had to come at the direction of SDG&E. However, to my surprise I received the following reply from SDG&E

"QUESTION 2: Why are those new transmission lines along segment 2 now proposed to be 30 east of the existing transmission lines in the IS/MND?"

RESPONSE 2: SDG&E objects to this Request on the grounds that it is overbroad and unduly burdensome. Subject to and without waiver of their general and specific objections, SDG&E responds that SDG&E still maintains our position of the required distance of 50 feet, as described in the PEA. SDG&E takes note of the 30 feet designation within the CPUC's draft of the IS/MND and reserves its right to comment on the draft IS/MND accordingly."

Here are the eight places within the IS that refer to the 30 feet offset:

Page 2-3 Describing segment 2, "Parallel to, and 30 feet offset east of, existing 13811/13825 138 kV power line"

Page 2-10 Again describing segment 2, "The new segment would be constructed parallel to, and approximately 30 feet east of, the centerline of the existing line."

Page 2-20 "Segment 2 would have all new steel poles to accommodate a single circuit. They would range from 61 to 110 feet in height. The main line of Segment 2 would consist of 11 foundation poles and five direct-bury poles installed at the same spacing as the existing Tie Line 13811/13825 line, which the Project would parallel 30 feet to the east within the SDG&E easement."

Page 2-25 describing segment 2 "The Project would be constructed within this SDG&E corridor approximately 30 feet east of centerline of the existing Tie Line 13811/13825 structures."

Page 3.5-12 Table 3.5-1 says TL 13811/13825 is 30 feet from the new transmission lines.

Page 3.5-17 "The resource [TL13811/TL13825] is parallel to and within 30 feet of Segment 2 of the Project alignment."

Page 3.5-32 Table 3.5-2 says TL13811/TL13825 is 30 feet from the new transmission lines in segment 2.

Page 3.20-14 "Although there would be sufficient separation (30 feet) between the existing 138 kV Tie Line 13811/13825 and the Segment 2 New Build to prevent the two lines from crossing and creating an arc, due to the addition of the Segment 2 line, operation of the Project could result in a minor increase in the risk of wildland fires in the area."



1 - Rancho Dorado looking north up White Sands drive – current picture



2 - Simmons Family Park – Panoramic View looking the Pacific Ocean



3 - Simmons Family Park Sunset



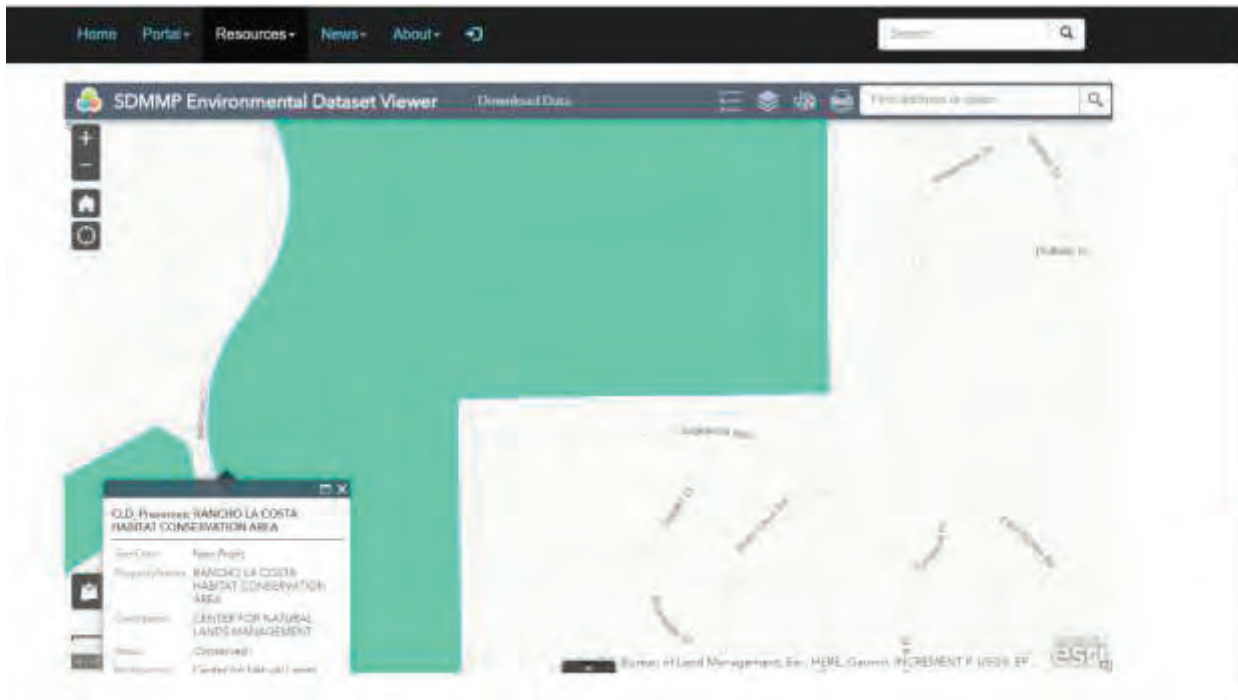
4 - 'Entrance' to a Rancho Carrillo HOA trail which leads to Diamond Trail Preserve in about 700 feet – Entrance off Carrillo Way in Carlsbad, CA.



5 – 40 feet north of the ‘entrance’ to the Rancho Carrillo HOA trail which leads to Diamond Trail Preserve trailhead. Clearly not a trail traveled often (certainly not recently)



6 – ‘Entrance’ to a Rancho Carrillo HOA trail which leads to Diamond Trail Preserve - View looking toward the Pacific Ocean. Clearly this is not a scenic view from the 40 feet of accessible trail within Diamond Trail Preserve.



7 - Rancho La Costa Preserve – Green show the preserve and it is running just west of the western border of San Elijo Hills community. In fact you can see Brookside Ct in the bottom middle which is where KOP E was taken from



8 - Mini Half Dome – Looking south on Melrose toward SEH and 'Mini Half Dome' which is located in Rancho La Costa Preserve and just west of the San Elijo Hills community



10 - Heading west on Coast Avenue – 1 of 7





12 - 3 of 7



13 - 4 of 7



14 - 5 of 7



15 - 6 of 7



16 - 7 of 7



17 - View looking almost due north to the top of Rancho Dorado - Showing Simmons Family Park at top of hill with the trees on the right side of the image. Shows the three poles located just west of Simmons Family Park and Coast Avenue would be right behind the row of homes going under the power lines just north of the closest pole. The Pacific Ocean is located directly to left in this picture.



18 – View looking down the current power lines from just south of Palomar Airport Road at the beginning of segment 2 in the Project.



19 – View looking south from Palomar Airport road at the beginning of segment 2 as well as the trailhead of the Rancho Carrillo Master HOA trail system and conservation area which goes southwest to the right of this picture.



20 – Looking southwest from Palomar Airport road down the trailhead of the Rancho Carrillo Master HOA trail system and conservation area.



21 – View looking northwest behind permanent viewing bench within the Simmons Family Park.



Shows pole #60 and steep hill



29 – Actual photo taken on March 17, 2010 of pole #59 – Looking north on Coast Avenue – Showing the wooden pole and newly installed current steel pole. This image was used to make a number of simulations because it give sizing perspective and scale.



30 – Simmons Family Park – Simulated pre-2010 based on actual photos of the wooden poles (see photo #29) for perspective and sizing.



31 - Simmons Family Park – Panoramic View looking due west to the Pacific Ocean (actual photo)



32 – Simmons Family Park – Simulated with Project



33 - View looking north down White Sands Drive – This is an original photograph taken on March 20, 2010 showing the construction of the current power lines. This is pole #55. If you look closely you can see the much smaller and discreet wooden poles that are still in place. You can also see the workers hanging from the lines. This picture was used to create image 34, 35, and 36.



34 - View looking north down White Sands Drive – Current steel pole and truck removed from original (#33)



35 – View looking north down White Sands Drive – Current Power line with wooden pole and truck removed from the original (#33)



36 - View looking north down White Sands Drive – Simulation showing second set of poles alongside the actual steel poles that are currently in place based on picture #33.

Letter I3: Robert Pack

- I3-1 Please see Master Response 1, Aesthetics, for a discussion of the selection of KOPs in the Draft IS/MND, additional KOPs evaluated in response to comments, and substantial evidence supporting CPUC's determinations. Please also see Master Response 4, CEQA Process, which describes the CPUC's decision to prepare and issue a Final Mitigated Negative Declaration. The general statements regarding scenic vistas and CEQA requirements in this comment are addressed in response to more specific comments below.
- I3-2 Please see Master Response 4, CEQA Process, for a discussion of the CEQA requirement to analyze alternatives in an EIR only, and the relevance of the SDG&E's PEA to the CPUC's CEQA process.
- I3-3 Please see Master Responses 1 and 4. Specifically, Master Response 4 describes the public outreach and information disclosure processes that CPUC has conducted to date for the Project.
- I3-4 Master Response 1 addresses comments related to the analysis of cumulative aesthetic impacts, including consideration of the existing TL 13811/13825 138 kV line (the subject of the 2010 Shadowridge Transmission Enhancement Project) within the Project Segment 2 ROW. Further, the comment suggesting the Draft IS/MND's analysis of cumulative impacts for other environmental factors is not explained or supported by evidence.
- I3-5 Master Response 1 responds to comments about views from Simmons Family Park. Two additional views have been evaluated through photos and a photo simulation to address this viewpoint (VP 5 in Final IS/MND Figure 3.1-10 and KOP XX in Final IS/MND Figure 3.1-16). The CPUC acknowledges the photo simulations presented in the commenter's pictures 30 and 32. For reasons described in Master Response 1 and in revisions to the analysis of cumulative aesthetic impacts in Chapter 3, the simulation of pre-2010 conditions shown in picture 30 is not relevant to the analysis of the aesthetic impacts attributable to the Project. The original photo (picture 31) and simulations presented are panoramic images with an unspecified vantage point, field of view, and methodology for creating the simulations. The original image appears to be taken from a drainage culvert located downhill from the playing field; no public trails are located in that area. Distortions are visible in the appearance of the existing and simulated proposed power lines bending upward in the center of the photo in pictures 31 and 32. The CPUC's analysis uses a photo simulation that was prepared using the same methodology used for the simulations presented in the Draft IS/MND, which presents a more realistic view from the accessible areas of Simmons Family Park from which the SDG&E ROW can be viewed.
- I3-6 Draft IS/MND page 3.1-3 describes how the scenic vistas were identified for analysis in the IS/MND in the absence of any officially designated scenic vistas in the study area. Please see Draft IS/MND Table 3.1-1 for a list of potentially affected viewers for each

Project component; this list includes the preserves in which Project effects on scenic vistas were evaluated.

- I3-7 The focus on long-distance views in the Draft IS/MND statement quoted in the comment refers to the definition of scenic vistas given on Draft IS/MND page 3.1-1: “generally considered to be a location from which the public can experience unique and exemplary views, which are typically from elevated vantage points that offer panoramic views of great breadth and depth.” The Quarry Trail, which is addressed in Draft IS/MND Section 3.16, Recreation, runs directly under the existing power line in San Elijo Hills because it is an SDG&E access road for maintenance of the facilities in the ROW (San Elijo Hills Community Association, 2008; City of San Marcos, 2007). The panoramic view afforded from that location would not include the Project as it would be directly overhead. Trail maps indicate that the trail branching to the east from the Quarry Trail is the Canyon Trail, also addressed in Draft IS/MND Section 3.16 (City of San Marcos, 2007). At the location where the Canyon Trail intersects the Quarry Trail within the SDG&E ROW, the elevation is about 530 feet. The Canyon Trail dips downhill to the east from that point, rising again to 530 feet in elevation approximately 0.25 mile east of the right-of-way. In the intervening portion of the Canyon Trail, no panoramic views toward the Pacific Ocean would be available due to the topography. As it approaches Windemere Road, the Canyon Trail rises to an elevation that would afford a view of the Project and existing TL 13811/13825; these facilities would be located about 0.30 mile from a viewer on the trail at that location.
- I3-8 See Response to Comment I3-6 regarding the identification of scenic vistas, and Response to Comment I3-7 regarding the definition of scenic vistas. The inclusion of Diamond Trail Preserve in the analysis, even if that preserve is lightly used, does not render the analysis inadequate, as it is only one of several examples of scenic vistas considered. Please see Master Response 1 for a discussion of aesthetic impacts from Simmons Family Park.
- I3-9 Please see Master Response 1 for a discussion of aesthetic impacts from Simmons Family Park. As explained in Draft IS/MND Section 3.1.1, the analysis defines visual sensitivity as having three factors: visual quality, viewer types/volume of use, and viewer exposure. These factors take into consideration the existing physical conditions at a given viewpoint. In the discussion of KOP D on Draft IS/MND page 3.1-8, the existing conditions were noted in the vicinity of Simmons Family Park. While existing abundant landscaping and undeveloped land were acknowledged, existing utility structures – including the aboveground water reservoir adjacent to the park – contributed to the KOP’s visual sensitivity being categorized as moderate.
- I3-10 Please see Master Response 1 for a discussion of aesthetic impacts from Simmons Family Park and Coast Avenue.
- I3-11 The comment is acknowledged, and Master Response 1 discusses the consideration of the cumulative impacts of the existing TL 13811/13825, acknowledging it as a past

cumulative project, and Segment 2 of the Project. See also Chapter 3 of this Final IS/MND, under the subheading “Mandatory Findings of Significance,” where clarification of the cumulative impact analysis for aesthetics is provided (i.e., via revisions to text on Draft IS/MND page 3.21-10).

- I3-12 The CPUC acknowledges this and the other comments it has receive on the Draft IS/MND. Please see Master Response 4, which describes the CPUC’s decision to prepare and issue a Final Mitigated Negative Declaration.
- I3-13 Draft IS/MND Table 3.21-1 was prepared using information gathered from local agencies in 2018 (see source notes on page 3.21-9). The status of proposed and approved projects and projects under construction naturally changes as reviews, permits, and construction are completed. The projected construction completion dates in Table 3.21-1 are based on the best available information when prepared, as cited. In response to comments from the public and the City of San Marcos, Table 3.21-1 has been revised to specify that the SDG&E TL 13811/13825 Shadowridge Transmission Enhancement Project is considered as a past cumulative project; however, as relevant to each of the environmental topics discussed in the Draft IS/MND, this past project was indeed considered in the cumulative effects analysis in Section 3.21, Mandatory Findings of Significance. Additional updates to this table would not have affected the analysis of cumulative impacts; however, based on input received from the City of San Marcos about projects within their jurisdiction, this table in Chapter 3, Revisions to the IS/MND, has been updated. None of those updates results in substantive changes to the cumulative impact analysis.
- I3-14 SDG&E’s PEA was submitted to the CPUC in November 2017. At that time, the California Governor’s Office of Planning and Research (OPR) had just issued its comprehensive Proposed Updates to the CEQA Guidelines (including the Appendix G checklist questions) for public review (OPR, 2017), and the revisions had not been adopted. Thus, SDG&E’s PEA relied on the Appendix G checklist question language that was in effect in 2017. As stated on Draft IS/MND page 1-2, the IS/MND uses the Appendix G checklist questions set forth in the adopted CEQA Guidelines amendments that became effective in December 2018 (Natural Resources Agency, 2018), several months prior to publication of the Draft IS/MND (except as noted in the Transportation analysis). The checklist question relating to visual character and quality was updated in those amendments, and the Draft IS/MND is consistent with current CEQA Guidelines.

In the 2018 update to the CEQA Guidelines, Appendix G Section I, Question c asks whether the Project would:

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Natural Resources Agency, 2018, p. 54)

This differs slightly from the text in OPR's 2017 proposed updates. The question on Draft IS/MND page 3.1-1 has been revised to reflect the adopted 2018 language, with the parenthetical definition of public views omitted for brevity. However, this does not have any substantive effect on the analysis.

CEQA Guidelines Section 15387 defines an urbanized area as "a central city or group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile" and indicates that a lead agency can make this determination by examining the population of the Project area or by referring to the U.S. Census Bureau's urbanized area maps.

A review of the 2010 Urbanized Area Reference Map for San Diego indicates that much of the Project would be within an urbanized area (U.S. Census Bureau, 2010); additionally, the City of San Marcos and surrounding cities and unincorporated areas have population densities greater than 1,000 persons per square mile. Therefore, the first two sentences of Draft IS/MND Section 3.1.4 under Methodology have been deleted. The following text has been added to the Discussion section under Question c beginning on Draft IS/MND page 3.1-18.

Portions of the Project are located an urbanized area, as defined in CEQA Guidelines Section 15387, and as mapped by the U.S. Census (U.S. Census Bureau, 2010). However, as described in Section 3.1.2, the CPUC does not consider local zoning and other regulations governing scenic quality to be "applicable" as that term is used in CEQA. This analysis addresses potential conflicts with local general plans and zoning, but in the absence of applicable regulations, also considers whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Additionally, the following reference is added in Section 3.1:

U.S. Census Bureau, 2010. 2010 Census - Urbanized Area Reference Map: San Diego, CA. Available online at: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua78661_san_diego_ca/DC10UA78661.pdf.

The comment's references to other locations where the Project area is described qualitatively as "urban" or "urbanized" are consistent with these clarifications, and the impact analysis has not changed as a result of these clarifications.

- I3-15 The comment is acknowledged, and does not identify any inadequacy or inaccuracy in the Draft IS/MND. No revisions have been made.
- I3-16 The first sentence under Segment 1 on Draft IS/MND page 3.1-5 has been revised to clarify that the existing 69 kV transmission line is "primarily on wooden poles ranging from 20 to 83 feet tall." This clarification does not affect the analysis, which correctly indicates that all existing wood poles in Segment 1 would be replaced with steel poles.

- I3-17 The first sentence under Segment 2 on Draft IS/MND page 3.1-8 has been revised to clarify that the existing 138 kV transmission line is a double-circuit line. This clarification does not affect the analysis; as this existing line would not be affected by the Project.
- I3-18 The characterization of the residential development visible from KOP E is a qualitative assessment of the visual character of closely situated single-family homes.
- I3-19 Both of the quoted statements are correct, and refer to different agencies' authorities to nominate or designate scenic highways. The discussion on Draft IS/MND page 3.1-14 refers to the City of San Marcos' identification of eligibility of state highways as State Scenic Highways. These local designations are suggestions and are not binding on the California Department of Transportation (Caltrans), but do indicate a local jurisdiction's interest in protecting the scenic quality of such highways. The discussion on Draft IS/MND page 3.1-2 refers to officially designated or eligible State Scenic Highways. The California State Scenic Highway program and nomination and designation processes are briefly described on Draft IS/MND page 3.1-12. Additional information on is provided on Caltrans' website at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/lap-liv-i-scenic-highways-faq2>.

Relatedly, the statement on page 3.1-12 refers to State Scenic Highways. State Route 78 in the Project area is not an eligible or officially designated State Scenic Highway. The citation has been corrected as follows:

The nearest State Scenic Highway of any status is I-5 (an eligible State Scenic Highway) which is approximately 5 miles to the west of Segment 2 of the Project (Caltrans, ~~2018~~ 2017).

Additionally, the following reference has been added to Section 3.1:

Caltrans, 2017. List of eligible and officially designated State Scenic Highways. <https://dot.ca.gov/-/media/dot-media/programs/design/documents/2017-03-desigandeligible-a11y.xlsx>. Accessed August 22, 2019.

- I3-20 The April 11, 2018, field reconnaissance was conducted from publicly-accessible locations along the entire Project alignment. This reconnaissance included a review of data provided by SDG&E for independent verification by CPUC, as noted in Response to Comment I3-6. Viewpoints from public roadways along the Project alignment included West San Marcos Boulevard/Palomar Airport Road, White Sands Drive, Rivercrest Road, Questhaven Road and Citracado Parkway. While not all streets listed in this comment were physically reviewed during that field reconnaissance, those visited are representative of the area. Viewpoints from the Rancho Carillo and Rancho La Costa preserves were not evaluated. Views from the Rancho Carillo Preserve would be approximately 0.60 mile distant looking to the east and northeast. It is noted that many of the trails in this preserve are tree-lined, which would limit views to areas outside the preserve boundaries. Views from the higher points in the Rancho La Costa Preserve

would be approximately 0.70 mile distant looking to the northeast and would include residential development and utility lines already contributing to the visual character and quality.

Master Response 1 responds to comments about views from Simmons Family Park. As further described in Master Response 1, an additional KOP has been evaluated to address this viewpoint.

- I3-21 Please see Master Response 1 for a discussion of the selection of KOPs in the Draft IS/MND and additional KOPs evaluated in response to comments, including Simmons Family Park and Coast Avenue.
- I3-22 Please see Master Response 1 for a discussion of the approach taken for the analysis of aesthetic impacts, which focused on the physical change in the visual quality of the Project location.
- I3-23 Please see Master Response 1 for a discussion of additional KOPs evaluated in response to comments, including Palomar Airport Road. Please also see Master Response 5, Non-CEQA Issues, for a discussion of community character.
- I3-24 The reference to CEQA Guidelines Section 15130 on Draft IS/MND page 3.21-2 is revised to cite CEQA Guidelines Section 15064(h). This clarification is non-substantive, but is made in the interest of accuracy.
- I3-25 Please see Master Response 1 regarding the analysis of cumulative aesthetic impacts in Segment 2. For reasons described in Master Response 1 and in revisions to the analysis of cumulative aesthetic impacts in Chapter 3, the simulation of pre-2010 conditions shown in picture 34 is not relevant to the analysis of the aesthetic impacts attributable to the Project. The CPUC acknowledges the photo simulation of the Project in picture 36; however, the original photo (picture 33) and simulation have an unspecified vantage point, field of view, and methodology for creating the simulations. Photo simulations based on Project design dimensions have been included in the aesthetics analysis as described therein. KOP D in Final IS/MND Figure 3.1-21 addresses views of the Project from White Sands Drive.
- I3-26 The commenter inquires about a discrepancy between the Applicants PEA and the Draft IS/MND regarding the offset of the existing transmission line (TL13811/13825) and the proposed new transmission line (TL6975). On July 9th, 2019 the CPUC clarified the discrepancy with the Applicant (SDG&E) in Data Request 9, confirming an offset distance of 50 feet between the proposed TL6975 alignment and the existing TL13811/13825. For additional details, Data Request 9 is available online at the CPUC Project website.

https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/DR9/TL6975_CPUC_ED_DR9_SDGEResponse.pdf

The following relevant sections have been updated and revised accordingly.

Section 3.5, Cultural Resources, of the Draft IS/MND states in Table 3.5-1 that TL13811/13825 and TL 13811A would be 30 feet away from the proposed new transmission line. Following the confirmation from Data Request 9, all mentions of 30 feet in the text have been revised to 50 feet. The revised 50-foot distance from the existing to the proposed new transmission line would not result in any substantial impacts to cultural resources as the existing TL13811/13825 and TL13811A is not be eligible for the California Register of Historical Resources (CRHR). Therefore, the additional expansion of 20 feet from the existing TL13811/13825 and TL13811A would not result in a more substantial impact, and the impact conclusion would remain the same for Cultural Resources in the Final IS/MND.

Section 3.20, Wildfire, of the Draft IS/MND states that the 30 feet separation between the existing TL13811/13825 and the proposed new transmission line would be sufficient. Therefore, any additional distance (i.e., 20 feet) separating the existing and proposed new transmission line would ultimately result in a reduced impact and attenuate the likelihood of the lines crossing, as discussed on Page 3.20-14 of the Wildfire section. All appropriate text has been revised for this section and the impact conclusion would remain the same for Wildfire in the Final IS/MND.

From: [Andrew PATRON](#)
 To: [TL6975SanMarcos](#)
 Subject: SDG&E San Marcos to Escondido Tie Line project 6975 69kV
 Date: Tuesday, May 7, 2019 3:47:00 PM
 Attachments: [image001.png](#)

My name is Andrew Patron and I am a resident in San Elijo hills. I am writing to convey my strong objection to SDG&E San Marcos to Escondido Tie Line project 6975 69kV.

I4-1

It is truly deplorable that there are 3 viable options including placing power lines underground and only the one project approach was reviewed (obviously this must be the least expensive approach for SDG&E). It does not take into account the overall cost to homeowners in the affected areas. This plan as reviewed (and contrary to CPUC's presentation) will have a DRAMATIC IMPACT of home values, the ability to obtain homeowners insurance, aesthetics, human health and safety, the environment and biological resources. There will also be a dramatic increase in fire hazard risk, placing thousands of residents in jeopardy. This is simply a VERY BAD IDEA when faced with the option of placing powerlines underground.

I4-2

I4-3

Let's start with aesthetics. First, the project would definitely have a substantial adverse effect on a scenic vista (Impact 3.1.a) From the selected images you have chosen to share in your report the effects are minimized, but for those of us living in the homes looking out over the project area, the views are significantly different. Adding additional huge steel poles OBVIOUSLY have a negative impact on the views. Just ask any of the 23 individuals who are members of the SDG&E management team how they feel about 30 foot tall steel poles being placed directly behind their homes. Something tells me they would agree with that it has a "substantial adverse effect" of the aesthetics of their property. Additionally, this project DOES SUBSTANTIALLY degrade the existing visual character or quality of public views of the site and its surroundings ((Impact 3.1.c) The lines run directly next to preserve land and through several communities. When you are going from small unobtrusive wooden poles to metal monstrosities there is an obvious and inescapable negative impact on the views. When you are walking on the trails around la costa and are forced to look out at a second row on hideously large high voltage lines extending as far as the eye can see along widened access roads, there is an OBVIOUS AND SUSBSTANTIAL IMPACT . This negatively impacts the aesthetics and as has a HUGE negative impact on the property values for the residents near the powerlines as well as the entire community.

I4-4

How about Air Quality and Hazardous Emissions? It is a well-established fact that power lines have been associated with an increase in ozone concentrations through a process called coronal ozone production which is also responsible for the creation of nitric oxides in the air. This simple fact was even reported by the EPA back to 1973 and has several interesting follow up studies demonstrating the effect. Therefore, it is scientifically proven that a power line can be considered a linear source of air pollution, capable of creating ozone and nitrogen oxides air pollutants. So YES in certain situations which occur regularly in Southern California, air quality is substantially adversely affected. The consequences would be quite severe for individuals with compromised respiratory systems susceptible to the irritation cause by these compounds (think Asthma and COPD).

I4-5

Biological resources? I am appalled that you would state that this will have a "less than significant" impact on any native resident or wildlife species or with established native resident or migratory wildlife corridors. That goes against everything known and published about the impact of construction on wildlife! It is well known and documented that construction such as the proposed project. It's even more important here since this plan as proposed runs directly through undeveloped land and borders La Costa preserve.

I4-6

- Causes pollution of air and the surrounding environment - Pollution of these essential resources directly impacts wildlife and has been demonstrated to be detrimental for the ecology.
- The disturbances caused by construction activities have a direct impact on the natural behavior of wildlife, impacting behavior, feeding habits and migratory paths.
- The increased access caused by widened roads will lead to increased vandalism and risk of fire since Construction work increases the risk of vandalism in eco-sensitive habitats and leads to increased stress on the local flora and fauna. Which in turn increases the risk which I will come back to later.
- The development of roads and other ancillary structures as proposed in this project poses a very serious threat to the local biodiversity. It can sometimes skewer the geographical habitat of certain species and have a direct negative impact on wildlife.

This too is common and well accepted knowledge in the industry.

I4-6
(cont.)

My biggest concerns are related to the unnecessary added risk from wildfires. Powerlines are thought to be responsible for many of the major wildfires we have seen in California in recent years. Between 2014 and 2016, PG&E reported 1051 fire incidents. In 2017, in northern California alone 17 fires were started from powerlines and now we have one of the largest in 2017 and last year, one of the worst fires in recent history with the Camp fire Destroying an entire town 10<000 structures and killing 88 people. Adding additional powerlines will definitely add additional risk for fires. For those of us living in San Elijo Hills the consequences are even more dire.

Our last major fire was the Cocos fire, and it was horrifying. We had literally minutes of notice to evacuate before we could see the flames coming over the hills on two sides. There is only one way in and out of San Elijo Hills. We left immediately and made it about 50 yards before coming to a dead stop. IT TOOK 2 HOURS TO EVACUATE OUR HOME. That was before they added the last 3 developments in our community, the entire new community at the bottom of Twin Oaks Valley road and then recently approved development of an additional 400+ housing units and commercial space in San Elijo. Now you want to add additional risk of fire RIGHT AT THE PINCH POINT? THE ONLY EXIT AVAILABLE FROM THE COMMUNITY? I'm sorry but this has to be one of the dumbest ideas I have ever heard. The potential risks to human life are unacceptable. I'd bet the risk assessment, like all risk assessments for construction projects, was done in a bubble without consideration of actual real life past experience, or the added burden on existing infrastructure from new and planned development, but this is just plain stupid. If there is one area in San Marcos that needs underground powerlines THIS IS IT!!! The cost could be mitigated somewhat by running it along existing roads, the distance is shorter than the proposed path and would avoid all of the unnecessary risks and hazards created by this plan.

I4-7

Sincerely,

Andrew P. Patron Ph.D.

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Letter I4: Andrew Patron

- I4-1 The commenter's opposition to the Project is acknowledged.
- I4-2 The CPUC acknowledges the preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
- I4-3 The CPUC acknowledges the concerns regarding property values, aesthetics, human health and safety, and biological resources. Please see Master Response 5, Non-CEQA Issues; Master Response 1, Aesthetics; and Master Response 3, EMF and Operational Noise. For all concerns regarding biological resources, refer to Section 3.4, Biological Resources in the Draft IS/MND, as well as revisions shown in Chapter 3 of this Final IS/MND.
- I4-4 Please refer to Master Response 1, Aesthetics, regarding public views (including scenic vistas and visual character and quality), and Master Response 5, Non-CEQA Issues, regarding private views.
- I4-5 The comment references a 1973 USEPA report. Although the report was not specifically cited or provided in the comment, CPUC believes the comment may refer to the USEPA's publication of "Determination of Coronal Ozone Production by High Voltage Power Transmission Lines" (Whitmore and Durfee, 1973). Although the current validity of that 45-year-old report is unknown, CPUC staff reviewed the report, which indicated that "ozone from transmission lines appear to contribute only minimally to local ozone levels in areas where concentrations of transmission and distribution lines exist." The dispersion of minimal amounts of ozone along the 4.6 miles of conductor would ensure that it would not result in a substantial exposure of sensitive receptors to ozone pollution. Please refer to Section 3.3, Air Quality in the Draft IS/MND, as well as to revisions shown in Chapter 3 of the Final IS/MND for further discussion of the human health effects of ozone.
- I4-6 Please see Draft IS/MND Section 3.4, Biological Resources, where the concerns expressed in the comment have been addressed. The majority of potential impacts on biological resources during construction and operation, such as roads and ancillary Project components, are addressed at a systematic level in SDG&E's Natural Communities Conservation Plan (NCCP) and 2017 Low-Effect Habitat Conservation Plan (HCP), as described in Section 3.4. CPUC agrees that impacts of power line construction on habitats and species can be adverse; this is acknowledged in the Draft IS/MND and addressed by implementation of the NCCP/HCP, SDG&E's Applicant-Proposed Measures, and Mitigation Measures.
- I4-7 The CPUC acknowledges the concerns regarding wildfire risk. Please see Master Response 2, Wildfire, which addresses the wildfire risk attributable to the Project and concerns regarding evacuation safety, including in light of the Cocos Fire and related evacuation. Regarding the preference for underground power lines, please see Master Response 4, CEQA Process, and Response to Comment A8-3.

Joseph Weslock
2163 Coast Avenue
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jweslock@earthlink.net

May 28, 2019

California Public Utilities Commission
c/o David D. Davis AICP
Environmental Science Associates
1425 N. McDowell Blvd., Suite 200
Petaluma, California 94954

Attn: San Marcos-Escondido TL6975

Dear Sir:

I am writing as a resident, homeowner, and taxpayer in the Rancho Dorado Community of San Marcos, California, to express my concern and objections to the proposed San Marcos-Escondido Electrical Transmission Line, Project 6975. My concerns and comments were developed following review of SDG&E's Application for a Permit to Construct the Tie Line 6975 San Marcos to Escondido Project (Application); SDG&E's Environmental Assessment; the April 2019 Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND); and participation in the April 30, 2019 Public Meeting at the City of San Marcos and the May 14 San Marcos City Council Meeting.

The Draft IS/MND erroneous and prematurely concludes that *"it has been determined that all significant environmental impacts of the Project would be avoided or reduced to below the level of significance with the incorporation of feasible mitigation measures agreed to by SDG&E."*

This is a substantial project that will have significant and long-term impact to San Marcos, California and the residents of several major communities and neighborhoods within the City. The proposed project follows a circuitous route of more than 12 miles through residential neighborhoods, nature and recreational trails, and through the highest-risk fire areas in North County San Diego. The cursory review and analysis performed as a component of the Draft IS/MND is grossly inadequate to reasonably analyze the impact the proposed project will have on

the community, particularly with respect to aesthetics and fire hazard, and fails to provide reasonable consideration or discussion of alternatives, including both a more direct (shorter) route between the two substations, or an alternate underground transmission line.

For these and other reasons, the IS/MND is erroneous, premature, insufficient and does not satisfy the requirements of CEQA. I join with thousands of my neighbors as well as Mayor Rebecca Jones and the entire City Council of San Marcos, California in voicing my objection to the inadequate, erroneous, and premature conclusions alleged in the Draft IS/MND and demand that a full Environmental Impact Report is both prudent and necessary to properly consider how the proposed project will affect the quality of the human environment.

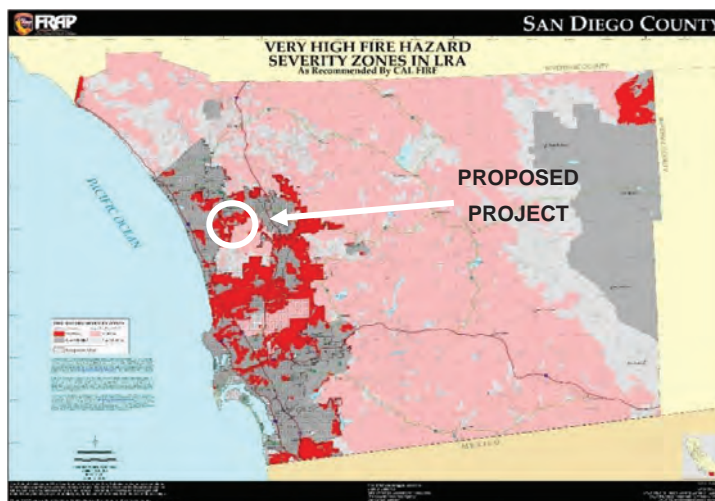
I5-1
 (cont.)

Throughout the remainder of this letter I cite specific concerns associated with fire safety, incompatible land use, and aesthetics that need to be more fully explored and addressed as a component of the EIR.

Fire Safety

The draft IS/MND is severely deficient in its analysis and evaluation of mitigation measures to address fire safety hazards associated with the proposed project.

The draft IS/MND acknowledges the proposed project runs through the highest fire risk land in the most wildfire prone state in the nation. California is the most wildfire-prone state in the Nation, with more than 2,000,000 households at high or extreme risk from wildfires – more than 5.5 times the number in the second most at-risk state.¹ Seven (7) of the most destructive wildfires in California history have occurred in the past 5



I5-2

years. A significant portion of the 12-mile project will bisect some of the largest and most densely populated communities within the City of San Marcos, including San Elijo Hills and Rancho Dorado, in areas rated by Cal-Fire as “Very High Fire Hazard.”

¹ Verisk Wildfire Risk Analysis using data from Fireline, Insurance Information Institute.

The Draft IS/MND acknowledges this with its statement that *“the majority of Segment 2 and 3 are located within a Fire Threat Zone”* (FTZ), which is defined by Cal-Fire as having an “extreme” or “very high” risk associated with wildfires.

I5-2
(cont.)

While the Draft IS/MND acknowledges the proposed construction of electric power lines is through an area identified by Cal-Fire, the CPUC, and SDG&E itself as being both prone to wildfires caused by overhead power lines and deemed to have an extreme or very high risk to life associated with such fires, it callously states, “no applicant proposed measures (AMPs) have been identified to address potential impacts related to wildfires.”²

15-3

The SDG&E Application and Draft IS/MND are completely silent with respect to evaluation of the project in context of CPUC Rule 20A, providing for conversion of overhead to underground electric lines when in the “general public interest” pursuant to criteria made by the local government. One of these criteria is specific to facilities within SDG&E’s Fire Threat zone and undergrounding is a preferred method to reduce fire risk and enhance reliability³.

15-4

The Draft IS/MND also provides contradictory and misleading information concerning the fire hazard associated with the proposed project.

On Page 3.4-42 of the IS/MND the proponent states in its evaluation of potential impact on riparian habitat or other sensitive natural communities that *“Wildfires caused by downed electric lines are rare but may occur.”* However, on page 3.20-2 of the Draft IS/MND the proponent acknowledges that *“the majority of Segment 2 and 3 are located in an area designated as Tier 2 within the High Fire-Threat District and acknowledges that “Tier 2 areas are defined as areas ‘where there is an elevated risk (including likelihood and potential impacts on people and property) from wildfires associated with overhead utility lines.”*

15-5

The IS/MND acknowledges the project has a significant impact with respect to wildfire, but errantly suggests that mitigation measures performed pursuant to a Final Project-Specific Construction Fire Prevention Plan (CFPP) will sufficiently mitigate the hazard to a less than significant impact.

15-6

² Section 3.20.3, Page 3.20-10 of April 2019 Draft IS/MND

³ <https://www.cpuc.ca.gov/General.aspx?id=4403>

The fire risk will not be mitigated at all by the proposed Project-Specific Construction Fire Prevention Plan, which is limited to SDG&E's activities during construction. The proposed mitigation measure fails to recognize or address the post-construction wildfire hazard, which is immensely greater both in potential and severity than fire hazards during construction.

I5-6
 (cont.)

The statement in the Draft IS/MND is at best, misleading, and at worst, a blatant misrepresentation of the fire hazard associated with electrical transmission lines, which are rated by Cal-Fire as one of the top causes of wildfires⁴; responsible for an even greater percentage of wildfire acreage⁵; and responsible for 4 of the 10 most destructive wildfires in California history⁶.

The fire hazard presented by the current and proposed transmission lines is not theoretical. Fire hazards are a very real and personal threat to me and my San Marcos neighbors. The risk is so immediate and significant that many of my neighbors have had carriers refuse to renew their homeowners' insurance policies and have encountered significant difficulty securing any homeowners insurance due specifically to the significant increased fire hazard created by the electric lines. Section 15382 of CEQA states that a social or economic change related to a physical change may be considered in determining whether the physical change is significant. Certainly, the inability to secure insurance on homes previously valued at more than \$1,000,000 creates a significant social and economic impact to our community.

I5-7

I have personally witnessed 3 major wildfires since making San Marcos my home in 2007. I offer the following photo taken of the October 2007 Witch Fire after it had merged with the Poomacha Fire as evidence of the very tangible concern regarding wildfires in our community. Ranked by Cal-Fire as among the 10 largest California Wildfires in history, this all-too-close-to-home disaster resulted in burning 200,000 acres – nearly 1/10th of the entire landmass in the County, destroying 1,600 homes and causing an estimated \$1.5 billion in damage and was started by power lines⁷.

I5-8

⁴ http://www.fire.ca.gov/downloads/redbooks/2015_Redbook/2015_Redbook_Fires-Acres_byCause-Detailed.pdf

⁵ http://www.fire.ca.gov/downloads/redbooks/2015_Redbook/2015_Redbook_Fires-Acres-Size_ContractCounties.pdf

⁶ http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Destruction.pdf

⁷ November 16, 2007 San Diego Union-Tribune.

This photo was taken from San Marcos' Simmons Family Park, located immediately uphill from my home, which is visible in the photo.



I5-8
(cont.)

The incomplete and contradictory statements presented within the Draft IS/MND demonstrate that insufficient analysis or care has been taken to fully evaluate whether the proposed measures will in fact sufficiently mitigate the acknowledged significant potential impact related to wildfires, not just during the construction, but for the long term during which these lines will be present. This, together with the fact that the California Department of Forestry and Fire Protection consistently ranks utility lines as one of the major causes of wildfire throughout California each year mandate that a more detailed analysis be conducted as a component of the Environmental Impact Report.

Aesthetics

CEQA requires consideration of the significant aesthetic impact the project will have on historic or cultural resources, as well as aesthetic issues and requires mitigation or avoidance of adverse aesthetic effects pursuant to other laws. CEQA also requires evaluation and mitigation of the cumulative impact of past, present, and future projects.

15-9

The proposed project runs through and adjacent to several residential communities and public recreation areas, including Simmons Family Park, which features bucolic hilltop ocean vistas, and multiple scenic hiking/nature trails.

The Draft IS/MDR stipulates there are “*no officially designated scenic vistas in the study area*” but acknowledges scenic views “are available” from “*informal*” recreation areas in Rancho La Costa Preserve, Diamond Trail Preserve, and Escondido Creek Preserve. ***This statement is incorrect and the Draft IS/MDR is inadequate in its evaluation on this matter in two points:***

(1) Rancho La Costa Preserve, Diamond Trail Preserve, Escondido Creek Preserve, as well as Simmons Family Park are official recreation areas; and,

(2) CEQA does not require or prescribe that scenic vistas be “officially designated.”

The Draft IS/MDR statement that there are “*no officially designated scenic vistas in the study area*” erroneously limits consideration of aesthetics to scenic vistas from which the public can experience unique and exemplary views from elevated vantage points that offer panoramic views of great breadth and depth, and limits consideration of scenic resources as features visible from a designated state scenic highway. These arbitrary and extremely limiting “definitions” would limit any scenery short of an unobstructed view of Yosemite National Park or the Golden Gate Bridge from consideration.

15-10

This is neither the intent nor the interpretation of CEQA. The legislative intent behind CEQA declares it is the policy of the state to, among other items, “*take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise*” and “*require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs, and to consider alternatives to proposed actions affecting the environment.*”

The courts have reinforced the legislative intent supporting a significantly more broad and general interpretation of aesthetics. ***In Mejia v. City of Los Angeles (2005), the Court ruled that the residents' opinions that the proposed project was of a size and design out of place with the neighborhood could not be dismissed from consideration and that a full EIR is required if public opinion meets the fair argument standard, regardless of the public agency's design review.***

I5-11

In callous disregard to the scenic natural and ocean-vista setting of the proposed project route, the Draft IS/MND asserts the project will have a less than significant degradation of the existing visual character or quality of public views and its surroundings. As a resident and taxpayer who made the decision to invest in a home in San Marcos in large part because of the aesthetic beauty of ocean and canyon views I find this conclusion nothing short of insulting.

The draft IS/MND also fails to consider or evaluate the cumulative impact of the proposed project, as required by CEQA. In 2009/2010, SDG&E replaced inconspicuous, small wood transmission poles with 100+ foot steel towers, that significantly damaged the aesthetics of scenic community nature trails, parks, and San Marcos communities. SDG&E never submitted its 2009/2010 project to CEQA review or public comment because it was constructed within an existing right-of-way.

This technicality does not exempt SDG&E from evaluation and consideration of the cumulative impact of its 2009/2010 project together with the proposed project. Construction of 100-foot and taller steel monoliths that bisect existing communities, transect nature trails, and obstructs or significantly diminishes the enjoyment of scenic coastal, nature, and suburban hamlet views is a significant impact, especially when considering the cumulative impact of the project with the significant aesthetic impact of SDG&E's 2009/2010 project. The Draft IS/MND fails to address the cumulative impact associated with its 2009/2010 construction.

I5-12

Furthermore, the vast majority of utility lines, especially in and adjacent to residential communities in San Marcos and adjoining North County San Diego coastal communities are underground. The City of San Marcos General Plan requires that SDG&E utilities with less than 69kv be constructed underground and the City Council notes that the Draft IS/MND fails to afford the city or public any analysis to explain why an underground construction option is not included⁸.

I5-13

⁸ May 14, 2019 City of San Marcos comment letter to CPUC objecting to the sufficiency of the Draft IS/MND.

SDG&E's project application provides virtually no analysis of the proposed project cost and none at all to alternatives. Appendix H of the Permit to Construct provides on a WAG⁹ of \$30,000,000 - \$35,000,000 for the project and notes, "All costs are approximate and based on preliminary engineering. Final costs will be determined based on approved final project scope and contracting costs."

I5-14

The draft IS/MND language is written in such a way to raise suspicion that SDG&E is attempting to sidestep its own rules for replacement of overhead with underground electric facilities, which states, in part, that: *"The Utility will, at its expense, replace its existing overhead electric facilities with underground electric facilities along public streets and roads, and on public lands and private property across which rights-of-way satisfactory to the utility have been obtained by the Utility, provided that: (amongst others) "The street or road or right-of-way adjoins or passes through a civic area or public recreation area or an area of unusual scenic interest to the general public."*¹⁰

I5-15

The proposed project crosses, impedes, and transects much of the City of San Marcos' acclaimed community parks and scenic nature trail system¹¹ as well as directly along San Marcos Boulevard and immediately adjacent to San Marcos High School – a street extensively used by the general public and which carries a heavy volume of both pedestrian and vehicular traffic.

At my own home, SDG&E's 2009/2010 power line construction (performed without CEQA review or public input) directly caused me to invest in planting large Italian cypress trees to block my previous view of the ocean. SDG&E's proposed route also bisects my neighborhood. Neither the CPUC nor SDG&E provided an opportunity for public input prior to the 2009 construction of massive transmission poles. The proposed project would create an untenable cumulative aesthetic impact that will forever diminish the scenic attributes that made San Marcos a desirable location to invest in housing, particularly when adjoining communities enjoy neighborhoods and vistas unadorned by monstrous transmission lines.

I5-16

I offer the photos on the following pages in support of my comments.

⁹ WAG is an engineering and contracting acronym: https://en.wikipedia.org/wiki/Scientific_wild-ass_guess

¹⁰ <https://www.cpuc.ca.gov/General.aspx?id=4401>

¹¹ <https://www.san-marcos.net/Home/ShowDocument?id=1474>.



View west from 2163 Coast Avenue, San Marcos, CA in 2009 and again in 2019

I5-16
(cont.)





View southwest from 2163 Coast Avenue, San Marcos, CA in 2008 and again in 2019



I5-16
(cont.)

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Ocean View from Front Yard of 2163 Coast Avenue, San Marcos, CA



I5-16
(cont.)



Scenic Nature Trail from Simmons Family Park through set-aside undeveloped land before and after construction of 100'+ electrical transmission lines

I5-16
 (cont.)

Health Affects

The Draft IS/MND states that *"This analysis does not consider Electric Magnetic Fields (EMF) in the context of the CEQA analysis of potential environmental impacts because: (1) there is no agreement among scientists that EMF creates a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risk from EMF."*

There is consensus among recognized experts, including the World Health Organization, National Cancer Institute, and National Institute of Environmental Health Sciences that there is an impact to health from EMF. According to the World Health Organization: *"It is not disputed that electromagnetic fields above certain levels can trigger biological effects. Experiments with healthy volunteers indicate that short-term exposure at the levels present in the environment or in the*

I5-17

home do not cause any apparent detrimental effects. Exposures to higher levels that might be harmful are restricted by national and international guidelines¹². “

I also note there is no regulation establishing a safe concentration of radon, which is a naturally occurring gas, yet the U.S. Environmental Protection Agency (EPA) provides guidance suggesting that indoor concentrations greater than 4 picocuries per Liter (pCi/L) should be mitigated (<https://www.epa.gov/radon>). Likewise, there is still no consensus on the human impact on climate change, or a defined or adopted standard of what constitutes “acceptable” climate change. My point is not to refute or challenge the efforts to mitigate the impact of radon or global warming, but rather to highlight these as examples of health concerns that warrant consideration, evaluation, and action in absence of a defined regulatory standard.

The absence of a scientific consensus and defined standards does not mean that no health risk is present and does not exempt the evaluation of potential significant impact to human health from the CEQA process. Rather than casually dismiss any need for evaluation of potential health impacts associated with the EMF generated by power lines, this subject should be thoughtfully discussed in a full EIR, with information about the levels of EMF generated by the proposed transmission lines and how such levels diminish at the base and at the closest residential unit.

As a final point, I am moved to comment on the community cohesion in opposition to the proposed project and demand that a full EIR be conducted. I have met more neighbors – not only from my immediate neighborhood (Rancho Dorado), but from across San Marcos, including from the San Elijo Hills community. I was and remain encouraged by the community spirit vocalized by hundreds of my neighbors, our Mayor and City Council members at the public hearings and recent City Council meeting. I applaud the commitment of Mayor Rebecca Jones and City Council Members Randy Walton, Jay Petrek, Maria Nunez, and Mayor Pro-Tem Sharon Jenkins in uniting against this proposed project and adding their voices in demanding that an EIR be conducted.

I5-17
(cont.)

I5-18

¹² (<https://www.who.int/peh-emf/about/WhatIsEMF/en/index1.html>)

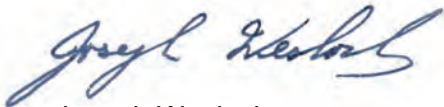
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I thank the CPUC for its commitment to hear the community and residents of California so that any decision on this proposed project will only be made after the full and detailed EIR that is warranted has been completed.

↑
I5-18
(cont.)
↓

Sincerely,



Joseph Weslock
2163 Coast Avenue
San Marcos, California 92078
jweslock@earthlink.net

cc: San Marcos City Clerk

Letter I5: Joseph Weslock

- I5-1 The CPUC acknowledges the opposition to the Project. Please see the responses below, as well as all Master Responses included in the Final IS/MND.
- I5-2 The CPUC acknowledges concerns regarding wildfire danger. Please see Master Response 2, Wildfire, which addresses the Project's location within a Very High Fire Hazard Severity Zone and the wildfire risk attributable to the Project.
- I5-3 As stated in Draft IS/MND Section 2.8, Applicant Proposed Measures (APMs) are considered part of the Project in the initial analysis; however, if – through its independent analysis and judgement – CPUC determined that any APM would not reduce or avoid substantial adverse changes in the significance of a potential impact to below the level of significance, the APM(s) have been supplemented or superseded by mitigation put forth by CPUC under its authority as lead agency pursuant to CEQA Guidelines Section 15041. In this case, the commenter noted the lack of APMs provided for Section 3.20, Wildfire in the Draft IS/MND. The CPUC conducted its own review of the Project and required the implementation of Mitigation Measure WIL-1, Fire Safety. Refer to Section 3.20, Wildfire in the Draft IS/MND for more details regarding this mitigation measure, and to Master Response 2, Wildfire, regarding operation-phase systematic approaches to wildfire prevention and suppression.
- I5-4 CPUC Rule 20A is a funding mechanism between cities and utilities and is not a mitigation option CPUC can draw on for CEQA review of proposed power line projects. Regarding undergrounding alternatives, please see Master Response 4, CEQA Process, and Response to Comment A8-3.
- I5-5 Both statements are accurate in the context in which they appear in the Draft IS/MND. Power line-related fire ignition can occur due to several causes, and downed high voltage lines – such as the lines proposed for the Project – are not a common occurrence or source of wildfire ignition. For more discussion of wildfire risk, see Master Response 2, Wildfire.
- I5-6 The Draft IS/MND acknowledges potentially significant wildfire-related impacts but concludes that these potential impacts would be reduced below the level of significance with the mitigation identified. Please see Master Response 2, Wildfire, which responds in detail to suggestions that the Draft IS/MND did not adequately analyze operational wildfire impacts.
- I5-7 Please refer to Master Response 2, Wildfire, and Master Response 5, Non-CEQA Issues, which describes how the CPUC decision-making process addresses issues such as economics and property values which are not physical environmental impacts. Please note that while Section 15382 of the CEQA Guidelines states that “[a] social or economic change related to a physical change may be considered in determining whether the physical change is significant,” it also states that “[a]n economic or social change by itself should not be considered a significant effect on the environment.” There is no

- evidence that any potential social or economic change resulting from the Project would result in a significant impact on the physical environment.
- I5-8 Please see Master Response 2, Wildfire.
- I5-9 Refer to Master Response 1, Aesthetics, for discussion of cumulative impacts regarding past, present, and future projects and additional discussion added to Section 3.21 of the Final IS/MND regarding cumulative aesthetic impacts. Additional photographs and simulations from viewpoints at Simmons Family Park are also discussed in the Master Response 1. The comment states that CEQA requires consideration of aesthetic impacts on historic and cultural resources, but does not identify any historic or cultural resources that could be affected by aesthetic impacts.
- I5-10 The Draft IS/MND does not limit its analysis of scenic views to officially designated scenic vistas – indeed, Section 3.1, Aesthetics states that the Rancho La Costa Preserve, Diamond Trail Preserve, and Escondido Creek Preserve are analyzed as scenic vistas in the absence of any locally designated vistas, as shown in Table 3.1-3. Please also see Master Response 1, Aesthetics, for additional discussion of views from Simmons Family Park.
- I5-11 In the case referenced in the comment, *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, the court concluded that the evidence supported a fair argument that the project may have a significant effect on animal wildlife and traffic. Here, there is not substantial evidence to support a fair argument that this Project would result in a significant aesthetic impact pursuant to CEQA. Please see Master Response 1, Aesthetics, and Master Response 5, Non-CEQA Issues, for discussion on public views and insurance, respectively.
- I5-12 The commenter discusses the need to evaluate the cumulative impacts of the Project in reference to a previous project constructed in 2009/2010 that replaced the wooden poles with taller steel poles (i.e., the “Shadowridge Project”). Please refer to Master Response 1, Aesthetics, for details regarding the analysis and inclusion of this project in the Final IS/MND and additional discussion added to Section 3.21 of the Final IS/MND regarding cumulative aesthetic impacts.
- I5-13 The City of San Marcos General Plan states that SDG&E utilities with *less than* 69kV shall be constructed underground. As the Project is 69kV, this would not apply. Additionally, pursuant to CPUC General Order 131-D, “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects. Distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction.” Please refer to Master Response 4, CEQA Process, for an explanation of why an underground construction option was not included in the Draft IS/MND. Additionally, see responses to comments from the City of San Marcos in Comment Letter A8, specifically Response to Comment A8-3.
- I5-14 The CPUC acknowledges this comment. This is not a comment on the CPUC’s CEQA review of the Project. Please see Master Response 4, CEQA Process, for discussion of alternatives analysis under CEQA.

- I5-15 Please see Response to Comment I5-4 regarding Rule 20A. CPUC Rule 20A is a funding mechanism between cities and utilities and is not a mitigation option CPUC can draw on for CEQA review of proposed power line projects. Regarding undergrounding alternatives, please see Master Response 4, CEQA Process, and Response to Comment A8-3. The Draft IS/MND also discloses potential impacts to recreational and community facilities in the Project area, such as those mentioned in the comment. Please refer to Draft IS/MND Sections 3.15, Public Services, and 3.16, Recreation.
- I5-16 The CPUC acknowledges the photographs provided in this comment letter, most of which depict views from a private residence, as noted in the photo captions on pages 9 through 11 of letter I5. Please see Master Response 4, CEQA Process, regarding private views and community character. The photos on page 12 of Letter I5 depict past and existing conditions at a location at Simmons Family Park. Views from Simmons Family Park, including cumulative impacts on these views, are addressed in Master Response 1 and in revisions to the analysis of aesthetics in Chapter 3 of this Final IS/MND.
- I5-17 Please see Master Response 3, EMF and Operational Noise, and Appendix C of this Final IS/MND for discussion of quantitative estimates of EMF and measures SDG&E would implement to reduce magnetic field levels caused by the Project.
- I5-18 The CPUC acknowledges the community opposition to the Project and the request for an EIR. Please see Master Response 4, CEQA Process.

2.4.3 Public Meeting Transcripts

The CPUC conducted two public meetings on April 30, 2019, to take in public comment on the Project and the Draft IS/MND. The transcripts for both meetings, with comments bracketed and coded, are provided at the end of this chapter, with responses immediately following **Table 2-3**, which lists individuals who provided oral comments at these meetings.

TABLE 2-3
LIST OF PUBLIC MEETING SPEAKERS, APRIL 30, 2019

Commenter	Comment Number(s)
San Elijo Recreation Center – 1:00 p.m.	
Laura Fratilla	PMT1-1
Robert Pack	PMT1-2 and PMT1-3
Elliot Herman	PMT1-4 through PMT1-7
David Agena	PMT1-8
Patrick Hadley	PMT1-9
Lindsey Smith	PMT1-10
Stacy Mathews	PMT1-11 through PMT1-13
Hank Ingorvate	PMT1-14 and PMT1-15
Kathryn Ericcson	PMT1-16
Glenn Pruiimm	PMT1-17 through PMT1-20

TABLE 2-3
LIST OF PUBLIC MEETING SPEAKERS, APRIL 30, 2019

Commenter	Comment Number(s)
San Elijo Recreation Center – 1:00 p.m. (cont.)	
Dusty Brazil	PMT1-21 and PMT1-22
Doug Richards	PMT1-23 and PMT1-24
Robert Dunn	PMT1-25
Tuee Hylar	PMT1-26
Beverly Jacoby	PMT1-29 through PMT1-32
Paul Cloutier	PMT1-33 and PMT1-34
James Lambert	PMT1-35 through PMT1-38
Houa Change	PMT1-39
Daryl Hunter	PMT1-40 through PMT1-43
Pat Barns	PMT1-44
Catalina Aylmer	PMT1-45 through PMT1-47
Li Tian	PMT1-48
Dana Pustinger	PMT1-50
Pantelis Vassilakis	PMT1-51 through PMT1-55
San Marcos Community Center – 6:00 p.m.	
Susan Peppler	PMT2-1 through PMT2-4
Kurt Schwend	PMT2-5 through PMT2-10
J. Lambert	PMT2-11
Jon Lycett	PMT2-12 and PMT2-13
Roberto Federico	PMT2-14
Riley Alymer	PMT2-15 through PMT2-19
Stephanie George	PMT2-20
Debra Avila	PMT2-21
Tom Primosch	PMT2-22
Edward Willis	PMT2-23
Troy Guerra	PMT2-24
Andre Allen	PMT2-25
Tiffany Lena	PMT2-26 and PMT2-27
Greg Rassatt	PMT2-28 through PMT2-31
Erick Luque	PMT2-32 through PMT2-35
Tony Beckerman	PMT2-36
Eduardo Moehlon	PMT2-37 and PMT2-38
Jason Curry	PMT2-39 through PMT2-41
Debra Tadman Paris	PMT2-42 and PMT2-43
Brian Wood	PMT2-44
Julie Herman	PMT2-45
Joe Weslock	PMT2-46

**TABLE 2-3
LIST OF PUBLIC MEETING SPEAKERS, APRIL 30, 2019**

Commenter	Comment Number(s)
San Marcos Community Center – 6:00 p.m. (cont.)	
Larry Rote	PMT2-47
Yixiong Zhou	PMT2-48 and PMT2-49
Yi Zhao	PMT2-50
Edmond Zaide	PMT2-51
Hank Ingorvate	PMT2-52 through PMT2-57
Robert Pack	PMT2-58 through PMT2-60, PMT2-63
Chantelle LaGroux	PMT2-61
Carolyn LaGroux	PMT2-62

April 30, 2019, 1:00 PM, San Elijo Hills Recreation Center

PMT1 -1 (Laura Fratilla)	The CPUC acknowledges your concerns regarding property values and human health. Please see Master Response 5, Non-CEQA Issues, and Master Response 3, EMF and Operational Noise.
PMT1-2 (Robert Pack)	The CPUC acknowledges your request for an EIR and other alternatives to the Project, as well as your preference for underground power lines. Please see Master Response 4, CEQA Process.
PMT1-3 (Robert Pack)	The CPUC acknowledges your concerns regarding aesthetics and wildfires. Please see Master Responses 1, Aesthetics and 2, Wildfire.
PMT1-4 (Elliot Herman)	The CPUC acknowledges your concerns regarding wildfires and evacuation routes. Please see Master Response 2, Wildfire.
PMT1-5 (Elliot Herman)	The CPUC acknowledges your concerns regarding insurance coverage. Please see Master Response 5, Non-CEQA Issues.
PMT-1-6 (Elliot Herman)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT1-7 (Elliot Herman)	The CPUC acknowledges your request for an EIR, preference for other alternatives, and concerns regarding human health. Please see Master Response 4, CEQA Process and Master Response 3, EMF and Operational Noise.

PMT1-8 (David Agena)	The CPUC acknowledges your interest in underground power lines and cost comparisons. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT1-9 (Patrick Hadley)	The CPUC acknowledges your concern regarding safety and wildfires. Please see Master Response 2, Wildfire.
PMT1-10 (Lindsey Smith)	The CPUC acknowledges your concerns regarding insurance, wildfire, human health, request for an EIR, and preference for underground power lines. Please see Master Response 5, Non-CEQA Issues; Master Response 2, Wildfire; Master Response 3, EMF and Operational Noise; and Master Response 4, CEQA Process, as well as Response to Comment A8-3. Refer to Section 3.20, Wildfire in the Draft IS/MND for a project-specific wildfire impact analysis.
PMT1-11 (Stacy Matthews)	The CPUC acknowledges your concern regarding wildfires. Please see Master Response 2, Wildfire.
PMT1-12 (Stacy Matthews)	The CPUC acknowledges your concern regarding human health and EMF. Please see Master Response 3, EMF and Operational Noise.
PMT1-13 (Stacy Matthews)	The CPUC acknowledges your request for an EIR and concerns regarding EMF, wildfire, and preference for underground power lines. Please see Master Response 4, CEQA Process; Master Response 3, EMF and Operational Noise; and Master Response 2, Wildfire, as well as Response to Comment A8-3.
PMT1-14 (Hank Ingorvate)	The CPUC acknowledges your concern for human health and EMF. Please see Master Response 3, EMF and Operational Noise.
PMT1-15 (Hank Ingorvate)	The CPUC acknowledges your preference for underground power lines and concern regarding insurance coverage, EMF, and wildfire. Please see Master Response 4, CEQA Process; Master Response 5, Non-CEQA Issues; 3, EMF and Operational Noise; and Master Response 2, Wildfire.
PMT1-16 (Kathryn Ericsson)	The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire. As described in the Chapter 2, Project Description, in the Draft IS/MND, following construction, helicopters would be used twice a year, once for visual inspection and once for infrared inspection. All use of helicopters within populated areas would be coordinated with the Federal Aviation Administration. Blasting is not currently

anticipated during construction of the Project; if use is required, compliance with Mitigation Measures NOI-2 and NOI-3 would be required and all blasting permits and explosive permits would be obtained by SDG&E per applicable local regulatory ordinances. No blasting is anticipated following construction of the Project. Refer to Section 2.0, Project Description for more details regarding operation and maintenance of the proposed project.

PMT1-17 (Glenn Pruijm)	The CPUC acknowledges your concern regarding aesthetics. Please see Master Response 1, Aesthetics and Section 3.1, Aesthetics, of the Draft IS/MND.
PMT1-18 (Glenn Pruijm)	The addition of third party communication facilities beyond what is currently co-located on the existing poles and towers in Segments 1 and 3 is not part of the Project. No third party communication facilities are located within SDG&E ROW in Segment 2 and none would be installed as part of the Project.
PMT1-19 (Glenn Pruijm)	The CPUC acknowledges your concern regarding safety and property values. Please see Master Response 2, Wildfire, and Master Response 5, Non-CEQA Issues.
PMT1-20 (Glenn Pruijm)	The CPUC acknowledges your concerns regarding aesthetics, city gateways, wildfire, wildlife corridors, and a preference for underground power lines. Please see Master Response 1, Aesthetics; Master Response 2, Wildfire; and Master Response 4, CEQA Process. Please also see Section 3.4, Biological Resources for a discussion and analysis of effects to wildfire corridors.
PMT1-21 (Dusty Brazil)	The CPUC acknowledges your concern regarding operational noise. Please see Master Response 3, EMF and Operational Noise.
PMT1-22 (Dusty Brazil)	The CPUC acknowledges your concern regarding wildfire and property values. Please see Master Response 2, Wildfire, and Master Response 5, Non-CEQA Issues.
PMT1-23 (Doug Richards)	The CPUC acknowledges your concerns regarding wildfire and human health. Please see Master Response 2, Wildfire, and Master Response 3, EMF and Operational Noise.
PMT1-24 (Doug Richards)	The CPUC acknowledges your concerns regarding public involvement and CEQA process. Please see Master Response 4, CEQA Process.

PMT1-25 (Robert Dunn)	The CPUC acknowledges your concerns regarding insurance coverage. Please see Master Response 5, Non-CEQA Issues.
PMT1-26 (Tuee Hyler)	The CPUC acknowledges your concerns regarding insurance coverage, wildfire, and human health. Please see Master Response 5, Non-CEQA Issues; Master Response 2, Wildfire; and Master Response 3, EMF and Operational Noise.
PMT1-27 (Audience Member)	Draft IS/MND pages 3.20-11 and 3.20-14 through 3.20-16 specifically address operation and maintenance-phase impacts. Post-construction wildfire impacts are discussed in Section 3.20, Wildfire, in the Draft IS/MND, as well as Master Response 2, Wildfire.
PMT1-28 (Audience Member)	Section 3.7, Geology, Soils, Seismicity, and Paleontological Resources, in the Draft IS/MND discusses the risk of an earthquake to occur in the Project area and the potential impacts.
PMT1-29 (Beverly Jacoby)	The CPUC acknowledges your concerns regarding proximity of the Project and aesthetics. Please see Master Response 1, Aesthetics.
PMT1-30 (Beverly Jacoby)	The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire.
PMT1-31 (Beverly Jacoby)	The CPUC acknowledges your concerns regarding property values. Please see Master Response 5, Non-CEQA Issues.
PMT1-32 (Beverly Jacoby)	The CPUC acknowledges your request for an EIR, preference for underground power lines, and concerns regarding wildfire. Please see Master Response 4, CEQA Process, and Master Response 2, Wildfire, as well as Response to Comment A8-3.
PMT1-33 (Paul Cloutier)	The CPUC acknowledges your comment regarding potential economic effects of the Project. Please see Master Response 5, Non-CEQA Issues.
PMT1-34 (Paul Cloutier)	The CPUC acknowledges your concerns regarding human behavior, noise, and potential power shut offs. In the context of this comment, the potential of this Project to become an attractive nuisance subject to random human behavior is not an environmental issue pursuant to CEQA and is outside the scope of CPUC's CEQA review. Likewise, the economic and personal effects of unscheduled power shut offs are not environmental issues pursuant to CEQA and is outside the scope of CPUC's CEQA review.

PMT1-35 (James Lambert)	The CPUC acknowledges your preference for underground power lines and concerns regarding property values. Please see Master Response 4, CEQA Process, and Master Response 5, Non-CEQA Issues, as well as Response to Comment A8-3.
PMT1-36 (James Lambert)	The CPUC acknowledges your concerns regarding human health. Please see Master Response 3, EMF and Operational Noise.
PMT1-37 (James Lambert)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT1-38 (James Lambert)	The CPUC acknowledges the comment, although it is not a comment on the adequacy or accuracy of the CEQA analysis.
PMT1-39 (Houa Chang)	The CPUC acknowledges your concerns regarding aesthetics, community character, and human health. Please see the revised analysis of aesthetics in Chapter 3, Revisions to the IS/MND, and Master Response 1, Aesthetics. Community character is addressed in Master Response 5, Non-CEQA Issues. The comment does not provide any evidence or explanation of potential Project impacts on human health.
PMT1-40 (Daryl Hunter)	The CPUC acknowledges this comment. The staging points referred to by the commenter are the locations of guard structures that would be put into place during stringing activities, as discussed in Draft IS/MND Section 2.5.5, Conductor Stringing. These guard structure sites would be located within public ROWs (i.e., roadways, sideway) and subject to local jurisdiction approval.
PMT1-41 (Daryl Hunter)	The CPUC acknowledges your concerns regarding wildfire, human health, and noise. Please see Master Response 2, Wildfire, and Master Response 3, EMF and Operational Noise.
PMT1-42 (Daryl Hunter)	The CPUC acknowledges your concerns regarding EMF. Please see Master Response 3, EMF and Operational Noise.
PMT1-43 (Daryl Hunter)	The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire.
PMT1-44 (Pat Barnes)	The CPUC acknowledges your concerns regarding wildfire and evacuation routes. Please see Master Response 2, Wildfire. The Project's objectives and purpose are discussed in Draft IS/MND Section 2.1, Introduction.

- PMT1-45 (Catalina Aylmer) Draft IS/MND Appendix B, Mailing List, identifies all libraries, public agencies (i.e., federal, State, regional, local), interested parties, schools, and community organizations to whom Project notices were sent. As applicable to the individual local jurisdiction, recipients included mayors, city managers, city clerks, community development/planning directors, and engineering/public works directors. These notices – the Notice of Intent to Adopt a Mitigated Negative Declaration, as required by CEQA – included the dates, times, and locations of both public meetings.
- PMT1-46 (Catalina Aylmer) The CPUC acknowledges your concerns regarding insurance coverage. Please see Master Response 5, Non-CEQA Issues.
- PMT1-47 (Catalina Aylmer) The CPUC acknowledges your concern regarding wildfire. Please see Master Response 2, Wildfire.
- PMT1-48 (Li Tian) The CPUC acknowledges your opposition to the Project as proposed and preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
- PMT1-49 (Audience Member) The CPUC acknowledges your concerns regarding evacuation routes. Please see Master Response 2, Wildfire, for discussion of evacuation routes.
- PMT1-50 (Dana Pustinger) The CPUC acknowledges your concerns regarding wildfire response and evacuation. Please see Master Response 2, Wildfire, for discussion of the Project’s contribution to future wildfire risk and its effects on emergency evacuations or responses.
- PMT1-51 (Pantelis Vassilakis) The CPUC acknowledges your concerns regarding economic impact to property values and quality of life. Please see Master Response 5, Non-CEQA Issues.
- PMT1-52 (Pantelis Vassilakis) The CPUC acknowledges your concerns regarding wildfire risk and resulting effects on private insurance coverage. Please see Master Response 2, Wildfire, and Draft IS/MND Section 3.20, Wildfire, regarding wildfire risk and Master Response 5, Non-CEQA Issues, regarding insurance issues.
- PMT1-53 (Pantelis Vassilakis) See Response to PMT1-52, above regarding personal financial issues.

- PMT1-54 (Pantelis Vassilakis) The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
- PMT1-55 (Pantelis Vassilakis) The CPUC acknowledges your opposition to the Project.
- PMT1-56 (Audience Member) The CPUC acknowledges the preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
- PMT1-57 (Audience Member) The CPUC acknowledges your concern regarding the CPUC's findings on wildfire. Please see Master Response 2, Wildfire, with Section 3.20, Wildfire, in the Draft IS/MND.
- PMT1-58 (Audience Member) The CPUC acknowledges your concern regarding evacuation routes and stay-in-place schools. Please see Master Response 2, Wildfire, and Response to Comment PMT1-50.
- PMT1-59 (Audience Member) The CPUC acknowledges concerns regarding wildfire evacuation. Please see Master Response 2, Wildfire, for discussion of the Project's contribution to future wildfire risk and its effects on emergency evacuations or responses.
- PMT1-60 (Audience Member) Pursuant to CEQA requirements, the CPUC has published this Final IS/MND. Those receiving notifications of the availability of the Draft IS/MND have also received notifications announcing the availability of this document. Also, those who have requested to be included on the Project's mailing have been sent notifications. Finally, the Final IS/MND is available on the CPUC's project website:

<https://www.cpuc.ca.gov/environment/info/esa/TL6975/index.html>
- PMT1-61 (Audience Member) A formal response has been drafted for each comment received on the Draft IS/MND during the public and agency review period of April 1 through May 30, 2019. These responses are present herein.
- PMT1-62 (Audience Member) The CPUC acknowledges concerns regarding wildfire evacuation. Please see Master Response 2, Wildfire, for discussion of the Project's contribution to future wildfire risk and its effects on emergency evacuations or responses.

April 30, 2019, 6:00 PM, San Marcos Community Center

PMT2-1 (Susan Peppler)	The CPUC acknowledges your concern regarding aesthetics, wildfires, and human health. Please see Master Response 1, Aesthetics; Master Response 2, Wildfire; and Master Response 3, EMF and Operational Noise.
PMT2-2 (Susan Peppler)	The CPUC acknowledges your concern regarding private insurance coverage. Please see Master Response 5, Non-CEQA Issues.
PMT2-3 (Susan Peppler)	The CPUC acknowledges concerns regarding wildfire evacuation. Please see Master Response 2, Wildfire, for discussion of the Project's contribution to future wildfire risk and its effects on emergency evacuations or responses.
PMT2-4 (Susan Peppler)	The CPUC acknowledges your preference for underground power lines, request for an EIR, and overall concerns regarding the Project. Please see Master Response 2, Wildfire; Master Response 3, EMF and Operational Noise; Master Response 4, CEQA Process; and Master Response 5, Non-CEQA Issues. Please see also Response to Comment A8-3 regarding utility undergrounding.
PMT2-5 (Kurt Schwend)	The CPUC acknowledges concerns regarding wildfire evacuation. In the context of this comment, the potential of this Project to become an attractive nuisance subject to random human behavior is not an environmental issue pursuant to CEQA and is outside the scope of CPUC's CEQA review. Please see Master Response 2, Wildfire, for discussion of the Project's contribution to future wildfire risk.
PMT2-6 (Kurt Schwend)	The CPUC acknowledges your concern the operational noise associated with power lines. Please see Master Response 3, EMF and Operational Noise.
PMT2-7 (Kurt Schwend)	The CPUC acknowledges your concern regarding the Draft IS/MND aesthetics analysis. Please see Master Response 1, Aesthetics.
PMT2-8 (Kurt Schwend)	The CPUC acknowledges your concerns regarding property values. Please see Master Response 5, Non-CEQA Issues.
PMT2-9 (Kurt Schwend)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.

PMT2-10 (Kurt Schwend)	The CPUC acknowledges your concerns regarding property values and private insurance coverage. Please see Master Response 5, Non-CEQA Issues.
PMT2-11 (J. Lambert)	The CPUC acknowledges your overall opposition to the Project preference for underground power lines. With regard to the undergrounding of utilities, please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-12 (Jon Lycett)	The CPUC acknowledges your request for an EIR, as well as your concerns on the Draft IS/MND's analysis of wildfire. Please see Master Response 2, Wildfire, and Master Response 4, CEQA Process.
PMT2-13 (Jon Lycett)	The CPUC acknowledges your preference for underground power lines and/or other alternatives, also your request for an EIR. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-14 (Roberto Federico)	The CPUC acknowledges your concerns regarding wildfire and suggestion of undergrounding utilities. Please see Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-15 (Riley Alymer)	The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire.
PMT2-16 (Riley Alymer)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-17 (Riley Alymer)	The CPUC acknowledges your concerns regarding human safety risk and the Project. In the context of this comment, the potential of this Project to have a significant impact on the physical environment due to human behavior is not within the scope of CPUC's CEQA review.
PMT2-18 (Riley Alymer)	The CPUC acknowledges your concerns regarding human health risk. Please see Master Response 3, EMF and Operational Noise.
PMT2-19 (Riley Alymer)	The CPUC acknowledges your concerns regarding wildfires and your preference for underground power lines. Please see Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.

PMT2-20 (Stephanie George)	The CPUC acknowledges your concern regarding wildfire. Please see Master Response 2, Wildfire. Draft IS/MND Appendix B, Mailing List, identifies all libraries, public agencies (i.e., federal, State, regional, local), interested parties, schools, and community organizations to whom Project notices were sent. As applicable to the individual local jurisdiction, recipients included mayors, city managers, city clerks, community development/planning directors, and engineering/public works directors. These notices – the Notice of Intent to Adopt a Mitigated Negative Declaration, as required by CEQA – included the dates, times, and locations of both public meetings, as well as information for submitting comment on the Draft IS/MND and contacting the CPUC’s Project Manager.
PMT2-21 (Debra Avila)	The CPUC acknowledges your concerns regarding EMF, human health risk, and private insurance coverage. Please see Master Response 3, EMF and Operational Noise, and Master Response 5, Non-CEQA Issues.
PMT2-22 (Tom Primosch)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding aesthetics and wildfires. Your request for an EIR is also acknowledged. Please see Master Response 1, Aesthetics; Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-23 (Edward Willis)	The CPUC acknowledges your concerns regarding cumulative aesthetic effects, wildfire risk and evacuation, and your request for an EIR and undergrounding of utilities. Please see Master Response 1, Aesthetics; Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-24 (Troy Guerra)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-25 (Andre Allen)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-26 (Tiffany Lena)	The CPUC acknowledges your concerns regarding property values. Please see Master Response 5, Non-CEQA Issues.
PMT2-27 (Tiffany Lena)	The CPUC acknowledges your concerns regarding wildfires and evacuation routes. Please see Master Response 2, Wildfire.

PMT2-28 (Greg Rassatt)	The CPUC acknowledges your request for an EIR. Please see Master Response 4, CEQA Process.
PMT2-29 (Greg Rassatt)	The CPUC acknowledges your concerns regarding aesthetics. Please see Master Response 1, Aesthetics.
PMT2-30 (Greg Rassatt)	The CPUC acknowledges your concerns regarding wildfires, health concerns, private insurance coverage, and property values. Please see Master Response 2, Wildfire; Master Response 3, EMF and Operational Noise; and Master Response 5, Non-CEQA Issues.
PMT2-31 (Greg Rassatt)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-32 (Erick Luque)	The CPUC acknowledges your request for an EIR. Please see Master Response 4, CEQA Process.
PMT2-33 (Erick Luque)	The CPUC acknowledges your concerns regarding aesthetics and property values. Please see Master Responses 1, Aesthetics, and Master Response 5, Non-CEQA Issues.
PMT2-34 (Erick Luque)	The CPUC acknowledges your concerns regarding wildfire risk. Please see Master Response 2, Wildfire.
PMT2-35 (Erick Luque)	The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-36 (Tony Beckerman)	The CPUC acknowledges your concerns regarding human health and your preference for underground power lines. Please see Master Response 3, EMF and Operational Noise; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-37 (Eduardo Moehlono)	The CPUC acknowledges your regarding wildfires and your preference for underground power lines. Please see Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-38 (Eduardo Moehlono)	The CPUC acknowledges your request for an EIR. Please see Master Response 4, CEQA Process.
PMT2-39 (Jason Curry)	The CPUC acknowledges your concerns regarding aesthetics. Please see Master Response 1, Aesthetics.

PMT2-40 (Jason Curry)	The CPUC acknowledges your concerns regarding property values and fiscal concerns. Please see Master Response 5, Non-CEQA Issues.
PMT2-41 (Jason Curry)	The CPUC acknowledges your preference for underground power lines and/or other alternatives. Your request for an EIR is also acknowledged. Please see Master Response 4, CEQA Process, and Response to Comment A8-3.
PMT2-42 (Debra Tadman Paris)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding wildfire evacuation and human health risk. Please see Master Response 2, Wildfire; Master Response 3, EMF and Operational Noise; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-43 (Debra Tadman Paris)	The CPUC acknowledges your concerns regarding EMF and human health risk. Please see Master Response 3, EMF and Operational Noise.
PMT2-44 (Brian Wood)	The CPUC acknowledges your concerns regarding aesthetics, human safety, and property values. As well as your request for an EIR. Please Master Response 1, Aesthetics; Master Response 2, Wildfire; Master Response 3, EMF and Operational Noise; Master Response 4, CEQA Process; and Master Response 5, Non-CEQA Issues.
PMT2-45 (Julie Herman)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding wildfires and evacuation routes. Please see Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-46 (Joe Weslock)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding aesthetics. Your request for an EIR is also acknowledged. Please see Master Response 1, Aesthetics; Master Response 4, CEQA Process; and Response to Comment A8-3.
PMT2-47 (Larry Rote)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding aesthetics and property values. Please see Master Response 1, Aesthetics; Master Response 4, CEQA Process; Master Response 5, Non-CEQA Issues; and Response to Comment A8-3.

PMT2-48 (Yixiong Zhou)	The CPUC acknowledges your concerns regarding wildfire. Please see Master Response 2, Wildfire.
PMT2-49 (Yixiong Zhou)	The CPUC acknowledges your preference for underground power lines, as well as your concerns regarding wildfires, private insurance coverage, and property values. Please see Master Response 2, Wildfire; Master Response 4, CEQA Process; Master Response 5, Non-CEQA Issues; and Response to Comment A8-3, regarding undergrounding utilities.
PMT2-50 (Yi Zhao)	The CPUC acknowledges your comment, although it is not a comment on the adequacy or accuracy of the CEQA analysis.
PMT2-51 (Edmond Zaide)	The CPUC acknowledges your opposition to the Project.
PMT2-52 (Hank Ingorvate)	The CPUC acknowledges your concerns regarding human health. Please see Master Response 3, EMF and Operational Noise.
PMT2-53 (Hank Ingorvate)	The CPUC acknowledges your preference for underground power lines and your concerns regarding EMF. Please see Master Response 3, EMF and Operational Noise; Master Response 4, CEQA Process; and Response to Comment A8-3, regarding undergrounding utilities.
PMT2-54 (Hank Ingorvate)	National security and risk of terrorist attack are not considered environmental impacts pursuant to CEQA. Therefore, this is beyond the lead agency's scope of environmental review in this IS/MND. The CPUC acknowledges your preference for underground power lines. Please see Master Response 4, CEQA Process, and Response to Comment A8-3, regarding undergrounding utilities.
PMT2-55 (Hank Ingorvate)	The CPUC acknowledges your concerns regarding wildfires. Please see Master Response 2, Wildfire.
PMT2-56 (Hank Ingorvate)	The CPUC acknowledges your concerns regarding private insurance coverage. Please see Master Response 5, Non-CEQA Issues.
PMT2-57 (Hank Ingorvate)	The CPUC acknowledges your concerns regarding wildlife. Please refer to the responses to comments provided for Letter A2, California Department of Fish and Wildlife; Letter A5, Center for Natural Lands Management; Letter A6, City of Carlsbad (responses A6-1 through A6-9); Letter A8, City of San Marcos (responses A8-27 through A8-29); Letter A9,

County of San Diego (responses A9-11- and A9-12); and Letter A11, San Diego Gas & Electric Company (responses A11-15 through A11-21).

- PMT2-58 (Robert Pack) The CPUC acknowledges your preference for underground power lines and alternatives, as well as your concerns regarding aesthetics and wildfire. Your request for an EIR has also been acknowledged. Please see Master Response 1, Aesthetics; Master Response 2, Wildfire; Master Response 4, CEQA Process; and Response to Comment A8-3, regarding undergrounding utilities.
- PMT2-59 (Robert Pack) The CPUC acknowledges your concerns regarding aesthetics and cumulative impacts, as well as your request for an EIR. Please see Master Response 1, Aesthetics, and Master Response 4, CEQA Process.
- PMT2-60 (Robert Pack) The CPUC acknowledges your concerns regarding aesthetics and cumulative impacts. Please see Master Response 1, Aesthetics.
- PMT2-61 (Chantelle LaGroux) The CPUC acknowledges your concerns regarding human health risk. Please see Master Response 3, EMF and Operational Noise.
- PMT2-62 (Carolyn LaGroux) The CPUC acknowledges your concerns regarding human health risk. Please see Master Response 3, EMF and Operational Noise.
- PMT2-63 (Robert Pack) The CPUC acknowledges your concerns regarding wildfires and evacuation routes. Please see Master Response 2, Wildfire.

2.4.4 Petition

A petition with 266 signatures was submitted to the CPUC on April 23, 2019. The text of the petition reads:

We request SDG&E's proposed transmission line project (TL6975) running approximately 12 miles, connecting the San Marcos substation to the Escondido substation not be built by adding additional above ground power line poles.

Instead, we propose the new transmission line be built underground as outlined in SDG&E's proposed alternative route C in SDG&E's "PROPONENT'S ENVIRONMENTAL ASSESSMENT", dated November 15, 2017 or through a combination of alternatives that SDG&E has considered that meet the project objectives.

The CPUC acknowledges the petition signers' preference for an alternative to the Project, and directs them to Master Response 4, CEQA Process, which describes the circumstances under which CPUC can analyze alternatives to a Project, as well as Response to Comment A8-3 for

further information regarding undergrounding of the Project or Project components. The full petition is provided in Final IS/MND Appendix B.3.

2.4.5 References

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<p>CALIFORNIA PUBLIC UTILITIES COMMISSION</p> <p>SDG&E San Marcos to Escondido Tie Line 6975 69kV Project</p> <p>Proposed Mitigated Negative Declaration</p> <p>1105 Elfin Forest Road San Marcos, California 92078</p> <p>Tuesday, April 30, 2019 1:00 PM to 3:00 PM</p> <p>Reported by: Cynthia J. Vega, RMR, CSR 6640, CCRR 95</p>	<p>1 MS. FRATILLA: Right. I'm just wondering why 2 it isn't. I mean, can anybody answer that question? 3 MR. MANKA: I'd like to keep rolling with 4 soliciting the comments because if we do a Q & A, we'll 5 run out of time. The administrative logic -- 6 MS. FRATILLA: How many are interested in my 7 question in here? 8 Okay. 9 MR. MANKA: So the administrative law judge can 10 consider other factors beyond just those considered in 11 CEQA in the formal proceedings. PMT1-1 (cont.) 12 AUDIENCE MEMBER: Where is the formal 13 proceedings going to be? 14 MR. MANKA: That has yet to be determined. You 15 can go on the website and find that out. 16 AUDIENCE MEMBER: The lady from the PUC, would 17 she know how there is an impact? 18 MR. MANKA: I just wanted to say following 19 Mr. Pack is Elliott Herman. 20 MS. STEINGASS: I'm willing to take that 21 question back and I can respond back to Laura with a 22 more informed response. I'll commit to doing that. 23 MR. PACK: If I start -- you know, you asked 24 the question about the undergrounding. The 25 undergrounding was proposed by SDG&E in their original</p> <p style="text-align: right;">Page 3</p>
<p>1 SAN MARCOS, CALIFORNIA 2 TUESDAY, APRIL 30, 2019, 1:00 P.M. 3 4 MR. MANKA: The first commenter here is Laura 5 Fratilla. And Laura will be followed by Robert Pack. 6 MS. FRATILLA: I'm Laura Fratilla. I'm on the 7 San Elijo Hills board. I'm the vice president. 8 I actually had a question for you. So when you 9 do an environmental impact, I understand that you look 10 at the environment, but what about what it does to the 11 community, to the people? Do you do any kind of study 12 on that, how it affects our home values, how it affects 13 the health of the residents in the area? Do you do 14 anything like that? 15 MR. DAVIS: Now, the community impact analysis 16 is not part of CEQA under statute. Under statute. 17 MS. FRATILLA: So who does that analysis for PMT1-1 18 the community impact? 19 AUDIENCE MEMBER: How come the residents aren't 20 allowed to have a say? 21 MS. FRATILLA: Do you know? You may not know. 22 I'm not trying to attack you personally. 23 MR. DAVIS: The reason I'm a little -- my teeth 24 in my mouth here, the fact that that's not part of the 25 CEQA process.</p> <p style="text-align: right;">Page 2</p>	<p>1 application. It was on page about 640. I'm serious. 2 642. 3 And it's important because they outlined an 4 alternative to build underground. However, while they 5 propose that to the PUC, the MND, which is what they 6 did, did not look at that alternative. So it was 7 proposed on November 15 of 2017 as a possible 8 alternative, but it hasn't been explored further at this 9 point. Doesn't mean it won't be, but it hasn't been 10 explored further yet, because their job was to only look 11 at the proposed project and doesn't cause what's called 12 a significant impact. 13 The keyword to everything today is PMT1-2 14 "significant." If it's not significant, then it doesn't 15 matter. It doesn't stop the project. They talked about 16 no impact, less than significant, and significant. And 17 if it's not significant, the project will proceed. 18 If there are significant problems -- he talked 19 about the 20 criteria. If any of those 20 criteria are 20 deemed significant and cannot be mitigated -- you heard 21 the word "mitigated" a lot; that means could be taken 22 care of -- then the project goes in a different 23 direction. 24 And a different direction is called an 25 environmental impact report, an EIR. And that is what</p> <p style="text-align: right;">Page 4</p>

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<p>1 I'm going to propose today and that is my request that 2 the next step of this process be that the PUC conducts 3 an environmental impact report, because if they do that, 4 they are forced by law, by CEQA guidelines, 15065(c). 5 I'm not an environmental lawyer. I just like this 6 stuff. I learn a lot. 7 Anyway, they will be required to investigate 8 the alternatives, including undergrounding. And I think 9 it's important that we don't jump to the conclusion that 10 undergrounding is the best solution, but it is an 11 alternative. 12 And as this process proceeds and they accept 13 this current proposal, which is called an MND, there 14 will be no examination of alternatives. It will just be 15 built. 16 The hope that we have as a community is that 17 they take our recommendation, which I hope that we make, 18 and propose that they do an environmental impact report 19 where the alternatives have to be evaluated. 20 Is that clear? 21 AUDIENCE MEMBER: How do you force them to do 22 that? 23 MR. MANKA: Mr. Pack, you have about a minute. 24 AUDIENCE MEMBER: I'll give up my time for him. 25 Go ahead.</p> <p style="text-align: right;">PMT1-2 (cont.)</p> <p style="text-align: center;">Page 5</p>	<p>1 body that at least one of these 20 criteria are 2 significant. And if they deem that, they will consider 3 an EIR. And that's where we're going. 4 The two criteria out of the 20 we want -- I 5 want to focus on -- sorry -- that I want to focus on -- 6 and I'm only going to barely brief over them both right 7 now because I'm out of time already -- is wildfires and 8 aesthetics, which is the impact on our community that 9 you talked about. 10 The aesthetics addresses the view, the property 11 values, et cetera. So I'm not going to have time to go 12 over either one today, but I will just say the wildfires 13 are significant. When these original lines were put in 14 for segment 2, those big giant towers that are there 15 now, these towers, when those were put in in March of 16 2010, there was no public input. There was no 17 environmental impact. There was no MND. 18 They didn't have to because -- why? Because 19 they had all their own right-of-way. But as you heard 20 said earlier, they have to acquire about a 1.2 mile 21 stretch, which comes out to about 1.2 acres of 22 right-of-way. Because of that, they have to go through 23 the process we're in today. So thank goodness they had 24 to acquire some right-of-way or we wouldn't be here 25 today.</p> <p style="text-align: right;">PMT1-3</p> <p style="text-align: center;">Page 7</p>	<p>PMT1-2 (cont.)</p>
<p>1 MR. PACK: Okay. I'm not supposed to answer 2 questions. Okay. You can email me. 3 Okay. So before I get started, my name is 4 Robert Pack. I live at 1260 Summit Point Way in Rancho 5 Dorado, a neighborhood in San Marcos. 6 And I want to thank you guys for coming down. 7 I really do. It is nice that you came down from 8 San Francisco. I know you didn't have to. 9 I think today when you hear the emotions and 10 the feelings from the people who live and work in this 11 community, you'll get a sense of what we feel. 12 Before I get started, I just want to state my 13 goal, which you can probably guess. At the end of the 14 public comment period, on May 30, I hope an order will 15 be issued to conduct an environmental impact report, an 16 EIR, of SDG&E's proposed project. This EIR can do what 17 has not been done to this point, which is a thorough and 18 complete analysis of alternative routes. That's my 19 goal. 20 I'm not going to have time, so I won't -- I'm 21 going to skip almost all of this. But I will talk about 22 why there needs to be an EIR. 23 If there are no -- of those 20 criteria, if 24 none are deemed significant, they don't have to do an 25 EIR. So our goal needs to be to convince the decision</p> <p style="text-align: center;">Page 6</p>	<p>1 I'm only going to conclude, by not talking 2 about the wildfires, to say that this is a map by Cal 3 Fire that shows the very high severe impact. And 4 notice -- what do you think this is? This is San Elijo 5 Hills. You're landlocked. You're geographically 6 encapsulated by -- this is high fire risk too. This 7 happens to be locally controlled. This is state. You 8 can't get any higher, people. 9 So my point is, we're landlocked. It's 10 dangerous. It's significant. And we need to convince 11 the board, the PUC, that this is a significant issue. 12 And if we are successful in that, they will do an EIR. 13 MR. MANKA: Thank you, Mr. Pack. 14 Elliott Herman followed by Dave Agena. 15 And I apologize for having to keep people on 16 their time, but we do want to make sure we have enough 17 time to hear everyone. We will be having another public 18 meeting this evening. It will be an exact duplicate of 19 this meeting with different people speaking. 20 MR. HERMAN: My name is Elliott Herman. I'm a 21 current resident of San Elijo Hills. I'm president of 22 the homeowners association. 23 I'd like to take this opportunity to express my 24 concerns about the proposed new power line and poles 25 that would be placed on basically two sides of</p> <p style="text-align: right;">PMT1-4</p> <p style="text-align: center;">Page 8</p>	<p>PMT1-4</p>

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<p>1 San Elijo.</p> <p>2 On Saturday's Wall Street Journal, it was</p> <p>3 reported that PG&E has a plan to prevent wildfires by</p> <p>4 shutting down the power grid. The power grid needs to</p> <p>5 be shut down because aboveground power lines are in</p> <p>6 danger of breaking in high winds in fire-prone areas.</p> <p>7 Isn't this exactly what this new line is going</p> <p>8 to do? Does the PUC really want to put SDG&E at risk</p> <p>9 for burning down San Elijo, which I would say right now</p> <p>10 estimate has about \$3 billion worth of houses.</p> <p>11 I'd like to show you some pictures. These</p> <p>12 pictures were taken five years ago almost to the day.</p> <p>13 Fire danger is not just a possibility. It's a</p> <p>14 reality here. We were lucky because the DC-10 came in,</p> <p>15 laid down a trail of fire retardant which stopped the</p> <p>16 fire from getting right over the hill right here. This</p> <p>17 is the other side of the hill that we live on. This was</p> <p>18 the fires that was behind Cal State San Marcos. Okay.</p> <p>19 This is how close it came to the houses. This is</p> <p>20 five years ago almost to the day. Almost to the day.</p> <p>21 This is another picture of when it came up to</p> <p>22 the top of the hill.</p> <p>23 And last, if you were in the houses at the</p> <p>24 time, this was me leaving my house and, quite frankly,</p> <p>25 after about 15 or 20 minutes sitting in the car, we got</p>	<p>1 first place.</p> <p>2 Let's talk about the two -- take a minute to</p> <p>3 talk about the underground route between the two</p> <p>4 substations. One of the stations is on Discovery. The</p> <p>5 other one is on Mission near the hospital. Neither one</p> <p>6 is within miles of us right now, yet we're the ones that</p> <p>7 these lines have to go by. I mean, they were not</p> <p>8 directly in between those two points.</p> <p>9 MR. MANKA: Mr. Herman, a minute.</p> <p>10 MR. HERMAN: Right now, what was not looked at</p> <p>11 in the underground section was undergrounding the wires</p> <p>12 on Discovery Street. Discovery Street is going to be</p> <p>13 rebuilt by the City of San Marcos because of the</p> <p>14 Creekside development.</p> <p>15 So it would take it all the way from where the</p> <p>16 current station is, all the way to Bent. From Bent, it</p> <p>17 is going to continue. There is a brand-new road going</p> <p>18 to be built all the way to Barham. So there will be no</p> <p>19 mitigating problems with traffic or anything building in</p> <p>20 that area. It's going to be an area anyway.</p> <p>21 Once you get to Barham at Twin Oaks, at</p> <p>22 Cal State, you're about a third of the way to the other</p> <p>23 power station. If you go down Barham about another</p> <p>24 third of the way between the two stations, you end up at</p> <p>25 the Sprinter line, and you then go down the Sprinter</p>	<p>PMT1-5 (cont.)</p>
<p>Page 9</p>	<p>Page 11</p>	<p>PMT1-6</p>
<p>1 out and basically it took hours to go out the only way</p> <p>2 we could, which is San Elijo Road to the west towards</p> <p>3 Rancho Santa Fe about 2 miles, less than 2 miles, and it</p> <p>4 took two hours. It took two hours. Quite frankly, it</p> <p>5 was a question as to whether this fire was going to come</p> <p>6 across.</p> <p>7 AUDIENCE MEMBER: So Twin Peaks was closed?</p> <p>8 MR. HERMAN: Twin Peaks going the other way was</p> <p>9 closed. There is only two ways in. That one was</p> <p>10 closed. This one took two hours to get out. And since</p> <p>11 then, there has been hundreds of new homes built in this</p> <p>12 area and a new school, all of which will need to be</p> <p>13 orderly evacuated if this was to take place.</p> <p>14 I'd like to take a minute to talk about the</p> <p>15 unintended consequences of these new power lines, and</p> <p>16 that's the cost of insurance.</p> <p>17 As president of the HOA, I hear from</p> <p>18 residents -- like I could do something about it; I wish</p> <p>19 I could -- that their fire insurance has gone up</p> <p>20 dramatically or it's been canceled, because insurance</p> <p>21 agents -- insurance companies are leaving us.</p> <p>22 AUDIENCE MEMBER: Ours was just canceled today.</p> <p>23 MR. HERMAN: It will probably cost San Elijo</p> <p>24 residents more money in additional insurance costs than</p> <p>25 it would cost SDG&E to have buried these lines in the</p>	<p>1 line and you can connect the two.</p> <p>2 Now, what would a solid underground line</p> <p>3 between the two stations do in terms of -- it would</p> <p>4 not -- there would never be a fire question and there</p> <p>5 would never be a question for liability. You would</p> <p>6 simply have a truly reliable single circuit between the</p> <p>7 two.</p> <p>8 The last thing is also this: Is what we need</p> <p>9 the PUC to do is to order SDG&E to do a complete</p> <p>10 environmental report, an EIR. The current report you</p> <p>11 say has no major issues unresolved. That's just not</p> <p>12 true. We haven't even talked about the EMFs that this</p> <p>13 thing is going to produce, which is in front of the high</p> <p>14 school. You're going to add to a situation where kids</p> <p>15 are going to be affected by that day after day. And we</p> <p>16 know EMFs create a problem for kids.</p> <p>17 And simply a complete EIR would allow for the</p> <p>18 consideration of the complete environmental impact and</p> <p>19 truly be able to give us time to look at alternative</p> <p>20 ways of building this needed circuit. Thank you.</p> <p>21 MR. MANKA: David Agena followed by Patrick</p> <p>22 Hadley.</p> <p>23 MR. AGENA: My points have already been much</p> <p>24 more articulated than I could have possibly done myself.</p> <p>25 I was only concerned about if there was any</p>	<p>PMT1-7</p> <p>PMT1-8</p>
<p>Page 10</p>	<p>Page 12</p>	

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<p>1 studies done of the cost comparison done between 2 underground and overhead wiring. And that's not within 3 their charter, I'm realizing now. So it's a moot point. PMT1-8 4 So I have nothing else to say. I will pass up (cont.) 5 my time to somebody else. 6 MR. MANKA: I will say I appreciate folks 7 passing up their time. I want to make sure I get 8 through all the cards first. I really don't want to cut 9 anybody off, but we also want to be respectful of all 10 the folks who would like to speak today. 11 So after Mr. Hadley is Lindsey Smith. 12 MR. HADLEY: Mr. Hadley. First of all, thank 13 you all for coming. Thank you guys for coming down. I 14 know it's probably a little tough crowd, but you 15 probably expected this. 16 So obviously these guys did a great job with 17 everything. I'm not going to say much new, except that 18 there is no way -- there is no way, there is no excuse, 19 there is no way that you can build these here safely. PMT1-9 20 Over 80 people died in the fires up there. 21 Everyone talks about property and that's one thing. 22 Obviously it is important, but there is a lot of people 23 condensed right here, a lot of little kids. 24 And the two of you and whoever else works with 25 you and whoever else makes this decision will have to</p> <p style="text-align: right;">Page 13</p>	<p>1 you to consider moving this infrastructure underground. 2 The federal government put out a national 3 climate assessment that predicts California's wildfires 4 will only get worse. They will get more frequent. They 5 will be larger. And they will be hotter. 6 It's time we evolve our infrastructure planning 7 and mitigate these fire risks and health hazards in our 8 community. 9 A couple months back the power to my house was 10 cut for 14 hours as a precaution during the Santa Ana 11 wind event. The traffic signals in our town center also 12 lost power and it took me over an hour to get out of our 13 community at 7:00 a.m. in the morning. PMT1-10 14 Had there been an evacuation order, an (cont.) 15 emergency requiring emergency vehicles to get into our 16 community or to a residence, they simply wouldn't have 17 been able to do so. 18 I urge you, and we as a community, we urge you 19 to please require an EIR and wildfire hazard impact 20 analysis to be completed. We urge you to build this 21 infrastructure underground or anywhere else. 22 This is significant for us. This is 23 significant. There are too many homes, there are too 24 many lives at risk to continue building our 25 infrastructure in this very high fire severity zone.</p> <p style="text-align: right;">Page 15</p>
<p>1 look those families in the eye. And really that's what 2 I wanted to say. 3 MR. MANKA: Following Lindsey Smith is Stacy 4 Matthews. 5 MS. SMITH: My name is Lindsey Smith. I am a 6 resident of Bella Vista at San Elijo Hills for almost 7 five years. And I sit on the HOA board of directors as 8 the secretary. 9 San Elijo has been classified as a very high 10 fire severity zone. It's already difficult, as Elliott 11 mentioned, for our residents to find and keep their 12 homeowners insurance because of this classification. 13 Adding additional poles and transmission lines PMT1-10 14 only increase fire risks to the homeowners. And I 15 believe it would be irresponsible to proceed with this 16 project as planned. 17 I personally can't understand how a project 18 like this in a very high fire severity zone can make it 19 this far without completing an EIR and wildfire hazards 20 impact analysis. Completing the steps should not be 21 optional. It should be mandatory. 22 We have three schools. We have just under 23 3,000 homes in San Elijo. We have two points of egress 24 for our community. The proposed aboveground lines will 25 cross over one of these points of egress. I would urge</p> <p style="text-align: right;">Page 14</p>	<p>1 Thank you. 2 MR. MANKA: Following Ms. Matthews is Hank 3 Ingorvate. 4 MS. MATTHEWS: Hi. My name is Stacy Matthews. 5 And I live at 1740 Kenwood Place in the Calistoga 6 development. We are in segment 3 of the project. 7 And what I'd like to say is -- I've got two 8 points and they pretty much have been covered here. But 9 we have a community, our little neighborhood has some 10 brand-new residents with small babies, some elderly 11 people, some people with some serious health problems, 12 and just plain old regular folks that want to be safe. 13 I think that's the big reason why a lot of 14 people moved out to San Elijo Hills is they wanted to be PMT1-11 15 in a safe sustainable community. Now we've got some 16 other issues that we've dealt with, such as fires. 17 And I think the biggest concern I have with the 18 fires is I was actually here in, I believe it was 19 probably '96 when the fires roared through here. And I 20 watched on Rancho Santa Fe Road as the fires crossed the 21 road. There were several fire trucks there and I asked 22 the firemen, I said, "Why are you doing nothing?" 23 And he said, "These flames are over 100 feet 24 high. They're higher than any of these towers. And we 25 can't do anything about it. We are just going to have</p> <p style="text-align: right;">Page 16</p>

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<p>1 to let it roar through," and it did.</p> <p>2 And we've rebuilt obviously, the community has</p> <p>3 been built. And the lines right behind my house are PMT1-11</p> <p>4 about maybe 50 to 60 feet off of our back property line (cont.)</p> <p>5 I think that's one huge concern.</p> <p>6 The other concern is the EMF output of these</p> <p>7 new lines that you are re-energizing. When we purchased</p> <p>8 our homes, we were not told that there would be new</p> <p>9 additional EMF output. I don't know what this is. I PMT1-12</p> <p>10 didn't see it in the report, the actual additional EMF</p> <p>11 output. So I'd like to know, I think everybody would</p> <p>12 like to know: What is the effect of that?</p> <p>13 And also as a resident, I'm asking, along with</p> <p>14 my community, that there definitely be an environmental</p> <p>15 impact report done to assess the additional EMF output,</p> <p>16 the effect of the fire on this community with</p> <p>17 relationship to the poles, and the cost comparison of</p> <p>18 undergrounding the lines where you can and what that</p> <p>19 cost comparison would be if you were to have power</p> <p>20 outages to four cities, multiple, you know, lawsuits. I PMT1-13</p> <p>21 can't imagine what else would happen that would increase</p> <p>22 the cost to SDG&E and the state if we had a major</p> <p>23 disaster, which I think it's not when it's going to</p> <p>24 happen, it is going to happen. We need to be prepared.</p> <p>25 And I think undergrounding is one way to look at being</p> <p style="text-align: right;">Page 17</p>	<p>1 you really have to worry about.</p> <p>2 Putting the cables underground reduces that</p> <p>3 effect of EMF. You are still going to get some of it,</p> <p>4 but, you know, you can get EMF from your cell phones.</p> <p>5 You can get it from your microwave. That's why you have</p> <p>6 that screen in front, so you are not supposed to be PMT1-14</p> <p>7 staring into the microwave. You know, so there is all (cont.)</p> <p>8 kinds of different effects, but it's much less. Okay.</p> <p>9 So putting it underground, I know we heard</p> <p>10 about the fires and everything else. That's a big</p> <p>11 concern. This past year AAA canceled our insurance</p> <p>12 because of threat of fire. We had a hell of a time PMT1-15</p> <p>13 trying to find somebody else to insure us at a good</p> <p>14 rate. This is a major concern. The EMF, fire, we've</p> <p>15 heard all of that. So that's my piece.</p> <p>16 MR. MANKA: Following is Glenn Pruim.</p> <p>17 MS. ERICSSON: There is nothing logical about</p> <p>18 this whole project. The County of San Diego has</p> <p>19 determined that my community in Rancho Dorado is a very</p> <p>20 high fire hazard zone.</p> <p>21 Segments 1 through 3 traverse through a very</p> <p>22 high density area. That's illogical too. Why is going</p> <p>23 12 miles or so through high density sensitive</p> <p>24 neighborhoods a better solution than 5.4 miles direct</p> <p>25 undergrounding. It's just not logical. PMT1-16</p> <p style="text-align: right;">Page 19</p>
<p>1 prepared.</p> <p>2 So I, again, propose the EIR report. Thank</p> <p>3 you.</p> <p>4 MR. MANKA: Following Mr. Ingorvate is Kathryn</p> <p>5 Ericsson.</p> <p>6 MR. INGORVATE: My name is Hank Ingorvate and I</p> <p>7 live at 2173 Coast Avenue.</p> <p>8 We moved in in 2001. Of course, we had the</p> <p>9 wooden power poles. And then when SDG&E came in and put</p> <p>10 up the big old iron poles, they tripled the amount of</p> <p>11 cables. And as you triple the amount of cables, you</p> <p>12 increase the EMF. And, of course, SDG&E didn't have to</p> <p>13 go through anything like this because they already had</p> <p>14 right-of-way. PMT1-14</p> <p>15 Now, if you approve this new line, they're only</p> <p>16 going to put up, what -- you said 69 kVA line?</p> <p>17 MR. DAVIS: It's a 69 kV.</p> <p>18 MR. INGORVATE: Once you give them approval</p> <p>19 that they have that route, they can triple that, and</p> <p>20 they don't have to go through this again. Okay.</p> <p>21 So what is the effect of the EMF? EMF on the</p> <p>22 power cables aboveground is when you're really close to</p> <p>23 it and get a lot of EMF, it gives you cancer, leukemia,</p> <p>24 especially young kids. And as they add more and more</p> <p>25 cables like this, you have really a health benefit that</p> <p style="text-align: right;">Page 18</p>	<p>1 How can SDG&E guarantee that those live</p> <p>2 parallel lines will not spark fires other than turning</p> <p>3 them off. It's just illogical to think that this can be</p> <p>4 mitigated. And turning them off just isn't a solution.</p> <p>5 And then how come nobody asked us about the</p> <p>6 impacts? We think this is a significant impact to us.</p> <p>7 Dynamite, helicopters, that's just during the building.</p> <p>8 How about afterwards too?</p> <p>9 Thank you for your time.</p> <p>10 MR. MANKA: Following Mr. Pruim is Dusty</p> <p>11 Brazil.</p> <p>12 MR. PRUIM: Good afternoon. My name is Glenn</p> <p>13 Pruim. I live in the Rancho Dorado neighborhood right</p> <p>14 along Palomar Airport Road.</p> <p>15 I think everyone has covered the fire dangers</p> <p>16 pretty well, so I will stick to some of the other</p> <p>17 points. PMT1-17</p> <p>18 I'm supportive about any project that improves</p> <p>19 our power system reliability. I have no problem with</p> <p>20 that. I think we all can get behind that. It is just</p> <p>21 the manner in which they propose to do so. So I'd like</p> <p>22 to touch on a few points.</p> <p>23 So I'll focus mostly on the Palomar Airport</p> <p>24 Road/San Marcos Boulevard corridor. So the project</p> <p>25 proposes to add an additional 69 kV line. They are</p> <p style="text-align: right;">Page 20</p>

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<p>1 going to do that by replacing the existing wooden poles. 2 The steel poles will be much bigger in diameter. They 3 will be much taller and made out of metal, so they won't 4 fit in as well as any pole can fit in in the natural 5 environment. 6 So the height of the new poles, the minimum 7 height will be 81 feet above the ground. The maximum 8 height will be 110 feet. The maximum increase -- if you 9 look at an existing pole and what the new pole will be, 10 the new pole will be 44 feet taller. 11 Go stand next to one of those poles and look up 12 and imagine a pole being 44 feet taller than it PMT1-17 13 currently is. That's about 67 percent taller. (cont.) 14 I didn't hear CPUC talk about the aesthetics at 15 all in the mitigation measures. Maybe you did and I 16 missed it. That's a significant component, not as 17 important as the fire and the damage to people and the 18 property. 19 The project talks about needing to convey 20 69 kV, and that's important. What it doesn't really get 21 into is it also carries the third-party communications PMT1-18 22 lines. So they are going to be loaded up not just with 23 power lines, but you are going to have all the other 24 lines with the telecommunications companies on there 25 too. I don't know if that's conveniently overlooked or</p> <p style="text-align: right;">Page 21</p>	<p>1 I feel for the rest of you too. Those other 2 corridors, segment 2 and segment 3. I don't have to 3 deal with it directly, but it's not pleasant for our 4 entire community. 5 12 million vehicles per year pass by the 6 segment 1 on an annual basis. That's a lot of vehicles. 7 That's using information from the City of San Marcos on 8 their average daily trips. I don't want 12 to 9 15 million people every year thinking how ugly it is to 10 enter the city of San Marcos. I think this is the 11 opportunity to underground those power lines right now. 12 So at a minimum, alternative A should be PMT1-20 13 underground, preferably the whole project should be (cont.) 14 underground to improve wildfire safety and aesthetics in 15 our community. That's all I wanted to say. 16 MR. MANKA: Following Mr. Brazil is Doug 17 Richards. 18 MR. BRAZIL: Hi, everyone. I'm Dusty Brazil. 19 I've lived in San Elijo Hills for over 13 years. I live 20 at 1752 Kenwood Place in Calistoga. And I live directly 21 behind the power lines. PMT1-21 22 I don't know how many of you live near a power 23 line, but, you know, we have that mist or a little bit 24 of marine temperature, wow, you can really hear it zap. 25 It's really loud. It's extremely loud.</p> <p style="text-align: right;">Page 23</p>
<p>1 just intentionally not stated. 2 The document also says that the project is 3 needed to convey the increased renewable energy PMT1-19 4 generation mandated by the state. I don't like the fact 5 that San Marcos is being asked to bear the burden of the 6 state mandate and effect our property values and our 7 safety. 8 So lastly I just want to focus a little bit 9 more on the aesthetics of the project. We live in a 10 beautiful area. We all moved here because we think it's 11 a beautiful area. When you come into our community, if 12 you're coming in from Carlsbad, the gateway to all of 13 San Marcos is along Palomar Airport Road. As you're 14 traversing through Carlsbad all the way from Camino Vida 15 Roble going easterly, there is no aboveground 16 transmission line. There is none. It's a beautiful PMT1-20 17 corridor through here. 18 It's not until you get to the San Marcos city 19 limit that the aboveground lines start right in the 20 wildlife corridor, and it continues all the way past the 21 high school to Discovery. That's what they call 22 segment 1 here. 23 So at a bare minimum, I think the CPUC should 24 require that SDG&E underground segment 1 along that 25 corridor that serves all of San Marcos.</p> <p style="text-align: right;">Page 22</p>	<p>1 So the fact that I was told that the power 2 lines will be closer to where I live existing, I'm not 3 sure if that's true. I cannot possibly imagine that 4 happening. 5 Can I ask a question? Raise your hand if you 6 lived here over five years. 7 How many of you had chills when they showed you 8 the pictures of the fires? I had chills every photo I 9 saw and I relived that moment, caused me a great deal of 10 anxiety. So I am very anxious right now just even 11 thinking about more fires. And that's got to have some 12 impact on, you know, the community. 13 So number one, I live on power lines. I can't 14 possibly imagine there being more power lines where I'm 15 at now. Number two, obviously, I'm in real estate. 16 It's really hard to buy and sell a property when there PMT1-22 17 is power lines there. I show houses all through this 18 community. Rancho Dorado has always been a big bummer, 19 especially since they put the big power lines there. 20 It's not good for either side. 21 I live, you know, right off Elfin Forest. So 22 Elfin Forest is going to be affected, all those 23 residents in there, you know, obviously talk about fire. 24 Then Harmony Grove Village too. That's going to have a 25 huge impact on that community.</p> <p style="text-align: right;">Page 24</p>

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<p>1 We live in a great area and I support what 2 everyone said so far. Thank you. 3 MR. RICHARDS: Hi. I'm Doug. We just moved 4 here last year, and the main reason we moved here was 5 because it is so beautiful. It is just an 6 extraordinarily beautiful area. And that was before PMT1-23 7 we -- now we're really freaking out about fires after 8 hearing this whole thing. Now we're pretty much going 9 to run away. 10 We moved here for the beauty. People have said 11 this a lot better than I have in this room. The fire 12 reasons, the radiation, all that kind of stuff. But I 13 guess I want to spend my time just asking a few 14 questions. 15 It is notable to me -- I don't know how these 16 things work. I don't really trust bureaucracy, to be 17 honest with you. I wonder, why is there no SDG&E 18 representative here? How does this all work? 19 These people before me have made some brilliant 20 points. They showed some pictures and they really 21 prepared some good presentations. How is this getting 22 transmitted to the power brokers, the people who can 23 make the decisions? 24 So we can stand here all day long and give you 25 brilliant reasons why you should do these further</p> <p style="text-align: right;">Page 25</p>	<p>1 comments, hearing all the information you're providing, 2 and then we're presenting that to the decision-makers at 3 the CPUC. So that's our role. We're the independent 4 analysis. SDG&E doesn't have a role in this meeting 5 because we're doing the independent analysis and review 6 of the project. 7 MR. RICHARDS: But you guys spend a lot of time 8 analyzing aboveground system; right? You're 9 consultants. You've been hired to consider this 10 aboveground and not the belowground. Right? Is this 11 totally subjective, you decide what gets passed on from 12 this meeting? You make the presentation to the next 13 level, correct, or you're the decision-maker? 14 MS. STEINGASS: We are not the decision-makers. 15 The decision-makers are the administrative law judge and 16 the five commissioners for the California Public 17 Utilities Commission. If your community wants to 18 participate in the formal proceeding, your leadership 19 can file a motion for party status. The public advisors 20 office of the California Public Utilities Commission can 21 advise on how to participate in the formal proceeding. 22 And that would be one way for the community to play an 23 active role in the formal proceeding. 24 MR. RICHARDS: What concerns me is that there 25 is a filter between us and the judge or whoever is</p> <p style="text-align: right;">Page 27</p>
<p>1 analyses. Okay. But then do you just go home and 2 say -- you go to a bar, drink some beers, and say, "Boy, 3 those people were pissed. Let's just throw this into 4 the circular pile." And everybody laughs in a back room 5 with cigars saying, "Boy, these people never had a 6 chance, but they wasted several hours on a Tuesday." 7 So the question is: Where does this go from PMT1-24 8 here? Where do all these brilliant arguments that I've 9 been listening to go to get a hearing, how does it get 10 to the SDG&E people or the government people who can 11 really sit down and say, "Is this the right thing to 12 do?" 13 Even if we can't show that it is more than 14 marginal or whatever the legalese is, even if we can't 15 show that, how do we have somebody sane sit down and 16 say, "What are we doing here? What are we thinking?" 17 In a fire zone like this, I don't care what the report 18 says, you know, isn't it time to listen to these people. 19 How does that get done? What's the next step? 20 How do these comments get passed on? 21 MR. MANKA: If you want -- I'm trying to not 22 answer too many. But we are the government regulators. 23 So that's the team that's here listening to you. We're 24 doing the independent analysis and bringing this 25 information together, responding, considering the</p> <p style="text-align: right;">Page 26</p>	<p>1 making the final decision, so they're hearing either not 2 at all what we're saying or secondhand. Best case 3 secondhand. And so I'd like to cut out the middleman 4 and be able to directly have these brilliant 5 presentations that I've been hearing, far better than I 6 could ever make, hear them directly and truly understand 7 the concerns and the passion behind the community. 8 So you're saying the way to do that is -- you 9 just said; right? There is a formal process? 10 MS. STEINGASS: Right. 11 MS. THOMPSON: If I can just add. I want to 12 point out, if you have time, there is a board that has a 13 little bit more detail. We are happy to show you like 14 what points in the process comments get passed along and 15 where they go and all that. We do have information 16 about that and I'm happy to show you. 17 MR. RICHARDS: One last quick question. This 18 thing tonight, is this just a repeat of this meeting? 19 MR. MANKA: Yes. 20 And I apologize for not giving Robert Dunn a 21 heads-up. You are the next speaker followed by Tuee 22 Hyler. 23 AUDIENCE MEMBER: Tonight's meeting is 24 important. And I have party status. So if you want to 25 know more, come see me.</p> <p style="text-align: right;">Page 28</p>

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<p>1 MR. DUNN: Hello. I'm Robert Dunn. My wife 2 and I moved into town just after the fire five years 3 ago. We got the thrill of having a house built with 4 sprinklers in it, mandatory. Only way I can get fire 5 insurance is buying a house with sprinklers in it 6 already. My old insurance company in Ventura County 7 wouldn't even insure me. State Farm laughed, "You want 8 to build a house there? Are you nuts?" 9 As a member of AARP, I wanted to read an 10 advocacy letter, an awareness letter of what PG&E is 11 attempting to do right now by raising our rates higher 12 through the bankruptcy court. PMT1-25 13 AARP wants to hear from PG&E customers about 14 the impact utility rate increases have had on their 15 lives. I'm here to tell your story. 16 PG&E bankruptcy continues to make headlines in 17 our state. As the case proceeds, AARP remains committed 18 on making sure that PG&E customers have the voice in the 19 courtroom. Our position is clear and consistent. PG&E 20 must not be allowed to dump the cost of the wildfire 21 negligence on the backs of California utility customers. 22 That's what PG&E has managed to do. And I'm 23 sure SDG&E reads the same newspaper I do. 24 MR. MANKA: Following Ms. Hyler is Beverly 25 Jacoby.</p> <p style="text-align: right;">Page 29</p>	<p>1 My son is one years old. He was the one who 2 discovered the fire in our backyard. He was one years 3 old. When he even called me, I was working in my 4 office. I work from home because he's young. And my 5 husband was in school at that time. So the only thing I 6 can do is grab him and try and drive out of the 7 community. That not done. We are suffering in health 8 impact. 9 Our family, especially my son and I, have a 10 sinus disease. In fact, on May 2, I have appointment 11 for surgery for my sinus again. Every time the weather 12 change, even a little bit, spark of dust or anything, my 13 son will have eye tear and everything. You see my face 14 red right now, that's part of it. PMT1-26 15 So I agree. All the impact, everything you all 16 said, is everything correct. And please don't deny 17 that, because I lived through this and I said -- I came 18 here for the better safer good school for my kids 19 environment. I relive that again. Live in hotel for 20 two months waiting that house built again. 21 Now, if any chance, any small chance at all, if 22 you can eliminate that impact, please do so. Luckily, 23 none of us have anything to do with death, but financial 24 impact have dragging us down so much that we have to 25 rebuild our lives many times already.</p> <p style="text-align: right;">Page 31</p>
<p>1 MS. HYLER: Hi. My name is Tuee Hyler. I get 2 emotional. I'm here to tell you my story, my 3 experience. 4 In 2010, my house was burned down because the 5 transformer sparked the fire. We moved here and then 6 the fire when -- the fire would happen, my family have 7 to stay in a hotel for two months because the housing 8 was stopped building due to the fire. 9 My house 2010 is not totally burned down. Even 10 later on they rebuild it. We couldn't sell the house 11 before we build out here. It took us tremendous time 12 and effort to sell the house. The reason behind that, PMT1-26 13 there is no one wants to sell the insurance. The only 14 company sell us insurance, it cost \$2,300 per month. So 15 people don't want to buy that insurance. And most of 16 the people don't have cash to buy a house. The bank 17 require an insurance in order to do the loan. 18 We finally have to drop tremendous amount of 19 price in order to sell due to the fire. We lost all our 20 savings, everything in that fire. 21 On top of that, when we come here, we really 22 are trying, but I am still feeling the impact of the 23 fire from that transformer. And once I start with -- 24 because the wildfire start because of the transformer. 25 The transformer just exploded that day.</p> <p style="text-align: right;">Page 30</p>	<p>1 So today that's all I wanted to share this 2 story. 3 MR. MANKA: Following Ms. Jacoby is Paul 4 Cloutier. 5 AUDIENCE MEMBER: Can I ask a quick question 6 that I'm just curious on. 7 In the original presentation from ESA, we heard 8 that fire was considered as part of CEQA, but what I 9 understood up there was that was fire caused by 10 construction, that it was spark arresters and that type 11 of thing. So the concern was fire that would be caused 12 by the construction of this project. PMT1-27 13 Is fire caused post construction by 14 transformers exploding or lines coming down because of 15 windstorms something that you guys looked at as part of 16 the CEQA analysis or is post construction fire not even 17 considered? 18 MR. DAVIS: Sure. No, no. Post construction 19 fire is considered in mitigation that is proposed. You 20 know, right now as proposed, it does consider 21 construction-related fire and post construction are 22 going on. 23 AUDIENCE MEMBER: Thank you. 24 AUDIENCE MEMBER: Excuse me. Along the same PMT1-28 25 lines, I thought I saw on the chart, the CEQA side of</p> <p style="text-align: right;">Page 32</p>

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<p>1 the chart, that seismic was considered. Is that true?</p> <p>2 MR. DAVIS: Yes, sir.</p> <p>3 AUDIENCE MEMBER: When you say "seismic," are</p> <p>4 you talking about the power stability or are you talking</p> <p>5 about what would happen in the event of an earthquake?</p> <p>6 During the earthquake, you can't predict -- you can't</p> <p>7 say we're going to flip the power off, no problem. When</p> <p>8 an earthquake happens, those could come down. I don't</p> <p>9 know. Then we have a real problem.</p> <p>10 MR. DAVIS: It considers earthquake, the</p> <p>11 opportunity for the earthquake to happen, a chance for</p> <p>12 the earthquake to happen, just the seismic conditions of</p> <p>13 the area.</p> <p>14 MR. MANKA: Can we please allow Ms. Jacoby to</p> <p>15 speak.</p> <p>16 MS. JACOBY: I didn't expect to speak today. I</p> <p>17 just had a root canal about two hours ago.</p> <p>18 AUDIENCE MEMBER: This is worse.</p> <p>19 MS. JACOBY: It's been a great day.</p> <p>20 Neighbors, my name is Beverly Jacoby. I've</p> <p>21 lived in San Elijo Hills since 2002. When we moved into</p> <p>22 our house, it was eight months old. We were the second</p> <p>23 occupants, second owners. I love the area, but it was</p> <p>24 still a work in progress. There were no visible lines</p> <p>25 behind my house. I live in what would be segment 2</p> <p style="text-align: right;">Page 33</p>	<p>1 explanations and information about the fires. I'm</p> <p>2 terrified of fires. But it did occur to me -- being</p> <p>3 horrified at what happened in Paradise, California, and</p> <p>4 since then, I understand PG&E is going through</p> <p>5 bankruptcy negotiations, whatever you have to do -- how</p> <p>6 much cheaper would it be to put these proposed lines</p> <p>7 underground than to pay off all of these lawsuits that</p> <p>8 will be coming out of a community such as San Elijo and</p> <p>9 Dorado Hills if our community burns down? And it could.</p> <p>10 These fires are with us forever. We are in a</p> <p>11 climate situation where the storms every year are</p> <p>12 fiercer, the winds are fiercer. We're all going to be</p> <p>13 more impacted as time goes on.</p> <p>14 On a very, very personal level -- I'm sorry to</p> <p>15 get this way, but it affects me and the previous</p> <p>16 speaker. I'm crying for her inside.</p> <p>17 My husband passed away a year ago. And my tax</p> <p>18 person told me I needed to have my house appraised as of</p> <p>19 the date of his death, so I had that.</p> <p>20 And it was kind of surprising, but looking back</p> <p>21 not. She took \$40,000 off of my value of my house</p> <p>22 because of the pole. And it's written right in that.</p> <p>23 It's shown as an undesirable location because of the</p> <p>24 pole.</p> <p>25 Now, I have the smallest house in my</p> <p style="text-align: right;">Page 35</p>
<p>1 along the ridge behind my neighborhood, which is</p> <p>2 Sagewood.</p> <p>3 I came home from work one day, I think it was</p> <p>4 about 2009, and I couldn't believe there was this</p> <p>5 Godzilla structure looming over my garage from the</p> <p>6 street. And it was this power pole that had been put</p> <p>7 in. If they had notified me about it, I certainly</p> <p>8 didn't have any recollection of it. Anyway, it was</p> <p>9 there. I'm not a "not in my backyard" kind of person.</p> <p>10 I didn't scream. I didn't protest. It was there.</p> <p>11 Okay. Part of progress, I guess.</p> <p>12 Now, with this new segment 2 -- and I'm going</p> <p>13 to get real personal -- the current monstrosity is</p> <p>14 exactly 100 feet from my back door, and I understand</p> <p>15 that the new proposed line will be even closer, anywhere</p> <p>16 from 30 to 50 feet closer. In fact, someone told me,</p> <p>17 who has this knowledge, that they would actually have to</p> <p>18 build a retaining wall to hold up the part of the hill</p> <p>19 because there is this little ridge behind my house.</p> <p>20 Question: Why weren't they considering putting</p> <p>21 it 50 feet on the other side, which is unoccupied,</p> <p>22 instead of along -- there are probably a dozen houses</p> <p>23 along the ridge. They're all going to be impacted. The</p> <p>24 entire community is going to be impacted.</p> <p>25 Now, I can't improve on the previous speakers'</p> <p style="text-align: right;">Page 34</p>	<p>1 development. It's a one-story. If they're taking</p> <p>2 \$40,000 away for one pole, the parallel line, I can't</p> <p>3 even imagine. I don't think that my house will have any</p> <p>4 value at all. If you can't sell your house, it has no</p> <p>5 value. That's a real estate law. Something is of value</p> <p>6 only if somebody is willing to pay for it.</p> <p>7 If at some point in the future I need to sell</p> <p>8 my house or want to sell it, who is going to buy it?</p> <p>9 That's a very personal question and I apologize for</p> <p>10 getting this way, but it means a lot to me. I have</p> <p>11 nothing to give my children except my home. And if they</p> <p>12 can't sell it after I'm gone, it's not going to be a</p> <p>13 legacy at all. Now, I know this is not significant, but</p> <p>14 it's significant to me and I think it is significant to</p> <p>15 them.</p> <p>16 I can't do anything, I don't think, about the</p> <p>17 monstrosity that is already there, but I really wish and</p> <p>18 hope that recommendation to the PUC is that we do an</p> <p>19 environmental impact study that will encourage an</p> <p>20 exploration of an underground solution to the possibly</p> <p>21 necessary lines, but this isn't the only way to go,</p> <p>22 aboveground. We can consider below the ground. I think</p> <p>23 it would be a lot cheaper than considering the lives</p> <p>24 lost and the property destroyed of a horrible fire,</p> <p>25 which is, I think, inevitable down the road sometime.</p> <p style="text-align: right;">Page 36</p>

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<p>1 God forbid, it could happen. Thank you. PMT1-32 (cont.)</p> <p>2 MR. MANKA: It looks like we --</p> <p>3 MR. CLOUTIER: I gave up some of my time, so I</p> <p>4 will make this super quick.</p> <p>5 As a community, thank you, everybody. This is</p> <p>6 great, everybody coming together, because I don't think</p> <p>7 anybody in here really wants this.</p> <p>8 I have two bets with everybody. I already</p> <p>9 spoke my words of wisdom earlier, but two bets for</p> <p>10 everybody here. I'll be looking at something tonight,</p> <p>11 not you guys and not you guys, because you don't live</p> <p>12 here. But everybody does not like to look at this. PMT1-33</p> <p>13 Your electric bill. Right?</p> <p>14 But as I was looking at this preparing for this</p> <p>15 nice meeting, there is two things on here, transmission</p> <p>16 charge and a distribution charge, which is 175 percent</p> <p>17 increase on the actual electricity that you pay for. So</p> <p>18 not only do we not like this, we're paying for these</p> <p>19 towers. Just point that out.</p> <p>20 And something else for you guys you might want</p> <p>21 to look at. Besides probably using your best source,</p> <p>22 you know, seeing tree branches hitting power lines</p> <p>23 because we all were shut off, all our power was shut off</p> <p>24 so all our food could rot, you know, right before</p> <p>25 Thanksgiving when you are having all these people over</p> <p style="text-align: right;">Page 37</p>	<p>1 in the first cable, I had a television crew from one of</p> <p>2 the San Diego television stations come up here. And we</p> <p>3 debated this and it was discussed on television. And I</p> <p>4 was told by the San Diego Gas & Electric representative</p> <p>5 that this was it. This was the only improvement they're</p> <p>6 going to do. That was obviously a lie, because now here</p> <p>7 we have this new tower they're talking about putting in, PMT1-35 (cont.)</p> <p>8 which is about 200, 250 feet from my house, as well as</p> <p>9 Robert's. And I'm concerned.</p> <p>10 You mentioned the property values. I was told</p> <p>11 by a real estate broker about six months ago that 65,000</p> <p>12 easily on my house, it's valued less because of those</p> <p>13 cable lines.</p> <p>14 And now there is an unknown danger. And we</p> <p>15 really need to know from you folks about this danger</p> <p>16 involving intense electricity in our community. I've</p> <p>17 read about radiation issues affecting your brain,</p> <p>18 radiation issues impacting hormonal imbalances, PMT1-36</p> <p>19 potentially brain cancer, neurodegenerative diseases.</p> <p>20 Look where these power lines are going by and located</p> <p>21 by. There is a playground for kids right up from where</p> <p>22 I live that's close by to where these power lines are.</p> <p>23 They have places for kids to play.</p> <p>24 And yet you want to double or triple the size</p> <p>25 of the power coming through our community. Why can't</p> <p style="text-align: right;">Page 39</p>
<p>1 to your house, but besides that, kids like to take steel PMT1-34</p> <p>2 wire, baling wire, coat hangers, and you throw them up</p> <p>3 on those power lines. It is really interesting when you</p> <p>4 have a metal object cross those power lines. What</p> <p>5 happens to metal cables that you throw up there.</p> <p>6 So take a look at that. And it's louder</p> <p>7 than -- I don't know if anybody lit off M80s or</p> <p>8 anything. It is very loud and it's an entertaining</p> <p>9 thing. We do have kids around here. I'm not saying any</p> <p>10 of our kids do this, but it is a hazard and it's not</p> <p>11 good to see. But thanks anyways.</p> <p>12 MR. MANKA: Next up is James Lambert followed</p> <p>13 by Houa Chang.</p> <p>14 MR. LAMBERT: Hi. My name is James Lambert. I</p> <p>15 live in Rancho Dorado. I bought a home in this</p> <p>16 wonderful area in 2001, December of 2001. Great</p> <p>17 community.</p> <p>18 I'm really disappointed, not only with the PMT1-35</p> <p>19 CPUC, but San Diego Gas & Electric for not seriously</p> <p>20 considering an underground cable source. And the reason</p> <p>21 I say that is I'm impacted, just like you are. That's</p> <p>22 why there is 250-plus people here. And we need to do</p> <p>23 something about this and not just give up, let them have</p> <p>24 their way. And they need to listen to us.</p> <p>25 In 2009, 2010, beginning of '10 when they put</p> <p style="text-align: right;">Page 38</p>	<p>1 you put the extra money -- they charge us enough -- for PMT1-37</p> <p>2 underground services? I mean, you've got to look at</p> <p>3 things logically. And I feel that's not being done.</p> <p>4 Also, the size of this crowd shows that our</p> <p>5 community is very much concerned about that. So we need</p> <p>6 to put pressure on our political leaders. And if you</p> <p>7 have a pen and pencil, I suggest emailing our mayor so</p> <p>8 we can put them and tell them that we don't want this.</p> <p>9 Her name is Rebecca Jones. Her email address,</p> <p>10 if you can write this down. Everybody needs to email</p> <p>11 her. And I know if she gets 200-plus emails, it is</p> <p>12 going to spark an alarm. It's RJones@San-Marcos.net.</p> <p>13 You need to tell them that you're upset about this. PMT1-38</p> <p>14 The next city council meeting in the city of</p> <p>15 San Marcos is May the 14th at 6:00 p.m. We need to show</p> <p>16 up and tell her what we think and our city council</p> <p>17 recommends. Let's get active.</p> <p>18 I feel like the government agencies aren't that</p> <p>19 concerned. You just look at it without, you know, the</p> <p>20 concern that we have. We need to get active and tell</p> <p>21 them we don't want this. Anyway, thank you very much.</p> <p>22 AUDIENCE MEMBER: By the way, there is a</p> <p>23 Facebook group called Stop The Power Lines, in case</p> <p>24 anybody is interested, another means to kind of</p> <p>25 communicate.</p> <p style="text-align: right;">Page 40</p>

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<p>1 MR. MANKA: Following Mr. Chang is Daryl 2 Hunter.</p> <p>3 AUDIENCE MEMBER: Just to interrupt, there is a 4 bunch of schoolkids walking right here.</p> <p>5 MR. CHANG: Hello, neighbors. Well, my name is 6 Houa Chang. My family live here in San Elijo Hills for 7 14, 15 years already. In fact, my family and my friends 8 from San Elijo Hills been living for 15 years by the new 9 town center. We have a brand-new beautiful town center. 10 We don't want free power lines as a gift. We don't want 11 them. We enjoy the view. Okay.</p> <p>12 So in addition to all my friends' legitimate 13 reasons, here is my point. I'm a San Elijo Hills 14 Realtor. Last year I lost so many sales because there 15 are power lines hanging on the backyard, the tower on 16 the backyard. Okay. I explained to my buyers and as 17 far away, it won't cause any health issue. PMT1-39</p> <p>18 One of my customer's wife holding a little baby 19 in her hand said -- this is what she said, "But it would 20 cause psychological daydream brain damage from looking 21 at a power line along with a sunset every day."</p> <p>22 So is there such a thing as a psychological 23 daydream brain damage? Let me ask my daughter, who is a 24 medical doctor. Okay. I don't know.</p> <p>25 Anyway, so our city of San Marcos has five</p> <p style="text-align: right;">Page 41</p>	<p>1 I'm a little concerned about that at some point, 2 frankly, it hasn't happened today, but should the line 3 drop, it's going to electrify my whole fence around 4 there. It won't be fun for my dog or anybody else.</p> <p>5 The other concerns I have, of course, is 6 expressed by everyone else, the fire. Fire property 7 impacts the health, safety, noise certainly as was 8 expressed, both audio noise and for me as an amateur 9 radio operator, radio noise that will come in on that. 10 They also have antennas up, so I have to worry now about 11 the lines falling here and what I do with my property.</p> <p>12 I'm concerned about the EMF as well. I'm a 13 licensed professional electrical engineer. And I 14 regularly file radio-frequency hazard analyses with the 15 FCC and international regulatory bodies, more radio PMT1-42 16 frequency, but I am aware of EMF and I am concerned. I 17 know that some studies show that the impacts are 18 inconclusive, but nonetheless, I'm still concerned about 19 that.</p> <p>20 So I was here since 1994. I was living in Alga 21 and El Fuerte area when the fires burned in there about 22 20-some years ago. Had to evacuate. I watched this 23 whole area go up in smoke and watched the flames race 24 towards the coast. I was here again when we had the PMT1-43 25 fire a few years ago. So this is a real issue. I'm</p> <p style="text-align: right;">Page 43</p>
<p>1 colleges and universities. San Marcos is like 2 Cambridge, Massachusetts. San Marcos is a rising star 3 modern college town. And I feel that as the aesthetic 4 architecture and quality of life of San Marcos would be 5 compromised if the new power lines are built. Don't you 6 agree?</p> <p>7 Come on, please, tell the utility company to be 8 civilized. Build the power lines -- don't build 9 underground. Don't build them in the primitive way.</p> <p>10 So thank you very much for being here, 11 San Marcos. Thank you.</p> <p>12 MR. MANKA: Following Mr. Hunter is Pat Barnes. 13 MR. HUNTER: Thank you very much. Thank you. 14 My name is Daryl Hunter. I live at 1611 Via 15 Cancion. And I'm on page 12 of the plan here. The 16 easement on my property runs directly down the side of 17 my property. The proposed power lines is 30 to 50 feet 18 east of the current location, will run directly over my PMT1-40 19 driveways.</p> <p>20 The proposed construction staging points are 21 shown to block both of my driveways on the bottom and 22 the top of my property, so I don't know how I'm going to 23 get out while they do that, but I imagine they'll let me 24 out sometimes.</p> <p>25 I've got fence all the way around my property.</p> <p style="text-align: right;">Page 42</p>	<p>1 worried about it. And I share the concerns of all my 2 neighbors.</p> <p>3 MR. MANKA: Following Pat Barnes is Catalina 4 Aylmer.</p> <p>5 Are there any speaker cards that I missed?</p> <p>6 MS. BARNES: Hi. I'm Pat Barnes. I don't have 7 much new to add except one question that I have. 8 I still lived in Philadelphia when the 2014 9 fire broke out, but my daughter, her husband and their 10 son lived here. And she called me to tell me they had 11 to evacuate. And I'd been here many times. And I asked 12 which way they were going out. And she said, "We 13 couldn't get out on Twin Oaks. We couldn't get out on 14 San Elijo beyond Elfin Forest, so we're going through 15 the canyon." PMT1-44</p> <p>16 You can imagine how frightened I was. I said 17 to her, "Why would you go through the canyon? If the 18 fire gets there, you're just done for."</p> <p>19 And she said it was the only way that they 20 could get out of here.</p> <p>21 Now that I live here, I too am frightened of 22 fires and particularly the lack of egress. You can't 23 get out. There is just -- and this is my question: We 24 can't get out now. They're building 500 new homes down 25 the hill on Twin Oaks. And I want to know what this</p> <p style="text-align: right;">Page 44</p>

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<p>1 additional power is part of the plan and not -- it</p> <p>2 wouldn't be SDG&E or the California Public Utilities</p> <p>3 Commission, but is part of the reason for the enhanced</p> <p>4 power to allow for additional development? Anybody</p> <p>5 know?</p> <p>6 AUDIENCE MEMBER: I don't think these -- Robert</p> <p>7 probably knows, but these lines are not for our</p> <p>8 community. They are just bringing power to Vista or PMT1-44</p> <p>9 somewhere else. (cont.)</p> <p>10 MS. BARNES: Escondido?</p> <p>11 AUDIENCE MEMBER: So they're not even for the</p> <p>12 new development here.</p> <p>13 MS. BARNES: But see my idea -- Harmony Grove</p> <p>14 is at the end there. So there is still lots of land</p> <p>15 there. Okay. That's all.</p> <p>16 MR. MANKA: Is it Catalina Aylmer?</p> <p>17 MS. AYLMEER: Catalina Aylmer.</p> <p>18 MR. MANKA: Thank you.</p> <p>19 Followed by Li Tian.</p> <p>20 MS. AYLMEER: Hello. My name is Catalina</p> <p>21 Aylmer. I live here in San Elijo. And like everybody,</p> <p>22 I'm very concerned about what we're doing here with</p> <p>23 these power lines.</p> <p>24 And I just have a question. I'm not sure if</p> <p>25 you're really going to consider the human aspect or if</p> <p style="text-align: right;">Page 45</p>	<p>1 there tonight because they know this is happening and</p> <p>2 they are our elected representatives who should be there</p> <p>3 speaking for us on our behalf.</p> <p>4 So like a lot of people here, my insurance was</p> <p>5 also dropped when I first got my house and I had a very</p> <p>6 difficult time trying to find insurance. I live -- the PMT1-45</p> <p>7 canyon is right behind my house. (cont.)</p> <p>8 Aside from that and to put this very much in</p> <p>9 perspective for me is the fire danger in respect to</p> <p>10 children. We have about 5,000 children in San Elijo</p> <p>11 Hills going to school. All of them, by the way, are</p> <p>12 under eighth grade. We have San Elijo Elementary,</p> <p>13 San Elijo Middle School, and Double Peak. 5,000.</p> <p>14 God forbid there is a fire during school hours.</p> <p>15 They will not get out of here. There is no way they can</p> <p>16 walk out of this fire, all of them. Some of them are as</p> <p>17 young as day care centers right here and right across</p> <p>18 the way at Albertsons. There is no way we can save all</p> <p>19 those children.</p> <p>20 To me, that is the greatest reason why we can't</p> <p>21 have more power lines and more fire dangers brought into</p> <p>22 our community. We can't get out. Now, if this fire</p> <p>23 happens after school hours, there is going to be two to</p> <p>24 three cars, on average, per home, even for the</p> <p>25 apartments. We can't get out on this current one street</p> <p style="text-align: right;">Page 47</p>
<p>1 we're wasting our time, or can this go into your report.</p> <p>2 It would go into your report?</p> <p>3 MR. DAVIS: That goes on the proceedings side.</p> <p>4 That was what we discussed earlier.</p> <p>5 MS. AYLMEER: So it won't go into your report</p> <p>6 because we're sitting here giving you --</p> <p>7 MR. DAVIS: Because it is not required under</p> <p>8 CEQA statute.</p> <p>9 MR. MANKA: It will be entered into the PMT1-45</p> <p>10 administrative record and we will draft a response in</p> <p>11 the final MND, but the focus of CEQA is kind of what's</p> <p>12 under the purview of CEQA.</p> <p>13 MS. AYLMEER: I just want to make sure we're not</p> <p>14 wasting our time, because a lot of us are very</p> <p>15 passionate about this subject. We have, I think, really</p> <p>16 good input.</p> <p>17 Another thing is I don't know if city council,</p> <p>18 if there were any representatives here today, but I</p> <p>19 think they should have been here because they are our</p> <p>20 elected officials, and at the very least they should be</p> <p>21 listening to what we have to say about our community.</p> <p>22 AUDIENCE MEMBER: We're going to email this</p> <p>23 person, the mayor.</p> <p>24 MS. AYLMEER: But they should be here today.</p> <p>25 They knew this meeting was happening. I hope they're</p> <p style="text-align: right;">Page 46</p>	<p>1 that we have. San Elijo Road was not made for our PMT1-47</p> <p>2 community and for the community that these people keep</p> <p>3 approving because they keep allowing more and more homes</p> <p>4 to come into our hill.</p> <p>5 So it's something to really consider. So the</p> <p>6 approval you may give is not based just on environmental</p> <p>7 impacts. It is significant. It is significant because</p> <p>8 it affects so many people. It affects so many homes,</p> <p>9 but it affects so many children that really have no say.</p> <p>10 They don't have a voice. They're not able to come in</p> <p>11 here and speak to you, but they are quite important.</p> <p>12 They are the future of our nation. I would hope that</p> <p>13 you can put into consideration and it is part of your</p> <p>14 report. Thank you</p> <p>15 MR. MANKA: Li Tian and then I have one last</p> <p>16 speaker, Dana Pustinger.</p> <p>17 MS. TIAN: I think we all took our time to get</p> <p>18 away from home and work today. Anyone wants to see this</p> <p>19 power line come up?</p> <p>20 Everybody wants the underground, it has to be PMT1-48</p> <p>21 underground?</p> <p>22 Okay. So can we ask you, Joyce, Dave, Mike, be</p> <p>23 our hero. Tell us what we have to do, because we're not</p> <p>24 going to make -- we're not going to let these power</p> <p>25 lines happen. So tell us what we have to do to get this</p> <p style="text-align: right;">Page 48</p>

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1	done. Anything we can do, we will do it.	1	I'm begging you. You have to understand the	
2	AUDIENCE MEMBER: That includes tying Paul to	2	impact to the families, to the children. I've seen kids	
3	the pole.	3	when there is fires coming jump -- I was involved in the	
4	MS. TIAN: The other thing, I think you guys	4	fires that jumped Twin Oaks. I had kids playing	PMT1-50
5	can be an even bigger hero if we do underground and take	5	basketball. I was in my truck picking kids up. This is	(cont.)
6	down the power lines that are already there. Put them	6	a true reality for us. We choose to live here. We pay	
7	in the ground in the future, so we don't have all these	7	to live here. We don't want these lines endangering our	
8	issues. We don't have to risk our children's lives.	8	lives. That's all I have to say.	
9	That's all I have to say.	9	MR. VASSILAKIS: Hi, everyone. I'm Pantelis	
10	MR. MANKA: So following Dana Pustinger I have	10	Vassilakis. I'm a new resident in this community. My	
11	one more speaker, Pantelis Vassilakis.	11	family and I have purchased a property not long ago and	
12	I apologize for butchering everyone's names.	12	we'll be moving here in June. I drove here from	
13	AUDIENCE MEMBER: And in between, I just want	13	Los Angeles this morning specifically to make this and	
14	to state. I know nobody likes power lines in their	14	I'm going to sit in another three hours of traffic to go	PMT1-51
15	neighborhood. I'm sure you hear this from everyone.	15	back to pick up my kids from school.	
16	One thing that I think I would encourage -- I	16	I'm sure you've heard from others about the	
17	wish I said this up there -- to drive around. San Elijo	17	economic impact, the quality of life. And at 55, I've	
18	Hills specific is very unique from other open areas.	18	learned to not expect others to put somebody else's	
19	There are -- as you heard, there is only two ways in,	19	quality of life and financial well-being over their own.	
20	one way in and out. So that's what you're hearing. I	20	So I don't think that argument might go far.	
21	just want to be -- I wish I said that when I was	21	You've heard about the fire concerns that	
22	speaking.	22	everybody has. And the assumption is being made that	
23	MS. PUSTINGER: Hi. I'm Dana Pustinger. I've	23	fire will happen. That's a correct assumption. Fires	
24	lived here in San Marcos for over 15 years. And I know	24	happen in this neighborhood, in this city. This is	
25	a lot of you know that I'm involved with the schools and	25	something I didn't know until I signed my mortgage and I	
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1	the school district.	1	was asked to provide fire insurance. You know that	
2	I want to give you some input as being a	2	you're in trouble when insurers don't want your money.	
3	resident and as working with the schools. San Elijo	3	I had to go to insurance sharks. I was already	
4	Middle School is a stay-in-place school if there is a	4	in, so I wasn't going to pull out. And the irony is I	
5	fire. That has 2,000 students plus over 150	5	was leaving LA to avoid earthquakes. So I'm leaving	
6	administration. If there is a fire, we have to stay in	6	earthquakes to come to fire.	PMT1-52
7	place at San Elijo Middle.	7	We have a choice to make now. Do we increase	
8	So I want you to think about that when we have	8	our fire risks? Any little spark here will start an	
9	2,000 students with at least two parents who are trying	9	evacuation. I've already called the fire department,	
10	to get to their kids and they can't.	10	was the next thing I did, and asked them how many	
11	Same thing with San Elijo Elementary. It's a	11	evacuations have happened since the community where I'm	
12	stay-in-place school. Those two schools were originally	12	going to live was built? What is the highest cause for	
13	built in this canyon to be a stay-in-place. You have a	13	fires in this area of the state?	
14	fire rolling over the hill, you don't think those kids	14	You will be happy to know that it is not power	
15	are going to be afraid?	15	lines. It is cars. However, the largest amount of	
16	My kids went to La Costa Meadows when it was	16	acreage is burned through power failures, which in this	
17	burning at Poinsettia. My kids still think fire is not	17	area can start without even the power line falling. It	
18	good. It's not fun, unless they're at the beach.	18	can have a spark on a transformer. That's all it will	
19	I've worked in this school district for almost	19	take and the fire will happen.	
20	11 years volunteering my time, being in a lot of	20	While I don't expect -- in good faith, I would	
21	committees, working on boundaries, working on numerous	21	not expect you or anybody to put my or our quality of	
22	events. I have to be honest, when we have independent,	22	life above yours, I am going to fight tooth and nail for	
23	you know, companies, consultants come in, I don't have a	23	my life and for my home. By the way, it's the largest	PMT1-53
24	lot of credence in what they've done with the boundaries	24	investment. We all act nonchalant because we have a	
25	and what happened in the previous years.	25	mortgage. It's a million or \$2 million. We don't buy	
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<p>1 anything bigger than that. That's my life. If it 2 burns, I'm done. I'm toast. Everything I've done up to 3 now and everything I've built for. 4 To conclude, you know already. You must know 5 that. I'm not the only one who knows that. Anyone who 6 did a Google search, you know already that a good amount 7 of power companies in California are retrofitting lines 8 that are overground and replacing them with underground. 9 They go through this course, so they make an investment, 10 \$10, and they lose this \$10 and put another 10 to put it 11 underground. You have an opportunity to start 12 underground. Why don't you do it? 13 It's expensive? It will be way more expensive 14 to pay my life insurance and everybody else's and our 15 home and you are going to have to retrofit it anyway. 16 So if you are going to retrofit no matter what happens, 17 in this area the fires will happen. The lucky of us 18 will escape fire A and get fire B. The unlucky of us 19 will not escape any of them. 20 Why do you increase the risk for the fire when 21 it's going to cost you more money? And when you see 22 around you that your competitors, your industry is 23 tearing down overhead and putting them underground. So 24 put them underground. 25 And now I'm going to close. I have the luxury</p> <p style="text-align: right;">Page 53</p>	<p>1 We covered in the presentation the 2 opportunities to get your comments in writing. Keep 3 them coming. We're here to listen. We're there to read 4 and consider your comments. So please stay engaged. 5 Yes, ma'am. 6 AUDIENCE MEMBER: Just a thought. In looking 7 at the way your committee, your assessment group, put 8 fires as not significant, I think after this 9 presentation, you should change that. 10 MR. DAVIS: It's input that we do take in for 11 sure. I hear you. Yes, I hear you. 12 AUDIENCE MEMBER: Do they get submitted? 13 MR. DAVIS: We will revise the report as 14 information allows it will. One of the challenges that 15 we have is somebody is for a project, somebody is not 16 for a project. That doesn't inform the environmental 17 analysis. That's what we do. So when we get 18 substantive information, yes, we are bound to consider 19 that substantive information into our analysis. 20 AUDIENCE MEMBER: Do you take into account in 21 your analysis when you talk about fire -- and you may 22 not have thought about this before because you're not in 23 this community, but that we only have two points of 24 escape from this neighborhood if we have fire. And also 25 that we have the stay-in-place school in our community.</p> <p style="text-align: right;">Page 55</p>
<p>1 of working from home and having flexible hours. I'm 2 going to make it my life's objective. If this goes 3 through, I'm taking my last stand. I'm coming right 4 where you're digging. And you pull me out while the TV 5 and social media are looking at this. I'm going to do 6 it. I'm committing to my new neighbors here. 7 Pantelis Vassilakis is the name. Google me and 8 you will see who I am. 9 Thank you very much. I appreciate that you 10 come in and have this conversation because many things 11 like that happen where I live now, El Segundo. Do you 12 know where El Segundo is? Chevron, Department of Water 13 and Power, and the airport, everything under the carpet. 14 Without realizing it, things change, things happen. 15 Never an open discussion like this. 16 So thank you for doing this and thank you 17 everybody for coming. 18 AUDIENCE MEMBER: I think we should go far and 19 ask SDG&E to bury this existing power line. There is no 20 reason not to do it. 21 MR. DAVIS: Folks, thank you for coming. We 22 understand that you all took time out of your day to 23 come and do this. And the turnout has been very 24 impressive. We appreciate you participating in the 25 process.</p> <p style="text-align: right;">Page 54</p>	<p>1 So if there is a fire, we're at greater risk of getting 2 trapped. Can you put that in your report? Can you 3 somehow address that in your report? 4 MR. DAVIS: That is something we will take 5 under consideration. I hear a couple of things. I hear 6 transportation issues and I hear wildfire issues. And 7 we are public service. We do consider those under 8 public services. We will take that under consideration 9 as we are responsible to do under statute. 10 AUDIENCE MEMBER: Was it not considered in the 11 original review? Is egress part of that? 12 In other words, is that new information to you 13 or was that something that you already considered when 14 you were doing the initial report? 15 MR. DAVIS: That's one of those things it is 16 not brought out in the initial study checklist questions 17 that we reviewed. Okay. 18 AUDIENCE MEMBER: Who can we follow up with? I 19 know there is an internal process. Who can we follow up 20 with to make sure? Because what I'm hearing -- and no 21 disrespect. I'm hearing a little political answer. I'm 22 not sure what way you're going. I get it. You have a 23 job to do. 24 After you had some time to think about it and 25 settle in and everyone talks, who can we follow up with</p> <p style="text-align: right;">Page 56</p>

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<p>1 to make sure that either you've decided to put that in 2 the report or didn't decide to put that in the report? 3 MS. STEINGASS: You can follow up with -- 4 AUDIENCE MEMBER: Even if you put it in the 5 report, it doesn't change your assessment. It doesn't 6 matter. It is either material or not material, whatever 7 the word is. If it doesn't change it, then it doesn't 8 have any impact, I would guess, on the final analysis. 9 You've got to have that toggle where it toggles into 10 where they have to trigger that report, that extra 11 report. Correct? Does it make sense? 12 AUDIENCE MEMBER: How do we read the report 13 that you're drawing up? 14 MR. DAVIS: It is available online now. 15 AUDIENCE MEMBER: Anything you've heard today, 16 is it going to change your fire assessment? 17 MR. DAVIS: Just like Mr. Hadley said, we have 18 to take your information into consideration. 19 AUDIENCE MEMBER: I know you are going to take 20 that in and you can add a sentence or two. I'm saying, 21 you guys are experts. Is this going to change it from 22 flip that switch to suddenly it's a problem? 23 MR. MANKA: I would just say we're just part of 24 the expert team doing this analysis. So we go back with 25 our team of 25 people and take all of the information</p> <p style="text-align: right;">Page 57</p>	<p>1 MR. DAVIS: Yes. 2 AUDIENCE MEMBER: Yes. Right. So if the power 3 line goes down over San Elijo Hills Road, then we have 4 one point of exit. And if you've ever been in our 5 village on a school morning where there is just people 6 taking their kids to school, it is horrific. If we have 7 one point of exit, I mean, we're all doomed. It's 8 awful. 9 AUDIENCE MEMBER: Would it be helpful for us to 10 put together our own report showing photographs of the 11 traffic, showing diagrams of what's going on, explaining 12 some of -- maybe pulling up some fire facts in the area, 13 things that maybe weren't considered? Is there a way 14 for us to submit such a report? 15 MR. MANKA: Yes. Right now until May 30, 16 that's the kind of information that we're looking for 17 right now. So any information you have -- I think we 18 captured your comment on the San Elijo Road, but I 19 encourage you to submit it in writing. But any 20 additional information that you gather is welcomed. 21 We're looking for it. That's why we're here. 22 AUDIENCE MEMBER: So my last comment, I 23 promise. You saw all the people that are here. 24 Obviously these are real people with real stories and 25 this is during the day. And you know what, whatever you</p> <p style="text-align: right;">Page 59</p>
<p>1 that you're providing and all of the comments, and we 2 have to answer the questions of was it analyzed. 3 Because this is just the draft document. Okay. This 4 isn't a final document. What is available now is the 5 draft. 6 So we have to take your information, consider 7 it, and respond to it, and ask ourselves: Was it 8 analyzed in the draft? Is there additional analysis 9 that needs to be conducted? Are there significant 10 impacts that we didn't identify properly in the initial 11 draft, which triggers the EIR. That's kind of where we 12 are in the process. So I don't want to -- 13 AUDIENCE MEMBER: But is there a report that 14 says, "We received this new information. We analyzed 15 it, and here is our findings"? 16 MR. MANKA: Yes. 17 AUDIENCE MEMBER: Or is it just -- 18 MR. MANKA: That's the final mitigated negative 19 declaration if it doesn't go to an EIR. We'll have all 20 of the comments in it and all of the responses by the 21 analysis team. You will see all of these comments with 22 the formal response. 23 AUDIENCE MEMBER: So the last thing I'd like 24 you to consider is: This power line will go over 25 San Elijo Hills Road; correct?</p> <p style="text-align: right;">Page 58</p>	<p>1 decide to do, we're not going to stop here either way, 2 but what I would ask each of you is to represent our 3 will here basically. We live here and I want to -- do 4 any of you live near power lines? Do you have them in 5 your backyard? 6 MS. STEINGASS: No. 7 AUDIENCE MEMBER: Do you have them in your 8 backyard? 9 MR. DAVIS: Yeah. I'm in -- 10 AUDIENCE MEMBER: Do you love it? Do you have 11 them in your backyard? 12 MR. MANKA: I do not. 13 AUDIENCE MEMBER: While you're here, you're all 14 welcome to come over to any of our houses. I'll show 15 you our street. It is right here. It is really easy. 16 I just -- honestly, there is all kinds of 17 formalities. I think most of us can't keep up with. I 18 don't remember the CPUC thing, what it stands for. It 19 is your everyday job. We do need you to be our heroes, 20 as that woman said. And we know you're here for a 21 reason, but don't make this just a formality. I need 22 you to go back and represent us. 23 MS. STEINGASS: I've sat here for two hours now 24 and I've heard every word. And she's written down every 25 word. I'm taking that back with me.</p> <p style="text-align: right;">Page 60</p>

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<p>1 AUDIENCE MEMBER: So just for everybody's sake 2 who is here. I haven't talked to you guys. She's a 3 very great and fair woman. She's been -- she's on our 4 side as much as she can be. She's impartial. 5 MS. STEINGASS: It is my role to be impartial 6 and objective. 7 AUDIENCE MEMBER: You've been fair. 8 MS. STEINGASS: We've set up two public 9 meetings. We've extended the comment period so the City 10 of San Marcos can have its due process. 11 I've heard your outrage. I've heard your 12 anger. I feel it here, what you're saying. I'm hearing 13 it. I'm feeling it. It's very hard to sit here and 14 hear your anger and your outrage and your fear and your 15 terror, but I've heard that. 16 AUDIENCE MEMBER: We appreciate that. Thank 17 you so much. 18 AUDIENCE MEMBER: Thank you for coming. 19 MR. DAVIS: We just want to remind you, folks, 20 that there are cards on the back to look up, fill out 21 for comments. I heard somebody say before the meeting 22 started that that website is kind of maybe a little hard 23 to follow or whatever. That card will get you right to 24 the spot. 25 And, Dr. Pack, you suggested on Google for the</p> <p style="text-align: right;">Page 61</p>	<p>1 2 3 4 REPORTER'S CERTIFICATE 5 6 I, Cynthia J. Vega, a Certified Shorthand 7 Reporter for the State of California, do hereby certify 8 that the above-referenced proceedings were reported by 9 me on Tuesday, April 30, 2019, at 1105 Elfin Forest 10 Road, San Marcos, California; were taken by me 11 stenographically and were transcribed through 12 computerized transcription under my direction, and the 13 foregoing is a true and correct record of the 14 proceedings taken at that time. 15 16 IN WITNESS WHEREOF, I have subscribed my name 17 this 13th day of May, 2019. 18 19 20 21 22 23 24 25</p> <hr style="width: 25%; margin-left: auto; margin-right: 0;"/> <p style="text-align: right;">Cynthia J. Vega, CSR No. 6640</p> <p style="text-align: right;">Page 63</p>
<p>1 comment tool, you Google TL 6975 comment? 2 MR. PACK: Just 6975. You don't even need 3 comment. 4 MR. DAVIS: Okay. That should be a more direct 5 route to that comment tool. Okay. 6 Thank you, folks. 7 (Proceedings concluded at 3:01 p.m.) 8 * * * * * 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 62</p>	

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<p>CALIFORNIA PUBLIC UTILITIES COMMISSION</p> <p>SDG&E San Marcos to Escondido Tie Line 6975 69kV Project</p> <p>Proposed Mitigated Negative Declaration</p> <p>3 Civic Center Drive San Marcos, California 92069</p> <p>Tuesday, April 30, 2019 6:00 PM to 8:00 PM</p> <p>Reported by: Cynthia J. Vega, RMR, CSR 6640, CCRR 95</p>	<p>1 concerned us enough that I went out on my own, outside 2 my council, and investigated. We talked to the state 3 medical association, who confirmed that these were true 4 cases. PMT2-1 (cont.)</p> <p>5 Southern California Edison didn't address them 6 when we asked them to, so I took it upon myself. So I 7 can tell you, those are very real concerns for people.</p> <p>8 The second part of why I'm here is I spent 15 9 years in corporate legal for one of the largest national 10 insurance companies that have been around for decades. 11 I can tell you firsthand -- and I made a call to a 12 corporate legal office in Illinois this morning just to 13 make sure that I was still accurate in giving you the 14 information. When I explained what was happening here 15 with the towers -- State Farm is the company that I 16 actually called and then I made a second call to 17 Farmers, two of the largest. PMT2-2 (cont.)</p> <p>18 I was told that if those towers go up and for 19 homes who are accessed next to the canyons and the 20 brush, if our policies are not canceled completely, that 21 they will go up exponentially. That is simply what they 22 need to do because of the risk.</p> <p>23 They pointed out and reminded me -- I don't 24 think anybody needs to be reminded -- about the fire in 25 Paradise with PG&E. Also here in 2007, the San Diego</p>
<p>1 SAN MARCOS, CALIFORNIA 2 TUESDAY, APRIL 30, 2019, 6:00 P.M.</p> <p>3 4 MR. MANKA: I have speaker cards, I'll announce 5 the speaker and the one next. We ask that you keep your 6 comments to three minutes so that everyone has an 7 opportunity to speak and so that we have enough time for 8 everyone.</p> <p>9 The first speaker is Susan Pepler and then 10 followed by Kurt Schwend.</p> <p>11 MS. PEPLER: Good evening. My name is Susan 12 Pepler. I come here on a couple of levels. My husband 13 and I are homeowners in Rancho Dorado, but I bring 14 more -- two different unique perspectives to this. PMT2-1</p> <p>15 I'm a former mayor in the City of Redlands near 16 San Bernardino. My council and I went through this same 17 process over towers in our community. In our canyon 18 lands, our biggest concern was fire; aesthetics, of 19 course; and potentially the devastating health and 20 medical issues that I'm not seeing any discussion on at 21 all.</p> <p>22 What I learned is those towers had a 23 devastating effect on people who have pacemakers, who 24 have respirators, who have metal wheelchairs that are 25 electronic, leukemia, cancers. Those are things that</p>	<p>1 wildfires, San Diego Gas & Electric.</p> <p>2 The question comes up why they can't 3 underground. That was exactly the question my council 4 members and I asked as well. Cost was the number one 5 issue.</p> <p>6 So what I will say to you -- and I understand 7 that you are simply, you know, deciding factor, that 8 this is not your project, but what I would say to you is 9 for all of us who are homeowners -- and I'm telling you 10 from experience what we've gone through -- when our 11 property values have gone down, we cannot get insurance, 12 our families are ill, and then our homes burnt to the 13 ground, you can understand why we wouldn't have a lot of 14 sympathy about the cost factor. That's probably one of 15 the biggest. PMT2-4</p> <p>16 I would ask in your deciding -- and the CPUC 17 was very good in the City of Redlands to help the 18 council, and you did vote to have an environmental 19 impact report and we did too, and it was incredibly 20 helpful.</p> <p>21 All we're asking you -- and I'm just going to 22 set aside something here. I got out of government 23 because it was really tough for someone who truly wanted 24 to do the right thing for people who feel so jaded. 25 This is an example of why people don't trust government.</p>

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<p>1 I'm asking you to do the right thing with us 2 and watch out for the people, for us. It's our homes 3 and our well-being that we are most concerned about. 4 And we would be so grateful if you would please make 5 sure at the very least an environmental impact report is 6 done. Thank you very much for your time. I appreciate 7 it. 8 MR. MANKA: The next speaker is Kurt Schwend 9 followed by J. Lambert. 10 MR. SCHWEND: Good evening. My name is Kurt 11 Schwend. I'm a homeowner on Island Shore Way. And the 12 current power lines literally run at the top of the hill 13 directly behind my house. So I am incredibly affected 14 by this project. 15 I'm going to share two experiences we've had 16 with the existing power lines and my concerns if even 17 larger power lines go in. 18 The first experience was a couple years ago. A 19 mylar balloon hit the power line behind my house, 20 sparked, caught the pole on fire, and caught the brush 21 on fire underneath the power pole. Luckily the fire 22 department was able to put it out before it spread, but 23 since that time, there has been a lot more growth. The 24 hills have more brush on them. You put up a larger 25 power pole, you have more sparks and a larger accident,</p> <p style="text-align: right;">Page 5</p>	<p>1 impact on aesthetics. That makes no sense to me 2 whatsoever. 3 And you say there is no impact on population 4 and housing. How easy do you think it's going to be for 5 me to sell my house at some point in the future if I 6 have a giant metal monstrosity with power lines running 7 behind my house? 8 Now, I live in that one section of San Marcos. 9 If I cross the canyon, cross to the west, I hit Carlsbad 10 where every power line is underground. If I go a little 11 bit farther east on San Marcos Boulevard, I hit 12 San Marcos area where every power line is underground. 13 Why is this one section of San Marcos so unique 14 that they couldn't propose putting it underground? And 15 it makes absolutely no sense to me that they would step 16 out and propose something like this. 17 And I realize you're just evaluating their 18 proposal. But why would they propose something like 19 this that clearly nobody wants? And so many 20 neighborhoods around us, it has already been taken care 21 of. The power lines are underground. They're safer. 22 There is less fire hazard. 23 They're going to save a few dollars. They're 24 going to destroy our property values. They're going to 25 raise our insurance rates. It just doesn't make any</p> <p style="text-align: right;">Page 7</p>	<p>PMT2-4 (cont.)</p> <p>PMT2-8</p> <p>PMT2-9</p>
<p>1 and all of our houses are going to be at risk. 2 The other experience is along the same lines, 3 power poles behind our house. I don't know if they were 4 dirty, if they were broken, or what the problem was, but 5 for several months, there was a horrible buzz coming 6 from the power lines. It was 24 hours a day, seven days 7 a week. We complained to San Diego Gas & Electric. And 8 it took them months to fix it. 9 So what are you going to do to guarantee us if 10 these power lines go up, we're not going to be punished 11 with this constant electric buzz behind our house, and 12 if something happens, San Diego Gas & Electric is going 13 to get out there quickly to take care of it. 14 So those are my two comments. 15 Could you possibly go back to your slide that 16 we went to with the draft on it of the impact? 17 MR. DAVIS: The table? 18 MR. SCHWEND: The table, yes. 19 MR. MANKA: If you want to just leave it up. 20 MR. SCHWEND: That would be great. 21 So I see less than significant impact and 22 aesthetics. And I ask: What is that based on? Whose 23 idea of aesthetics? I'm going from a small wooden power 24 pole behind my house to this giant metal monstrosity 25 behind my house. And you're claiming that there is no</p> <p style="text-align: right;">Page 6</p>	<p>1 sense to me, unless it's a negotiating ploy so that they 2 can then turn around and say, "Okay. We'll put it 3 underground, but we're going to charge you guys more." 4 So I encourage you when they come back with 5 that proposal to explain to them that that is not the 6 way business works and they need to improve their power 7 poles. They need to do it in conjunction with the 8 community. And they need to cover the cost. Thank you. 9 MR. MANKA: Following J. Lambert is Jon Lycett. 10 MR. LAMBERT: I just want to thank all of you 11 for showing up for this event. 12 Sir, ma'am, you can see how many people are 13 opposed to this. It's clear. It's also clear that it's 14 not totally transparent on the actual damage that this 15 can do to a community. And what I'm thinking of is long 16 term. 17 If San Diego Gas & Electric is really concerned 18 about our long-term benefits to this community, they 19 would do it underground. It's clear. And that really 20 is something that's needed. 21 Just about two hours ago, I talked to the mayor 22 of the city. And she needs to hear from you. Nothing 23 against a community action effort, but the politicians, 24 our leaders, need to get involved. They need to also 25 voice opposition to this.</p> <p style="text-align: right;">Page 8</p>	<p>PMT2-7 (cont.)</p> <p>PMT2-10</p> <p>PMT2-11</p>

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<p>1 Our mayor's name is Mrs. Jones. And her 2 personal cell phone number is area code (760) -- if 3 everyone could write this down and call her. I think it 4 is needed. It's important. Area code (760) 519-2847. 5 Again, (760) 519-2847. 6 I'm also going to invite all the news groups to 7 get involved in this because people need to hear what 8 we're thinking about, not just a one-way conversation 9 from San Diego Gas & Electric. People need to hear what 10 the people are saying. 11 And just like three hours ago, there was a lot 12 of people at our meeting. There is similarly a lot of 13 people here that are going to be affected. There are 14 schools involved. There is kids. 15 Right under the power line close to where I 16 live, which is about -- I'm about 200 feet from a power 17 line, is a community recreation area for kids, you know, 18 to play on swings and stuff like that. They think this 19 is okay? No, it isn't. 20 We need to stand up as citizens against this 21 and I think it is important that all of us get involved 22 by calling our mayor and telling our elected officials, 23 city council members and everyone that this is not 24 acceptable. 25 I realize you're doing your part. I'm trying</p> <p style="text-align: right;">Page 9</p>	<p>1 I don't think it is appropriate in this case. I think 2 an EIR is clearly the more appropriate mechanism in this 3 situation. 4 The applicant's preliminary environmental 5 impact assessment identified undergrounding as an 6 alternative to this project. It rejected that 7 alternative primarily because of cost, but it pointed 8 out that the undergrounding alternative otherwise 9 completely eliminates all permanent impacts of this 10 project, including notably wildfire risk, but also risk 11 to critical habitat and Native American resources and 12 virtually -- not virtually. Every other permanent 13 impact of this project is eliminated, not just mitigated 14 by the undergrounding alternative. 15 Although, I would admit that it increases 16 somewhat the temporary impacts associated with 17 construction, but that seems like a small price to pay. 18 I think the biggest problem then with using the 19 MND, right, is that it doesn't analyze the alternatives. 20 Right? There is no alternatives analysis in the MND, 21 which is puzzling in a situation where one of the 22 alternatives pointed out by the applicant eliminates all 23 permanent impacts. And that's especially puzzling in a 24 situation where one of the impacts identified is 25 wildfire risk.</p> <p style="text-align: right;">Page 11</p>	<p>PMT2-11 (cont.)</p> <p>PMT2-12 (cont.)</p>
<p>1 to analyze this, but you also need to analyze whether 2 San Diego Gas & Electric offered or not what an 3 underground system would be, because that's what's 4 needed. Anyway, thank you very much for your time. 5 MR. MANKA: I've gotten a number of additional 6 speaker cards, so I just have to implore on everyone to 7 keep it to three minutes so we don't get kicked out of 8 the room before everyone has an opportunity to speak. 9 AUDIENCE MEMBER: I'll pay for us to stay. 10 MR. MANKA: Following Jon Lycett is Robert 11 Federico. 12 MR. LYCETT: Good evening. My name is Jon 13 Lycett. I'm a resident in Rancho Dorado. I'm going to 14 be submitting a letter because I think the MND doesn't 15 adequately assess the impacts. The letters are going to 16 discuss the cumulative impacts that I don't think those 17 were adequately analyzed in the MND. And I don't think 18 the MND adequately analyzes the wildfire. In fact, I 19 don't think the analysis there is appropriate even 20 remotely. Again, because as I called out earlier, it 21 only addresses the construction risk, not the long-term 22 risk associated with having power lines through 23 designated Cal Fire high fire risk areas. 24 Tonight, though, I want to appeal to the CPUC's 25 discretion to not use the MND mechanism at all, because</p> <p style="text-align: right;">Page 10</p>	<p>1 We're not just talking about risks to the 2 environment. We're talking about risks to people and 3 property. And the failure to analyze those risks in the 4 MND is, I think, a pretty gross application of the 5 CPUC's responsibility to the ratepayers 6 The reality here is the MND could be analyzing 7 the alternatives and whether or not -- for example, the 8 costs of the project, which is the reason the applicant 9 rejected that alternative in the PEA -- right -- is 10 really what they say it is. There is no analysis -- the 11 CPUC has undergone no analysis as to what the difference 12 in the cost of the proposed project versus the 13 undergrounding project actually is. 14 They've gone through no effort to determine 15 whether the route that the applicant loosely analyzed in 16 the PEA is the best route, the cheapest route, a good 17 route. Ultimately the CPUC in this case is 18 rubber-stamping a project that has the potential to put 19 people's lives at risk. 20 PG&E is currently on criminal probation because 21 dozens of people have died. Right? And I think the 22 CPUC has a better situation here, thankfully, with 23 SDG&E, but it is because of -- 24 MR. MANKA: Mr. Lycett. 25 MR. LYCETT: It's because of sort of mindless</p> <p style="text-align: right;">Page 12</p>	<p>PMT2-12</p> <p>PMT2-13</p>

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<p>1 bureaucratic decisions like this one that the situation 2 with PG&E was allowed to transpire, I think. 3 MR. MANKA: Mr. Lycett, could you please 4 conclude? 5 MR. LYCETT: Yes. 6 MR. MANKA: Thank you. 7 MR. LYCETT: So I would encourage the CPUC for 8 those reasons to use its discretion to insist that SDG&E 9 do an EIR and fully analyze the alternatives. 10 MR. MANKA: Following Robert Federico is Riley 11 Aylmer. 12 MR. FEDERICO: My name is Bob Federico. I live 13 on Schoolhouse Way. Every fall the brave women and men 14 from Cal Fire make news around the world. 15 Is anyone here from Cal Fire? 16 I wonder why. Of all the public agencies that 17 need to sign off on this monstrosity, is Cal Fire one of 18 them? Does anybody know that? Are any of these plans 19 run by Cal Fire to determine how many people -- forget 20 houses, how many people might die? Do you know if these 21 plans are run by Cal Fire at all? 22 You don't know. 23 MR. STEINGASS: The wildfire mitigation plan is 24 run by Cal Fire. 25 MR. FEDERICO: Where is that plan? We get one</p> <p style="text-align: right;">Page 13</p>	<p>1 out by October, and we'll be on the news again. And all 2 our friends from all over the country will call and ask 3 if we're okay. Thank you. 4 MR. MANKA: After Riley Aylmer is Stephanie 5 George. 6 MS. ALYMER: Hi. I'm Riley Aylmer. I'm a 7 sophomore at San Marcos High School. I just took a few 8 notes that I noticed as you were speaking, but I saw 9 that like on this table, you said that less significant 10 impact is wildfire. And then later when you guys were 11 talking, you said that you did find that there could be 12 significant effect such as wildfire. So I thought that 13 was kind of hypocritical and weird that you guys 14 mentioned that it wasn't significant and later, yeah, it 15 is kind of significant. 16 That kind of seems to strange to me because I 17 remember in 2014 the Cocos fire that happened that 18 definitely affected my area of San Elijo. I was in 19 elementary school at the time. I was in like fifth 20 grade. And it was roaring. I looked outside my 21 classroom and you can see the pillars of fire. It was 22 pretty devastating to the area. Even the last fire 23 season in Paradise was so much more devastating. And 24 that was caused by power lines. 25 And I did some research and saw that</p> <p style="text-align: right;">Page 15</p>
<p>1 line on the thing there that is saying it is less 2 significant. 3 MR. DAVIS: Just to clarify. Okay. The 4 mitigation proposed in the analysis requires that the 5 mitigation plan, the project-specific mitigation plan, 6 is reviewed and approved by all fire jurisdictions in 7 the project area, so that includes Cal Fire. 8 MR. FEDERICO: Has this been run by them? Do 9 you know? 10 MR. DAVIS: That's a condition of -- well, I 11 don't want to call it a condition. 12 MR. STEINGASS: That occurs later. 13 MR. DAVIS: That comes down later. 14 MR. FEDERICO: Like what, the day before you 15 start putting poles up? I'm serious. I'm dead serious. 16 How many people died last year? Does anybody 17 know? 18 AUDIENCE MEMBER: Hundreds. 19 MR. FEDERICO: Hundreds. That number seems to 20 be growing every year, not shrinking. 21 All I know is I've been in construction all my 22 life, and we started burying utility lines in the '60s. 23 In the '60s. I can't believe they'd ever want to think 24 of running overhead lines in this state, where the 25 right-of-way won't get trimmed, the shrubbery will dry</p> <p style="text-align: right;">Page 14</p>	<p>1 underground power lines were definitely a lot safer, 2 which makes a lot of sense because it's less likely to 3 start a wildfire and there is no brush under it. 4 And when I was looking at the maps back there, 5 I did notice that in front of San Marcos High School, 6 there would be new power lines built. And there is -- 7 if you're unfamiliar to how you get in, there is one 8 really sharp U-turn to get into the student drop-off 9 area, and there is going to be a power line right there. 10 And knowing teen drivers and knowing people my age, 11 someone is going to hit that. That sounds like a very 12 bad idea. 13 And I know that some people that have permits 14 that are driving themselves to school with the parents 15 in the passenger seat. That is even more risky, because 16 people my age have permits right now, and I'm like, I 17 don't think you should be doing that turn. But they're 18 doing it. 19 And we've had people crash into areas near the 20 school. And that just sounds like if someone hits it, 21 that's not going to end well. 22 But also one of the people talking 23 previously -- sorry, I didn't catch the name -- but she 24 said that they noticed that it has physical health 25 impacts, such as people with certain handicap health</p> <p style="text-align: right;">Page 16</p>

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<p>1 assistance, any cancer such as leukemia. And having 2 things in an area now -- and I know that a lot of youth, 3 sadly too many people I know have leukemia, and the 4 that we're building more power lines that can worsen 5 that or even cause that. It just doesn't sound 6 ethically right either. 7 And I understand that you guys are not the 8 people that say let's do it underground, but from my 9 understanding, you do eventually talk to SDG&E. If you 10 can say, "Hey, why don't we do this." Not only because 11 it's right, but in the long term if something were to 12 happen, if a wildfire were to happen, and eventually 13 SDG&E turns around and gets sued, it's going to be 14 probably less expensive in the long run to put it 15 underground and just not deal with it. 16 So yeah, that's the thoughts of a teenager. 17 Bye. 18 MR. MANKA: Following Stephanie George is Debra 19 with no last name. 20 MS. GEORGE: Hi. I'm Stephanie George, a 21 San Elijo resident and a real estate agent in the local 22 area. 23 I have two questions, and one of them kind of 24 relates to the gentleman before about Cal Fire. And 25 what I'd like to understand is these are summaries of</p> <p style="text-align: right;">Page 17</p>	<p>1 MS. GEORGE: Do we know who that is? 2 MR. DAVIS: Who the city council person is? 3 MS. GEORGE: Right. Is there someone specific? 4 MR. DAVIS: No, I do not. 5 AUDIENCE MEMBER: May 15, city council meeting. 6 MR. DAVIS: That's really two different 7 processes. Honestly, we're working with CPUC on the 8 CPUC process. There is a city process that's separate 9 from what we're working on. 10 MS. GEORGE: And the detailed report of how 11 this analysis was done, who were the experts involved in 12 this analysis? 13 MR. DAVIS: That is available online. It's 14 also available at the libraries, San Marcos and 15 Escondido. 16 MS. GEORGE: What is it called so we can find 17 it? 18 MR. DAVIS: Well, actually, in the back, I 19 think I did refer to postcards -- it's in the back -- 20 that provides the website address to where you can 21 access the full document. 22 MS. GEORGE: Well, I did go there and I saw the 23 pictures just like you had back there and I read a 24 summary, but I haven't seen the detailed analysis and 25 the people involved in it.</p> <p style="text-align: right;">Page 19</p>
<p>1 the impacts. Is there a way that we can see the 2 detailed analysis that was done to determine the outcome 3 of this analysis, this impact, and who was actually 4 providing the expert advice that came to the conclusions 5 here. Because I am very concerned that Cal Fire is not 6 one of the items or one of the individuals that was 7 allowed to participate in this analysis. So I find that 8 really concerning. 9 So I think it is very important that we 10 understand who gave their expert opinion in these 11 impacts. 12 The other thing is -- the second question I 13 have is: Who on the city council is participating in 14 this project and representing it? 15 This is a question for you. I'm waiting for an 16 answer. I'm not making comments. 17 MR. DAVIS: This is a CPUC project. CPUC is 18 the lead agency under CEQA. So the city council of 19 San Marcos does not have an action, if you will. They 20 are aware of the project. They have been provided 21 access to the documentation. Certainly they got the 22 same noticing that you all did about the public meetings 23 today, the two public meetings today. I believe that 24 they will be meeting in May to consider the project as 25 well.</p> <p style="text-align: right;">Page 18</p>	<p>1 MR. DAVIS: It's in there, honestly. 2 MS. GEORGE: Okay. 3 MR. DAVIS: Honestly. 4 MS. THOMPSON: The name of the document is also 5 on this postcard, so this will help direct you to that. 6 MS. GEORGE: Thank you. 7 MR. MANKA: Following Debra Avila is Tom 8 Primosch. And I apologize for my pronunciations. 9 MS. AVILA: Hi. I'm Debra Avila. I live in 10 San Elijo Hills community. I've been there for 11 15 years. 12 And in the beginning, there were maybe three 13 cell towers out there. And all of a sudden I started 14 noticing a lot of noise in the evening, buzzing and 15 sounds. And then the last couple of months, I thought 16 what is going on? 17 I'm for some reason sensitive to the 18 electromagnetic field. I haven't been able to sleep. I 19 can feel the static electricity in my house. I live in 20 the condos. If you go from Rancho Santa Fe, you drive 21 into San Elijo Hills community, you turn the corner, you 22 can see the infrastructure where they put on both sides 23 of the road -- well, actually on the left side, every 24 500 feet, the most ugliest, huge towers I've ever seen. 25 And some on both sides when you turn the corner.</p> <p style="text-align: right;">Page 20</p>

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<p>1 Now, when you get stuck in that traffic, you 2 are sitting right behind those cell towers. And there 3 are studies that people who lived right next to the cell 4 towers, they're dying from cancer. There is a student 5 who was going to school at San Diego State and her son 6 died because of the cell towers that were put in. They 7 were closer than 500 feet. A teacher died as well 8 because he was 80 feet from the cell towers. 9 Now, my concern is, how is it that I didn't 10 know that these were being put in? I've been there for 11 15 years, and I found out through the homeowners 12 association that we're having meetings. I said, "Wait a 13 minute. They already put them in." 14 If you follow the infrastructure and take a 15 look at those cells, they are the most gigantic. There 16 are different types. There is the cell towers that are 17 like this and big, round posts and they have wires going 18 out. And it is 2-by-2, every 500 feet, and they follow 19 the path from San Elijo Road out to Elfin Forest, and 20 who knows where else they go. If you go the other 21 direction, they go down Melrose out to La Costa to 22 Palomar Airport. 23 One day I was stopping at Poinsettia and 24 Palomar Airport, and I couldn't understand why the radio 25 station I was listening to started buzzing like crazy.</p> <p style="text-align: right;">Page 21</p>	<p>1 to protect me from my phone. They had an 2 electromagnetic field meter and a radiation meter. They 3 wanted to show me how -- it would show you how bad our 4 screens are affected by it. So they put the meter over 5 my phone and nothing happened. And they thought my 6 phone was off. I said, "No. My phone is on." 7 They go, "Maybe something is wrong with the 8 machine." 9 I went, wait a minute. This was back when I 10 didn't have -- I only had 2 gigabytes. Now I have 11 unlimited. So anyways, I said, "Well, just slide on 12 your Apple phone, you can see I have my cellular data 13 off. Let me turn it on." 14 I turned it on. It went all the way to the 15 extreme. Three people independent. I am now carrying 16 my cell phone -- a lot of people don't know, but you can 17 still receive calls, talk on the phone, and not be 18 affected. It doesn't get hot. 19 This is just a cell phone. Can you imagine 20 what's going to happen to us with these towers right 21 behind our houses and who's going to -- once they start 22 doing the research and they start finding the negative 23 effects on our health. 24 I cannot sleep. I can feel the electromagnetic PMT2-21 25 fields. It's static. I take off my clothes and you can (cont.)</p> <p style="text-align: right;">Page 23</p>
<p>1 And I look right on the corner, right there on the 2 corner and I'm stuck in traffic, and there is that tower 3 right there. 4 And I started looking and I went, "Wow. They 5 have already implemented them." They are all over the 6 place. 7 And where I live, I live in Morgans Corner, and 8 there is a field next to me. I cannot get insurance 9 because I live by a field. Now I'll be lucky if I can 10 continue to have insurance if there are fires. Who 11 knows what my rates are going to go up? 12 So anyways I also wanted to let you know I've 13 done research on the negative health effects on the 14 human body. What happens is it prevents our bodies from 15 getting oxygen to our blood cells, which we need so that 16 our mitochondria DNA can reproduce to keep us healthy. 17 It is going to start breaking down all of our immune 18 systems. And all of these poor children who are in the 19 schools using Wi-Fi is just going to be awful, if you 20 include that. When they put in the -- I don't know if 21 this is the 5G as well. Look at that. You are going to 22 be scared. 23 And unbeknownst to me, I didn't know the effect 24 that this cell phone has on me, but three people 25 independent of each other wanted to sell something to me</p> <p style="text-align: right;">Page 22</p>	<p>1 see the sparks. I go to plug things in, sparks 2 everywhere. And I used to have Wi-Fi. I got rid of it. 3 And I have my computer stuck to the Internet. And I did 4 this before those towers went in, because I could feel 5 it. 6 So I got rid of it. And then what happened is 7 I sold it. I'm just about done. I got rid of it and 8 put that in. No problem. And then I started to feel 9 sick again. Months, months later, I'm going, what's 10 going on? I got rid of it. I don't have Wi-Fi. I 11 don't use Wi-Fi. 12 Then I went -- I should look and see if they 13 put the towers. They are just all over the place. And 14 that's where I pass. That's where I used to walk. And 15 it is bad. 16 People have got to wake up. This stuff is 17 going to kill us. It's going to break down everybody's 18 immune system. And people look and do their research on 19 this stuff. That's all I have to say. 20 MR. MANKA: Tom Primosch. Following Tom is 21 Edward Wills. 22 MR. PRIMOSCH: Hi. Good evening, CPUC members. 23 My name is Tom Primosch. I moved into the Rancho Dorado 24 community in November of 2000. I'm currently the vice PMT2-22 25 president of our Rancho Dorado Homeowners Association.</p> <p style="text-align: right;">Page 24</p>

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<p>1 During that time I've seen power poles go from 2 reasonably sized wooden poles to monster, ginormous 3 steel poles that looked taller than what we were 4 originally even told about. Okay. Fine. That 5 happened. It's unfortunate, but it did. 6 Now we're being asked to accept new poles next 7 to the already ugly ones that are apparently not very 8 significant in an aesthetic aspect. But I disagree with 9 that. I also disagree that this is the best opportunity 10 for moving the power from one substation to the other. 11 For whatever reason, you and the CPUC are not 12 looking at -- probably because you weren't presented 13 with the SDG&E alternative to underground, which makes 14 sense, definitely reduces wildfires. You've heard a lot 15 of people here talk tonight about wildfires. 16 A member of the community even said he 17 witnessed one, saw the mylar balloon. I was around at 18 that time. I actually saw the canyon burning. I've 19 also been around and I've seen Carlsbad burning. I had 20 to rush to get my kids out of school because Carlsbad 21 was burning. 22 Later that same day in San Marcos, I saw a 23 DC-10 super tanker drop in fire retardant on Discovery 24 Hills because there is another fire that started that 25 day.</p> <p style="text-align: right;">Page 25</p>	<p>1 this is the best route as opposed to going underground. 2 I guarantee you, everybody here is going to tell you 3 this. Going underground, you virtually eliminate the 4 risk of fire. You keep that and the 75 dead people in 5 Paradise from happening in San Marcos. 6 Please, I ask you, I demand of you guys, get a 7 full EIR and study the whole potential for this project. 8 Thank you. 9 MR. MANKA: Following Edward Wills is Troy 10 Guerra. 11 I just need to remind you, please respect your 12 neighbors' time. The staff here told us they have to 13 leave, so we can't continue indefinitely. So please be 14 respectful of the other people in the room's time to 15 speak. 16 MR. WILLS: My name is Edward Wills. I'm a 17 homeowner in the Rancho Dorado community of San Marcos. 18 This has been in the segment 2 portion of TL 6975. 19 I'm concerned about the additional power poles 20 proposed in the TL 6975 power line project for many 21 reasons, especially the additional fire danger 22 environmental impact in our neighborhoods. 23 Speaking as a 19-year resident of Rancho 24 Dorado, the net cumulative effect of migrating from the 25 original single set of low profile wooden power poles to</p> <p style="text-align: right;">Page 27</p>
<p>1 We live in a fire-susceptible area. It is 2 unconscionable to put up more lines aboveground. So a 3 lot of people are going to talk. And you actually had 4 your slides. I'm going to show you guys some of my 5 slides. I'm going to give these to you. These are my 6 presents. Sir, you keep them. That was what is left of 7 my cousin's house in Paradise, California. All right. 8 He's lucky. He's homeless. He's alive. He 9 doesn't have a home. His sons don't have a home. 10 I'll read you something from NBC Bay Area 11 reporting. The California Public Utilities Commission 12 is responsible for making sure the state's power 13 providers meet safety rules, both in gas and electrical 14 operations. 15 In that same article, California state 16 regulators who oversee PG&E never audited a complex 17 network of high voltage transmission lines now under 18 suspicion in the Camp Fire. 19 If you guys can't even keep up with a community 20 in the middle of the woods somewhere, how do we expect 21 that you guys are going to keep up with providing the 22 correct impact for the fire potential that this could 23 have on our city? 24 Rather than go down that path, ask for the 25 environmental impact report. Let them show you that</p> <p style="text-align: right;">Page 26</p>	<p>1 the proposed two sets of high-rise and then medium-rise 2 galvanized poles has not been fully assessed. 3 First, I'm concerned that the environmental 4 footprint impact of the second set of poles has not been 5 addressed. And second, I'm especially concerned about 6 the added fire danger caused by running an additional 7 set of power lines at a level lower than the existing 8 set of towers. 9 Our neighborhoods are in an area defined as 10 tier 2 elevated fire danger as defined by this 11 California Public Utilities Commission. 12 And for the four of you members and contractors 13 who attended this afternoon's meeting in San Elijo 14 Hills, you now understand that there is a single ingress 15 and egress route to San Elijo Hills, and that there is 16 no shelter-in-place option should a fire break out in 17 the San Elijo Hills area. Because of this, SDG&E should 18 set the wildfire risk mitigation as close as possible to 19 zero in order to protect lives and property in the area. 20 Survivors of the 2018 Woolsey fire and 2017 21 Thomas fires will certainly echo the sentiment as Tom's 22 family member did. 23 I am respectfully requesting the CPUC direct 24 SDG&E to conduct a full environmental impact review as 25 well as wildfire risk assessment that addresses the lack</p> <p style="text-align: right;">Page 28</p>

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<p>1 of evacuation path for residents of San Elijo Hills.</p> <p>2 I would like the CPUC to encourage SDG&E to</p> <p>3 consider the options of alternative horizontal and</p> <p>4 vertical, spoken underground, paths for TL 6975 to</p> <p>5 mitigate environmental impact and fire dangers within</p> <p>6 the San Elijo Hills and Rancho Dorado communities of</p> <p>7 San Marcos. Thanks for your time and the opportunity to</p> <p>8 speak.</p> <p>9 MR. MANKA: Following Mr. Guerra is Andre</p> <p>10 Allen.</p> <p>11 I know some folks spoke at the earlier meeting.</p> <p>12 Your comments have been recorded. So I just want to put</p> <p>13 it out there. If you want to go to the back if we start</p> <p>14 getting short on time, that would be appreciated, but</p> <p>15 we're trying to fit everybody in.</p> <p>16 MR. GUERRA: Hi. My name is Troy Guerra. I</p> <p>17 live in Rancho Dorado. And I have two little boys,</p> <p>18 Jackson and Grayson, two and five years old. And in our</p> <p>19 neighborhood we have already large utilities running</p> <p>20 right through the neighborhood. I live across from Tom</p> <p>21 actually. And it's a huge concern already for us. And</p> <p>22 the idea of something even larger and more dangerous</p> <p>23 going in is a gigantic concern for them as they grow up.</p> <p>24 You know, I find it very odd that in a state</p> <p>25 like California that's hyper focused on environmental</p> <p style="text-align: right;">Page 29</p>	<p>1 AUDIENCE MEMBER: That is such a terrible</p> <p>2 answer.</p> <p>3 MR. DAVIS: We're charged with --</p> <p>4 AUDIENCE MEMBER: That is a bad answer.</p> <p>5 MR. DAVIS: We're charged with policy</p> <p>6 implications and things like that. That is, you know,</p> <p>7 kind of beyond our scope. That's not part of the</p> <p>8 environmental review process as defined under statute.</p> <p>9 MR. GUERRA: You've done this a lot. Have you</p> <p>10 ever heard of it happening? Have you heard, hey, SDG&E</p> <p>11 or PG&E or whoever it is, they've changed course because</p> <p>12 the community was upset and they gave such positive</p> <p>13 feedback.</p> <p>14 MR. DAVIS: I don't have personal knowledge.</p> <p>15 MR. GUERRA: Okay. Thanks for your time.</p> <p>16 MR. MANKA: Following Mr. Allen is Tiffany</p> <p>17 Lena.</p> <p>18 MR. ALLEN: Hi. My name is Andre Allen. I'm a</p> <p>19 San Elijo Hills resident. And a couple of my concerns</p> <p>20 have been addressed by some of the previous questioners,</p> <p>21 but there is still a few that remain in the statement</p> <p>22 that I'd like to make.</p> <p>23 The statement is that it does not make sense to</p> <p>24 not put this underground.</p> <p>25 Second, the summary impacts, I find this quite</p> <p style="text-align: right;">Page 31</p>
<p>1 protection like we are passes extreme laws to accomplish</p> <p>2 those goals sometimes, when something is an option to be</p> <p>3 underground, that aboveground wiring is even an option</p> <p>4 these days. Why is it not even considered by the state</p> <p>5 that it should be underground versus aboveground?</p> <p>6 Because of all the circumstances and all of the things</p> <p>7 that everyone brought up already, all concerns we have</p> <p>8 can be taken care of with that one issue.</p> <p>9 And I have one question for you guys. I've</p> <p>10 been through these things before. It seems like kind of</p> <p>11 an appeasement. Like "Hey, let's just talk to the</p> <p>12 community people and see how they're doing. Let them</p> <p>13 voice their opinion, but we're still going to go down</p> <p>14 our path whatever we decide to do."</p> <p>15 Have you ever seen SDG&E change their policy</p> <p>16 based upon community feedback and can you give me an</p> <p>17 example of it?</p> <p>18 MR. STEINGASS: This is my first San Diego</p> <p>19 Gas & Electric project. So I can't speak from --</p> <p>20 AUDIENCE MEMBER: But I'm sure you're educated.</p> <p>21 MR. GUERRA: This is your guys' job. This is</p> <p>22 what you do.</p> <p>23 AUDIENCE MEMBER: And your co-workers.</p> <p>24 MR. STEINGASS: I would have to research that</p> <p>25 and get back to you.</p> <p style="text-align: right;">Page 30</p>	<p>1 interesting. First of all, you should define what an</p> <p>2 impact is. Secondly, significant unavoidable impact. I</p> <p>3 don't quite know what that means. I do know that it's</p> <p>4 stated in a negative sense. So another way to read it</p> <p>5 would be significant avoidable impact. So what is that?</p> <p>6 What impacts can be avoided by putting them underground?</p> <p>7 Has that been looked at?</p> <p>8 MR. DAVIS: That was not the project presented</p> <p>9 to CPUC and then presented to ESA for review.</p> <p>10 MR. ALLEN: So what is meant by "significant</p> <p>11 unavoidable impact"? Because when I read that, that</p> <p>12 says that there is some impact that can occur, but you</p> <p>13 can't avoid. What does it mean?</p> <p>14 MR. MANKA: Each of those are defined in the</p> <p>15 document.</p> <p>16 MR. ALLEN: What does it mean?</p> <p>17 MR. MANKA: CEQA sets thresholds, so if you</p> <p>18 look at the document, there are thresholds for each of</p> <p>19 the impacts.</p> <p>20 MR. ALLEN: Can you tell us what it means?</p> <p>21 MR. MANKA: What it means is that there was an</p> <p>22 impact that exceeded the threshold that was used in the</p> <p>23 analysis and there was mitigation available to bring it</p> <p>24 below that threshold.</p> <p>25 MR. ALLEN: And that in English means?</p> <p style="text-align: right;">Page 32</p>

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<p>1 MR. MANKA: That's as simple as I can explain. 2 MR. ALLEN: Right. And that's not really a 3 definition. So this, though it's wordy and interesting, 4 it's not very informative or helpful. So I will read 5 the 400 pages online and have further comment after I do 6 so, but today is kind of perfunctory, and that's sad. 7 You wanted to hear what we have to say, just 8 like the gentleman before me stated. If you guys don't 9 know what occurs as a result of these meetings, what's 10 the purpose? 11 AUDIENCE MEMBER: To appease us. 12 MR. ALLEN: Thank you. 13 MR. MANKA: Is Tiffany Lena here? 14 MS. LENA: My name is Tiffany Lena. I moved 15 into my house in Sagewood in 2001 with the hope that 16 with the investment and the lot premium of \$50,000 that 17 we put down on our beautiful house overlooking a canyon 18 with very little high-tension wires, that at some point 19 my husband and I would retire and take some of that 20 money and go have some time for ourselves. 21 If you put another set of wires behind our 22 house, that's not going to happen. Any profit that we 23 would make on that house, Mark's house, April's house. 24 These are real people. This woman's house. 25 AUDIENCE MEMBER: Beverly.</p> <p style="text-align: right;">Page 33</p>	<p>1 dry brush in our neighborhood, and daily inspection. 2 I can't get SDG&E to come out and look at a gas 3 leak. And you're telling me that they are going to 4 patrol every single inch of those lines that are 5 proposed every single day? And again, I tell you 6 nowhere on the list that I saw does it address the fact 7 how close those wires are to the houses and how people 8 and their families will not have time to evacuate. 9 Thank you. 10 MR. MANKA: I apologize. I didn't read out the 11 name. I have Greg Rassatt next and Erick Luque 12 following. 13 MR. RASSATT: Good evening. I'm going to try 14 to help your timeline here. I'm going to begin by 15 saying, I fully agree with what you all have been 16 hearing. We need the EIR to occur. 17 I'm greatly concerned about the significant 18 impact of the aesthetics. I bought my home in 2002, saw 19 that whole thing, and what I have today is unbelievable. 20 And what you're proposing or what you evaluated on what 21 was proposed is really unbelievable. 22 I agree with the fire concerns wholeheartedly. 23 I agree with the health concerns. I have a neighbor who 24 has told me they've been denied through one insurance 25 request because of the lines we have today, let alone</p> <p style="text-align: right;">Page 35</p>
<p>1 MS. LENA: Beverly's house. That's going to be 2 a real problem for us and it's going to negatively 3 affect our lives at a time that we were really looking 4 forward to. We are real people. 5 The other thing I want to say is I evacuated at 6 least twice. The second time was in 2014. I didn't 7 think anybody was going to come to the fires of 8 San Marcos because there were already five fires raging, 9 Carlsbad and at least three or four other places. 10 Despite the fact that we can see the flames 11 coming over the hills, and they were a mile, maybe two 12 miles away, we couldn't get out of our neighborhoods. 13 We could not get out. Some people sat in line for two 14 hours trying to get out of their neighborhood. 15 The wires that are in back of our houses, if 16 something happens with the high winds, which we had our 17 electricity turned off, I believe, last October a few 18 times with the high winds, if anything happens and those 19 cause a fire, people aren't going to have time to get 20 out. We're not talking about two miles. We're talking 21 about hundreds of yards. Hundreds of yards away. 22 If I read your chart correctly regarding the 23 wildfire and the less than significant impact, you found 24 that was because there was adequate water supply, spark 25 arresters, avoidance of dry brush, which you can't avoid</p> <p style="text-align: right;">Page 34</p>	<p>1 what you're proposing. And of course, the value of our 2 homes, what is happening. 3 I'm going to end by saying: I'm upset. I'm 4 mad. And I'm sad that this has been even offered as 5 something that we should do. 6 What I was kind of hoping to hear was coming in 7 and saying, "Hey, with all these fire problems, let's 8 talk about burying what you have today and forget about 9 this. We'll do this a different way, but let's bury 10 what we already have today and we have to do." That's 11 all I've got. 12 MR. MANKA: Following Mr. Luque is Hank 13 Ingorgate. 14 Hank, would you be willing to go last and allow 15 new people to speak or do you want to speak? 16 MR. INGORGATE: I'd really like to speak, but 17 I'll wait. 18 MR. MANKA: Thank you. 19 MR. LUQUE: My name is Erick Luque. I live in 20 Rancho Dorado. I'm going to echo the sentiments of all 21 the neighbors. We strongly need the EIR to be done so 22 we can thoroughly analyze all the alternatives. 23 My home is going to be directly impacted by not 24 only segment 1, but also segment 2. I get a bonus. So 25 segment 1, which is going to replace the existing poles</p> <p style="text-align: right;">Page 36</p>

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<p>1 to steel poles twice the size. Many of the homes in my 2 community have yards that back up against existing 3 poles. The community is on a slope below San Marcos 4 Boulevard, so the visual impact is pronounced as you're 5 looking up at the wood poles that are now going to go 6 inside and become steel. PMT2-33 6 7 The photos in the mitigation negative (cont.) 7 8 declaration report only show views from San Marcos 9 Boulevard to the high school -- that's horrible with all 10 the kids -- and commercial businesses, but fails to show 11 the visual impacts from the homes looking up to the 12 poles. This will greatly affect the property values of 13 our homes. I strongly request other routes be 14 considered. 15 I will also be impacted by segment 2, which 16 will add the additional adjacent power lines. This will 17 increase the fire risk. As you all know in our PMT2-34 7 18 community, trails are filled with brush and natural 19 habitat. 20 As many of my neighbors, I request that the 21 underground option be seriously considered mostly in 22 light of the Northern California fires that show PG&E PMT2-35 2 23 equipment was most likely at fault. It appears to make 24 business as well as public safety sense to underground 25 the poles. Thank you.</p> <p style="text-align: right;">Page 37</p>	<p>1 I'm a member of the Rancho Dorado community. 2 I'm the president of the association. And I've been 3 here for now getting on 15 years. And I've watched this 4 community go from very little to a beautiful community, 5 and growing. 6 My big concern that I'm looking at, which 7 besides fires, which we have really talked about, is I 8 don't see anything up on this chart to do with health. 9 And I'd like to know what you've done in the impact of 10 health. 11 And I say this because about 25 years ago -- I 12 know this is a long time ago, but my father, where they 13 were living, had these poles or similar put up behind 14 their homes. And everybody kind of pooh-poohed it. It 15 was no big deal. And seven people, including my father, 16 died of leukemia 12 years later. I don't want to see 17 this happen. And I think that we need to take a very, PMT2-36 (cont.) 18 very close look. 19 This is coming into 2020. Wireless. We are in 20 a wireless world. We don't need to have wires over our 21 heads. We just don't need them. Underground is an 22 option. I understand that there is a cost factor and I 23 understand the impact of cost, but what is the impact of 24 cost versus the impact of loss of life? And I think 25 that we need to take a very close look at it and make</p> <p style="text-align: right;">Page 39</p>
<p>1 MR. MANKA: Mr. Ingorvate, are you going to 2 wait? 3 MR. INGORVATE: I'll wait. 4 MR. MANKA: Thank you. 5 I have Kathryn Ericsson followed by Lindsey 6 Smith. 7 MS. ERICSSON: May I please defer to Robert 8 Pack for mine? 9 MR. MANKA: He doesn't get any extra time. He 10 is in here to speak. 11 MS. ERICSSON: Can we swap, put him in there 12 before me? 13 MR. MANKA: He's up in a few, if you want to 14 just wait. 15 MS. ERICSSON: Please put me at the bottom and 16 put Robert Pack in. 17 MR. MANKA: Lindsey Smith. 18 MS. SMITH: I'll defer to Robert as well since 19 I spoke this morning. 20 MR. MANKA: Tony Beckerman. And then I have 21 Edward -- I'm sorry -- Moehlono after. 22 MR. BECKERMAN: Good evening and thank you for 23 taking our questions and our comments. I'm going to be 24 brief because I think my colleagues and my neighbors PMT2-36 4 25 have said everything that is in my heart.</p> <p style="text-align: right;">Page 38</p>	<p>1 some decisions for the people, not necessarily for the 2 pocketbooks. Thank you. 3 MR. MANKA: So Tony Beckerman. 4 MR. BECKERMAN: I just did. 5 MR. MANKA: Sorry. I have Edward M-o-e-h-l it 6 looks like. 7 MR. MOEHLONO: Eduardo. 8 MR. MANKA: Eduardo, sorry. Followed by 9 Mr. Pack. 10 MR. MOEHLONO: Hi. I will be brief and just 11 second pretty much everybody here. And I'm a resident 12 of the Rancho Dorado. I'm also impacted by 13 segments 1 and 2. I'm a resident in the northwest 14 corner of the intersection of the two segments. 15 And basically to me, it is like where is the PMT2-37 16 common sense to me, because it doesn't make sense to do 17 the power lines aboveground. It's the wildfires. This 18 is a main concern to everybody in California in general. 19 The power lines are the main cause of all the 20 wildfires in California. This is reported on again and 21 again. 22 So I'm just -- I'm here just to really ask for 23 the community to really go with the environmental impact PMT2-38 24 report. And I just wanted to voice my concerns that way 25 because there is a lot of impact. And I can't believe</p> <p style="text-align: right;">Page 40</p>

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<p>1 that we are all here trying to avoid something that 2 should be common sense. We want to move forward. I 3 think we all are in favor of progress, but let's not go PMT2-38 4 backwards with power lines. Let's do it underground. (cont.) 5 Safe for everybody and the environment. Thanks. 6 MR. MANKA: Robert Pack followed by Jason 7 Curry. 8 MR. PACK: Let Jason go first. 9 MR. MANKA: Okay. Are you going after Jason or 10 are you moving to the end? 11 MR. CURRY: Good evening. My name is Jason 12 Curry. I live in Rancho Dorado on Coast Avenue. Thank 13 you for coming out tonight. We appreciate you coming 14 here and hearing our comments. 15 I have a couple of comments and concerns 16 related to our neighborhood. One is we have a beautiful 17 park in the neighborhood, Simmons Family Park. Nice 18 grassy area. In the back of the park, moving west, 19 there is a beautiful ocean view. There is just one 20 thing sitting between the park and the current ocean PMT2-39:0 21 view, and that's the current power lines running right 22 through it. 23 To say that aesthetics is less significant of 24 an impact, I totally disagree with that. All you have 25 to do is go to the park that everybody uses and look out</p> <p style="text-align: right;">Page 41</p>	<p>1 there under the bullet point there. But putting another 2 power line there just puts that more at risk. 3 So I would strongly, strongly ask to look at 4 other alternatives. I have been involved with our HOA 5 committee, Mr. Robert Pack, he's on our committee. He's 6 going to speak in a second. But we have, especially 7 Mr. Pack, he has put in so many hours, so many hours 8 into this project. This is like an overtime job for PMT2-41 9 him. He's retired. This is his full-time job. (cont.) 10 He has found some other alternatives that have 11 not been discussed. And I would strongly consider the 12 environmental review to look at some of these other 13 alternatives, such as undergrounding. And as a bonus, 14 if you do underground, if you can take out the current 15 poles and underground those as well, that would be great 16 MR. MANKA: So, Mr. Pack, are you willing to go 17 after Mr. Ingovate? 18 MR. PACK: Yes. 19 MR. MANKA: Great. I have Debra Tadman Paris 20 followed by Brian Wood. 21 MS. TADMAN PARIS: Hi. I'm very sad that all 22 these people are here and trying to make a difference. 23 I'm just not sure how much of a difference we can make. 24 I'm hopeful, because this is really an important issue. 25 I can't even believe that you're going to be</p> <p style="text-align: right;">Page 43</p>
<p>1 the back of the park. 2 And the current plan is going to put in more 3 power lines right in front of the current power lines 4 even further, ruining that view of the park. It's a 5 really beautiful view. 6 The other concern I have is a personal concern. 7 I live on Coast Avenue. The current power lines run 8 literally in the lot next to my house. There is a 9 gigantic pole there now, a couple hundred feet tall, I'm 10 guessing. 11 The current plan is going to place a new pole PMT2-40 12 between that current pole and my house, further 13 obstructing the views, the property value of not just my 14 house, but all the other surrounding houses. And as the 15 property values go down to the area, that's a concern 16 for the local government because less property values is 17 less property taxes. So it will impact the community. 18 I don't know if there is any validity to this, 19 but every time I watch a Hollywood movie about the end 20 of the world and there is an earthquake, sometimes I 21 think about the current power line and if that current PMT2-41 22 power line pole fell on my house, what kind of effect 23 that would have obviously. 24 I don't know the seismic grounds of the area, 25 but that's another concern I have. It is listed up</p> <p style="text-align: right;">Page 42</p>	<p>1 putting new power lines up in a place that is already 2 inundated with way more development than we should have 3 had. We cannot get in or out of San Elijo. I live in 4 San Elijo. There is no way. In 2014, I tried to get 5 out early and I was in a deadlock, a gridlock with so 6 many cars. 7 We have so many more developments that have 8 gone up and are currently going up. PMT2-42 9 I'm really very happy that a child was here, a 10 young woman. I'm sure many more would be here to speak. 11 San Elijo and San Marcos is full of children. We all 12 know that. There are parents here. I was a teacher in 13 San Marcos for 33 years. I live in San Elijo. And I 14 teach in San Elijo still. I'm a substitute teacher. I 15 see all the beautiful faces. I see these children. And 16 I just wonder what we are doing to these children. 17 Because, first of all, there is fire dangers, 18 and not only that, there are people with serious health 19 issues from the EMFs. Right here, this is the -- I 20 study nutrition because I think it is so important. And 21 in this day and age, we need to, because as Debra 22 said -- I know Debra -- we do have so many cell towers. 23 We can't do anything about that. They are affecting our 24 health. 25 So, please, we have an opportunity to have</p> <p style="text-align: right;">Page 44</p>

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<p>1 these power lines put underground. It is just like -- 2 to me, it is like a no-brainer. I taught kindergarten 3 for 21 years. They would understand this. They would 4 know to put it underground. 5 Right here it says, "Environmental radiation. 6 EMFs, what do we know. EMF, electromagnetic fields. 7 According to a 1991, EPA study, there is growing 8 evidence of a link between heavy electrical currents and 9 cancer. Studies in recent years have suggested a higher 10 incidence of leukemia and brain tumors among people 11 exposed to electrical fields on the job. 12 In 1987 -- this is years ago -- study found 13 that children living near electrical power lines faced 14 five times the risk of all forms of cancer compared to 15 children who did not. 16 Our community is full of children. These are 17 the people. These are children that are our future. 18 Please consider that this is so important for all of us, 19 the children, and the future of our environment. 20 We could take a stand here and we can show 21 California an area that is very prone to fires, we can 22 show them what is available and what can happen. We can 23 change California and perhaps the world. Thank you. 24 MR. MANKA: Following Mr. Wood is Julie Herman. 25 MR. WOOD: Hello. I'll be brief. My name is</p> <p style="text-align: right;">Page 45</p>	<p>1 MR. MANKA: Joe Weslock followed by Larry Rote. 2 MR. WESLOCK: Good evening. My name is Joe 3 Weslock. I'm another resident of Rancho Dorado. I 4 appreciate everybody coming out tonight. 5 I realize this is a job for you guys. I hope 6 you can see by the turnout here that this is very 7 personal for us. Matter of fact, I hope there are no 8 thieves monitoring this because I believe my entire 9 community is here tonight. 10 I'd like to add my voice to many others that 11 are asking for a full environmental impact study on this 12 to more properly and more fully evaluate the options. 13 I am myself an environmental professional, an 14 environmental engineer. And I've had to go through this 15 on the consulting side as well. 16 As somebody who has paid several thousand 17 dollars to put up a tiny Cypress to block the view of 18 the ocean from his home, I can tell you that seeing 19 aesthetics as a less than significant impact is simply 20 insulting. And in part because of that and all of the 21 phenomenal comments that my neighbors have contributed 22 tonight, I think doing less than a full environmental 23 impact would do our community a massive injustice. 24 Furthermore, I hope you don't take personal 25 offense at this, but we're talking about a company and</p> <p style="text-align: right;">Page 47</p>
<p>1 Brian Wood. I'm a resident, homeowner, and taxpayer in 2 San Elijo Hills. 3 Thank you for holding these meetings and for 4 extending the comment period of 60 days. 5 I'll be very brief. I'd just like to request 6 an environmental impact report. My three primary 7 concerns is aesthetics, safety, and property values. 8 I'd like to end by suggesting that you consider 9 the wisdom of this crowd. Put yourselves in our shoes 10 and act as if the lives of your family members were at 11 stake. 12 MR. MANKA: Following Julie Herman is Joe 13 Weslock. 14 MS. HERMAN: Hi. I'm Julie Herman. I live in 15 San Elijo Hills. And I just wanted to say that I 16 completely support everything that everybody has said 17 here tonight. And I can't emphasize enough how I really 18 would like you guys to put those wires underground. 19 I have been evacuated from my house two times 20 already. I've lived here for over 12 years. And the 21 thought of having those wires go up just scares me to 22 death thinking that a threat of a fire could kill me, my 23 neighbors, people that are sitting here tonight. It's 24 just not worth it. Please, put those wires underground. 25 Thank you.</p> <p style="text-align: right;">Page 46</p>	<p>1 an agency that approved building a nuclear power plant 2 on the beach. So there is a significant well-earned 3 level of distrust among the community. 4 No more than five years ago, we had these 5 monstrous power lines put on. We're here only five 6 years later now hearing that there is a proposal for 7 another set of massive power lines. 8 What you do we have that we're not going to be 9 back here in another five years to hear about yet 10 another row of power lines. When we're looking at that 11 versus the long-term investment to provide stable power 12 for the community, I truly do not believe that the 13 economic viability of putting the lines underground has 14 truly been accurately and reasonably evaluated for the 15 present alternative. That's it. Thank you. 16 MR. MANKA: Following Larry Rote is Yixiong 17 Zhou. 18 MR. ROTE: Hi. Good evening. I just wanted to 19 talk real quick about aesthetics and I wanted to show 20 you a picture of the view that this gentleman talked 21 about from the park. Some of us have that view out of 22 our backyards. I would like to show you what it looks 23 like currently. 24 This is that view that the gentleman talked 25 about.</p> <p style="text-align: right;">Page 48</p>

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<p>1 MR. MANKA: I would like you to please submit 2 that as part of your comments. 3 MR. ROTE: I absolutely will. 4 So what this shows is my view towards the ocean 5 with this power pole currently. Now, I don't blame 6 anybody for this power pole because I actually bought my 7 house with that power pole there. So I bought it. I 8 knew it. 9 What's going to happen under the current 10 proposal -- and I don't blame you guys for this 11 proposal. I think at times we're telling you to put 12 these underground when you're not SDG&E. But what you 13 do have the power to do is go back and suggest a 14 different option. 15 And in the current plan, these power poles will 16 be lower than the current power poles. I'm trying to 17 keep my children out of jail. And from their backyard 18 it's going to look like they're in it. 19 So I can't restate anything else better than 20 all of these people already have. But the concern is 21 that our property values will drop drastically and the 22 view from our homes will be greatly impacted. Thank you 23 for your time. 24 MR. MANKA: Following Mr. Zhou is Yi Zhao. 25 MR. ZHOU: My name is Yixiong Zhou. And I have</p> <p style="text-align: right;">Page 49</p>	<p>1 causes the human loss. 2 If we put all these factors together, then I 3 think you will see a very different picture from that. 4 And I hope that you will do a good job on that. Thank 5 you very much. 6 MR. MANKA: Following Mr. Zhao is Edmond Zaide. 7 MR. ZHAO: Good evening. I'm a resident of 8 San Elijo. To be honest, I didn't know much of CPUC 9 until this evening. So I looked up your website. Your 10 value statement is: Acts with a commitment to the 11 health and safety of Californians and the preservation 12 of natural environments. 13 I understand you are given the project to 14 analyze and you know there is an alternative. That is 15 obviously superior along your values. I urge you to 16 adhere to your value and the commitment to step above 17 and beyond the project scope, to advocate the option 18 that you believe, to advocate your value, safety, 19 health, and environment. Thank you. 20 MR. MANKA: Following Mr. Ingorvate, I have -- 21 sorry. Following Mr. Zaide, I have Mr. Ingorvate. 22 I did get a couple additional commenters at the 23 end. I think we'll be okay. We can get through 24 everybody. 25 MR. ZAIDE: Good evening, everyone. Good</p> <p style="text-align: right;">Page 51</p>
<p>1 been a resident of Sagewood for the past 18 years. And 2 my family moved in the first family. I'm still having 3 the house and living here. 4 And we have seen, you know, the power lines 5 start from a little wooden pole and goes up into a big 6 tower. And now it is going to be a gigantic one. And I 7 will anticipate in the future, not very long, you will 8 have another one, because people are driving in electric 9 vehicle and will drive more power. So that's very 10 natural course to go. 11 And we already know that global warming, that 12 will increase the dry condition and the wind from the 13 desert. And that's a fire hazard. Now we're concerning 14 in the future it will be hot. 15 I think if we're thinking about these factors, 16 we really need to have careful thoughts. And I hope you 17 guys will be able to provide a real good analysis on 18 those factors taking them into consideration. 19 And I think, you know -- I think the strong 20 motivation to not put the underground is the cost. 21 Right? So if we considering cost, we should really 22 consider all the costs, not only costs of the SDG&E 23 putting the wires underground, but also the cost of 24 homeowners insurance increase, and the homeowners 25 housing value decrease, and also the potential fire that</p> <p style="text-align: right;">Page 50</p>	<p>1 evening, neighbors. My name is Edmond Zaide. I've 2 lived in Rancho Dorado since about 2001. Actually I 3 live next door to Robert here. 4 I echo everybody's words tonight. I appreciate 5 everybody's words. I'm United States Marine Corps 6 retired, and so I speak from experience when I say 7 during wartime, you fight for the Marine next to you. 8 So I say this because I need you to take this 9 personally, because when you take it personally, it's a 10 difference, whether it's aesthetics, whether it's 11 population, whatever it may be. When you take it 12 personally, when you take it to that -- if you live next 13 to me and you see these power lines and you see what 14 affects us, then you can see, then as you take it 15 personally, you make that decision. 16 If I was sitting next to you, is this something 17 you would pass? Because once you do -- I'll tell you 18 right now, you will not pass this thing. All right. 19 So you know, I can't say it any better than 20 they have already talked about here. I can tell you 21 personally that this really affects us. And I've lived 22 there almost 19 years. And those power lines just keep 23 getting bigger. That's all I have to say. 24 MR. MANKA: Following Hank Ingorvate is Robert 25 Pack.</p> <p style="text-align: right;">Page 52</p>

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<p>1 MR. INGORVATE: Hi. My name is Hank Ingorvate. 2 I'm a resident of Rancho Dorado. I moved in there in 3 2001. And at that time they only had wooden poles. And 4 then all of a sudden things changed and SDG&E put in the 5 138 kilowatt poles. And we didn't have any discussion 6 like this when they did that. Okay. 7 One of the things that bother me is, is that 8 once you allow SDG&E to put in the 69 kVA poles, that 9 gives them the authority, since you've already given PMT2-52 10 them the right-of-way, to increase the amount of kVA 11 anytime they want. And they don't have to have a 12 meeting like this. 13 So you've given them the free reins to put in 14 as much power as they really want. So as you increase 15 the number of kVA, you are also increasing the 16 electromagnetic field. And the electromagnetic field 17 power lines does have a very severe health impact of 18 cancer and leukemia. We've heard that. 19 The thing that bothers me is is that your 20 impact doesn't consider anything about the health 21 concerns. If you would take a look at what happens when 22 you bury power lines under the ground, you have less PMT2-53 23 electromagnetic field effect on human beings. So it 24 makes more sense to do the burying. 25 Now, I worked for the DOD for 51 years. And</p> <p style="text-align: right;">Page 53</p>	<p>1 MR. MANKA: Mr. Ingorvate. 2 MR. INGORVATE: That's my concern. 3 The other little concern that nobody's ever 4 mentioned is the wildlife. You know, we have little PMT2-57 5 roadrunners running in my backyard. Okay. I've had the 6 golden eagles sitting on my fence, hawks, hummingbirds, 7 gnatcatchers, and even the California spotted owl. 8 Nobody is talking about any of those kind of things that 9 I have a concern about too. So anyway, thanks for your 10 help. Thanks for my time. 11 MR. MANKA: Robert Pack. And then I have the 12 folks who deferred to Mr. Pack and then I have a couple 13 new ones at the back I'd like to get to before we 14 conclude. 15 MR. PACK: Okay. I just don't want to take 16 anybody's time. 17 All right. Hello. My name is Robert Pack. I 18 spoke earlier today. And I might start out by saying my 19 goal and a lot of people's goals here tonight is to get 20 you to make a recommendation to conduct a full 21 environmental impact report. That's the key. 22 Why is that? How do we get that to happen? A 23 lot of people have asked that tonight. That chart is 24 the key. Notice there is 20 criteria there. Out of 25 those 20 what I notice is that the two that we talked</p> <p style="text-align: right;">Page 55</p>
<p>1 one of the things that has not been discussed here PMT2-54 2 tonight is that, you know, we really should have more 3 concern about terrorist attacks. And with the cables 4 being buried, that's something that you don't have to 5 worry about. 6 And all you're doing is that you're taking a 7 shorter route when you just worry about burying the 8 cable between substation to substation. Right now you PMT2-55 9 have this long route around Robin Hood's barn. And it's 10 really affecting everybody. A lot of people are 11 concerned about the fires. 12 And yes, this past year my house insurance got 13 canceled because of the fact that the power line between 14 where I live, which is two houses away from the pole on 15 Coast Avenue and the one that stretches all the way 16 across Rancho -- what is it -- Rancho Santa Fe Road, 17 that's the longest run of power cables ever. You'll 18 never find another set of power cables that go that far. PMT2-56 19 Okay. 20 So when the insurance company took a look at 21 this past year with all the fires that were going on, 22 they said, "Hey, we have to really cancel it because 23 that is really a lot of weight." That's number one. 24 And of course, the winds come up from the canyon, that's 25 another problem. Okay.</p> <p style="text-align: right;">Page 54</p>	<p>1 about the most after two days, two sessions, is the 2 aesthetics and the wildfire. 3 And what's interesting is, is that less than PMT2-58 4 significant means that it wasn't significant to start 5 with and, therefore, nothing needs to be addressed. If 6 it is in the top two lines, you don't have to do 7 anything. The blue is just coming up from the bottom. 8 So what I'm saying here is that the wildfires, 9 you admitted, were significant. You said they could be 10 mitigated. However, all mitigation had to do with only 11 construction. 12 And several people have said here tonight there 13 was no discussion in the MND that I could find about 14 long-term wildfire mitigation. And you know why the 15 reason that is? It can't be done, except to underground 16 it or pick an alternative route. 17 And so my point tonight is that both the 18 aesthetics and the wildfire need to be considered as 19 significant. And if they're significant, they cannot be 20 mitigated, because you cannot mitigate something that's 21 an aesthetics problem. 22 If I think it's a horrible view, how are you 23 going to fix it? Again, there is one solution. Go 24 underground or pick an alternative. That's my strong 25 belief that the reason wildfire and aesthetics, which</p> <p style="text-align: right;">Page 56</p>

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<p>1 have been mentioned over and over and over, are not down 2 in the significant category is because you can't 3 mitigate them. And if they are down in the bottom where 4 it says "None," they have to recommend an EIR. 5 So my goal is to show that an EIR and that 6 several of those should go down to the bottom, that they 7 should be significant and they should be unavoidable 8 impact, because you can get rid of an aesthetic problem. 9 Earlier today I talked about wildfire impact. 10 And I'm not going to talk about that tonight. We did a 11 lot of that. I will talk about aesthetics. And this is 12 important. 13 My reason on why the environmental impact on 14 aesthetics is significant, down at the bottom, has to do 15 with CEQA 15065(a) section 3, which is not just about 16 the impact of a particular project, but the cumulative 17 impact of past, present, and future projects. And in 18 the MND I did not see mention of the past projects. We 19 have heard many people speak tonight about the impact of 20 the past project. 21 And I gave information to Joyce. It occurred 22 in 2009. It was when the wooden poles were converted to 23 the current steel gargantuan towers. 24 Why did that happen? Why did we never hear 25 anything about it? The reason is, is because of one</p> <p style="text-align: right;">Page 57</p>	<p>1 If you take into account the past project in 2009, in 2 conjunction with what they're proposing, every single 3 person in this room would agree it's significant and I 4 think you would. 5 This is a picture of how -- you can see it -- 6 of the wooden poles that were actually there in March of 7 2009. That was taken by one of our neighbors. You can 8 see the difference between the wooden poles and what 9 they put up. 10 This was the day they were constructing them. 11 That's Jason's house. And Jason's house has that giant 12 steel pole, which Mr. Primosch was just showing you. 13 The point is if you judge aesthetics from 14 today's giant steel to another set of steel, it's less 15 than significant. I don't agree, but that's what you 16 determined. You've made that determination. We can't 17 really argue that. That was your determination. 18 However, what we can argue is that the 19 cumulative impact of aesthetics is significant. And 20 that's it. You would agree that going from those small 21 60-foot, 50-foot wooden towers with three lines 22 horizontal that you can't even see to what's there or 23 going to be there, is significant. There is no way 24 around that. I will show you the other two slides. 25 MR. MANKA: Mr. Pack, could you conclude. I</p> <p style="text-align: right;">Page 59</p>
<p>1 thing and one thing only. They only have to do this 2 kind of a hearing if they have to purchase right-of-way. 3 For that project nine years ago, no right-of-way was 4 required to make a purchase, so they just did it. 5 They asked for comments. There was a 20-day 6 period. Two people in this room actually submitted 7 comments, only two people in the whole state. But they 8 denied their request and so they built the towers, and 9 there they are. 10 And here is the kicker. The way they judge by 11 the rules as whether something is an aesthetic problem, 12 i.e., significant is not -- is compared to what's there 13 today. All they care about is that that's already 14 there. If they are going to put more towers and they 15 are a little bit smaller, there is no problem. So it's 16 not significant. So I understand why they said less 17 than significant. 18 They're not saying there is no impact. They 19 are saying it is less than significant. They can't go 20 to significant. If they say significant, EIR. They 21 don't want that. 22 I shouldn't say you guys don't want that. I 23 misspeak. That needs an EIR. 24 So my point is that in the CEQA guidelines I 25 was just quoting, it's all about the word "cumulative."</p> <p style="text-align: right;">Page 58</p>	<p>1 think you submitted these. 2 MR. PACK: No, I didn't. 3 MR. MANKA: Okay. Well, I encourage you to. 4 That would be great. 5 MR. PACK: I will. I just wanted to show them. 6 This is Jason's house today. There is going to 7 be another set of poles. This is the only simulation 8 we've done so far. There is Jason's house before the 9 poles were put in with wooden poles. Do you see the 10 poles? No. Why not? Because they are too small. They 11 didn't stick up over the house, and wires, there are 12 only three wires. 13 The point is, this is a significant change. I 14 think it was significant back in 2009, but we weren't 15 allowed to participate. After this, it will absolutely 16 be significant. 17 MR. MANKA: Thank you, Mr. Pack. 18 So Kathryn Ericsson and Lindsey Smith, I don't 19 know if you still wanted to speak. I do have two people 20 that haven't spoken today. 21 AUDIENCE MEMBER: I think it is a shame that 22 Robert Pack is not talking about the fire, so everybody 23 here can hear it. You are missing something if you 24 don't hear it. 25 MR. MANKA: Could I have --</p> <p style="text-align: right;">Page 60</p>

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<p>1 AUDIENCE MEMBER: I'd like to have Robert talk 2 about the fire in my stead, please. 3 MR. MANKA: I can't give Mr. Pack more time 4 without hearing from Chantelle LaGroux first. 5 AUDIENCE MEMBER: He'll be after Kathryn. 6 MR. MANKA: I have to hear from Chantelle 7 LaGroux and Carolyn LaGroux next. 8 AUDIENCE MEMBER: You called Kathryn? 9 MR. MANKA: Ma'am, Mr. Pack spoke for eight 10 minutes. I would like to hear -- 11 MS. CHANTELLE LAGROUX: I'm going to be short. 12 MR. MANKA: Thank you. 13 MS. CHANTELLE LAGROUX: After the towers were 14 built by my house, I slowly saw my dad get sick. He 15 went into kidney failure. He developed a blood disease. 16 And I saw him succumb to his disease last year. And 17 it's just terrifying that that could happen to me next 18 or my mom. And I just wanted to tell you that. Thank 19 you. 20 MS. CAROLYN LAGROUX: I'm Chantelle's mother. 21 We have lived in Rancho Dorado since the beginning. I 22 live at 1206 White Sands Drive, which is no more than 23 60, 70 feet from one of these towers. 24 My husband was diagnosed with leukemia five 25 years ago. He worked at home 24 hours -- I mean, he was</p> <p style="text-align: right;">PMT2-61 PMT2-62</p> <p style="text-align: right;">Page 61</p>	<p>1 that 56 percent of San Diego Gas & Electric's service 2 center is in a high fire danger zone, so it's not any 3 different. It is not an unusual circumstance. 4 I can read the section and the statute of CEQA. 5 She's got it. But it says that it has to be an unusual 6 circumstance. So they ruled that because over half of 7 the SDG&E area is in high danger of wildfires, it is not 8 unusual. We don't have to deal with it. 9 Now, that was nine years ago. I have hoped 10 that they have changed and they now have a different 11 measure how they evaluate projects. I'm just telling 12 you what they said nine years ago in that report that 13 Joyce is reading right now. 14 And so what is the reason? Well, I would say 15 go for unusual circumstances. You know why? Because 16 you guys live in an area that I call cul-de-sac 17 community. You know what that is? That is when you go 18 in a cul-de-sac, you come out, and there is only one way 19 to go out. And I didn't realize it until I looked at 20 the map of San Elijo. 2700 homes. And I can count on 21 100 that only have one way out of their neighborhood. 22 If you turned left, you would hit another 23 cul-de-sac. You turn right, you get out. What does 24 that mean? One way in, one way out. There is no other 25 alternative.</p> <p style="text-align: right;">PMT2-63 (cont.)</p> <p style="text-align: right;">Page 63</p>
<p>1 home 24 hours a day. He worked from home. He died last 2 year of leukemia. That's all I have to say. 3 MR. MANKA: So the last two speakers I have are 4 Kathryn Ericsson and Lindsey Smith. If Mr. Pack will 5 speak for both of you in three minutes, we can take 6 that. 7 MR. PACK: Okay. I guess I'll speak about the 8 fire. I have a prepared speech, but I don't want to 9 talk about that. 10 What's going on with the fires, especially in 11 San Elijo Hills is that it's -- they didn't deem this to 12 be significant for wildfires long term because, again, 13 they knew that if they did, they can't mitigate it, 14 other than how to do the project. That's my theory. 15 And where I think it's significant is that it's 16 dimmer than all other systems. There is a ruling that 17 said -- in fact, this exact project that I told you 18 about nine years ago, I could read from it. I gave 19 Joyce a copy. But it actually says right in that report 20 that the -- get this. Nine years ago, they said there 21 is a wildfire danger. And that report, which they 22 didn't have to have a public meeting like this, but that 23 report said it is not significant. You know why? I 24 can't say this enough. Unbelievable. They said that, 25 yeah, it's in a high fire danger zone, and it is, but</p> <p style="text-align: right;">PMT2-63</p> <p style="text-align: right;">Page 62</p>	<p>1 Was that analyzed in this report? No. No. 2 And that makes it not only an unusual circumstance. It 3 is an extremely unusual circumstance. That is highly 4 dangerous because it's a safety issue when a wildfire 5 will occur. And I didn't say if it occurs. I said when 6 the wildfire occurs. It will occur. It's a question of 7 when. It's a question of when. 8 And if it's caused by the power -- it may not 9 be the power, but it may be. And do we want to take a 10 chance with our family, with our kids over something 11 that they can avoid? No. 12 So that's a little bit of my speech on 13 wildfire. I don't know what else I was going to talk 14 about. That's probably my six minutes. 15 MR. MANKA: So I think Dave has a couple things 16 to conclude and Joyce, but thank you very much for being 17 so considerate of each other's time. 18 As I mentioned earlier and earlier today, this 19 is our opportunity to hear from you and we really 20 appreciate you taking the time to come out here. 21 AUDIENCE MEMBER: Have we made an impact? 22 Sir, have we made an impact? 23 MR. MANKA: All the information you provided 24 has to be considered by us, so I would say yes. 25 AUDIENCE MEMBER: Thank you.</p> <p style="text-align: right;">Page 64</p>

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<p>1 MR. DAVIS: So really, folks, just in 2 conclusion, I want to remind you that we have cards in 3 the back that list every means of comment for you all. 4 We know you took the time out of your night. I do this 5 occasionally too in my neighborhood. I really do 6 appreciate the fact that you all came out. 7 We listened to you. It's appreciated. We hear 8 the emotion. We hear the feeling in it. So thank you 9 so much for coming out. 10 We're going to be around for a little bit to 11 answer any process-related questions, but please take 12 advantage of the comment system that we have. Email, 13 mail, and then we do have a comment input engine, I 14 guess, connected to our project website. So please use 15 that. You've got 30 days. Okay. 16 Thank you for coming. 17 (Proceedings concluded at 8:16 p.m.) 18 * * * * * 19 20 21 22 23 24 25</p> <p style="text-align: right;">Page 65</p>	
<p>1 2 3 REPORTER'S CERTIFICATE 4 5 I, Cynthia J. Vega, a Certified Shorthand 6 Reporter for the State of California, do hereby certify 7 that the above-referenced proceedings were reported by 8 me on Tuesday, April 30, 2019, at 3 Civic Center Drive, 9 San Marcos, California; were taken by me 10 stenographically and were transcribed through 11 computerized transcription under my direction, and the 12 foregoing is a true and correct record of the 13 proceedings taken at that time. 14 15 16 IN WITNESS WHEREOF, I have subscribed my name 17 this 13th day of May, 2019. 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">_____ Cynthia J. Vega, CSR No. 6640</p> <p style="text-align: right;">Page 66</p>	

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Comment PMT2-22 (Tom Primosch), Photo 1 of 4



Comment PMT2-22 (Tom Primosch), Photo 2 of 4



Comment PMT2-22 (Tom Primosch), Photo 3 of 4



CHAPTER 3

Revisions to the IS/MND

This Chapter presents all revisions to the following sections of the Draft IS/MND for the SDG&E San Marcos to Escondido TL6975 69kV Project: Section 0.2, Executive Summary; Section 2, Project Description; Section 3.1, Aesthetics; Section 3.3, Air Quality; Section 3.4, Biological Resources; Section 3.5, Cultural Resources; Section 3.8, Greenhouse Gases; Section 3.13, Noise; Section 3.16, Recreation; Section 3.17, Transportation; Section 3.20, Wildfire; Section 3.21, Mandatory Findings; and Section 5.0, Mitigation Monitoring, Reporting and Compliance Program.

The original Draft IS/MND is provided in Appendix A of this Final IS/MND. Revisions are shown in underline and ~~strikeout~~ to display any additions and/or removals, respectively, to the Draft IS/MND.

Executive Summary

The 3rd and 4th bullet points on page ES-2 are revised as follows:

- Construct a new single circuit power line approximately 2.8 miles in length on new dulled galvanized steel poles parallel to the existing Tie Line 13811/13825 within an existing 150-foot SDG&E ROW;
- Reconductor and re-energize approximately 7.4 miles of existing power line, as well as insulator replacement, in unincorporated San Diego County, San Marcos, and Escondido;

In Table ES-2, the following Mitigation Measures are revised as follows:

Mitigation Measure BIO-3: Avoid Jurisdictional Resources. To avoid impacts on jurisdictional areas, SDG&E and its contractor shall flag work area limits and work shall be restricted to the flagged limits. Additionally, when clearing or grading occurs within 25 feet of a jurisdictional feature, silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated run-off or sedimentation. A qualified biologist shall verify that silt fencing and construction work is properly installed and are located outside of jurisdictional areas to confirm their avoidance. Monitoring shall take place during rain events to confirm the integrity of silt fencing and verify runoff does not enter jurisdictional areas

Mitigation Measure CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&E. The Qualified Archaeologist of a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall ~~to~~ carry out all APMs and mitigation measures related to archaeological resources.

Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160. Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions

to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design shall be submitted to SDG&E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E, and submitted to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center.

Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan. To reduce daytime noise impacts due to Project construction near sensitive receptors, SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval. The Plan shall include a requirement for SDG&E to administer a noise monitoring program when construction activities are conducted within 100 feet of sensitive receptor locations to ensure that the provisions of the Plan, including those identified below, are effective in reducing construction noise levels at sensitive receptor locations to 75 dBA L_{eq} or less. The Plan shall present specific measures that identify how the construction noise limit of 75 dBA as an hourly L_{eq} at nearby sensitive receptor locations will be adhered to, how potential exceedances will be documented and corrected, and how impacts on sensitive receptors from exceedances that cannot be corrected or avoided will be mitigated, including but not limited to the following measures:

Project Description

Table 2-1, Project Summary in the Draft IS/MND on page 2-3 is revised as follows:

- Parallel to, and 50 ~~30~~ feet offset east of, existing 13811/13825 138 kV power line

Figure 2-3, Project Alignment Key Map, is revised and displayed in Appendix A.2 of this Final IS/MND.

Text under the subheading 2.2.2 “Segment 2 New Build” on Draft IS/MND page 2-10 is revised as follows:

The new segment would be constructed parallel to, and approximately 50 ~~30~~ feet east of, the centerline of the existing line. The new steel poles would be installed at the same spacing as the structures supporting the existing 138 kV power line. To accommodate the Project at Meadowlark Junction, an existing 12 kV distribution line would be reconfigured on existing equipment within the Project boundary (SDG&E, 2017).

Text on page 2-20 of the Draft IS/MND is revised as follows:

Segment 2 would have all new steel poles to accommodate a single circuit. They would range from 61 to 110 feet in height. The main line of Segment 2 would consist of 11 foundation poles and five direct-bury poles installed at the same spacing as the existing Tie Line 13811/13825 line, which the Project would parallel 50 ~~30~~ feet to the east within the SDG&E easement.

Text under the subheading “Above-Ground Installation” on Draft IS/MND page 2-21 is revised as follows:

The distance from the ground to the lowest transmission conductor would be at least 30 feet. The distance between the conductors on each pole would be approximately 9 feet. The span lengths for the Project are expected to be the same as those currently existing

along the entire Project alignment. The pole replacements and new pole placements in Segments 1 and 2, respectively, would be located ~~at~~ adjacent to or parallel to existing poles.

Text under the subheading “Reconductoring and Re-energizing” on Draft IS/MND pages 2-21 and 2-22 is revised as follows:

In Segment 1, all existing porcelain insulators would be replaced with polymer insulators and Tie Line 680C, which would be collocated with the Project, would be reconducted with aluminum-clad steel-reinforced supported wire. Within Segment 3, the existing de-energized conductor and porcelain insulators on the north side of the towers would be removed and replaced with polymer insulators and new conductors. ~~The~~ Approximately 1 mile of existing conductors in Segment 3 (the portion nearest to and connecting to the Escondido Substation) would remain in place.

Text on page 2-25 of the Draft IS/MND is revised as follows:

The Project would be constructed within this SDG&E corridor approximately 50 ~~30~~ feet east of centerline of the existing Tie Line 13811/13825 structures. All of the new steel poles would have graded roads and access/maintenance pads built to them to facilitate construction and provide long-term maintenance access. Construction access and permanent access are currently provided by existing SDG&E easements and SDG&E franchise rights. No additional land acquisition for access purposes is proposed.

Text on page 2-27 of the Draft IS/MND is revised as follows:

Although nighttime construction is not ~~anticipated~~ proposed except where required by local ordinances, it may be required as a result of a condition of an agency permit or local traffic control direction from one of the study area jurisdictions. Therefore, this analysis will consider the possibility of limited nighttime work.

Text on page 2-50 under the sub-heading “Deep Well Installation” is revised as follows:

The trenches would be excavated using backhoes. Once the wire is connected to the pipe and SSD mechanisms, the trench would be backfilled and ground cover returned to its original condition. Deep well installation could require lane closures on West San Marcos Boulevard.

Aesthetics

As described in Master Response 1, Aesthetics, in Final IS/MND Section 2.3.1, in response to comments received on the Aesthetics assessment, CPUC staff requested that SDG&E provide photographs of existing conditions and visual simulations of the Project at five additional viewpoints (VPs) or Key Observation Points (KOPs). As a result, new figures were added, existing figures were renumbered, and new text was included in paragraph form and in tables in the aesthetics analysis to incorporate this information. The revisions in the Aesthetics section are numerous, but many are minor though important editorial changes that reflect incorporation of the

analysis of these new points. In order to provide context for readers, the entire Section 3.1 is provided as revised in underline and strikeout, rather than excerpts provided here.

The CPUC notes that this analysis is not being recirculated as the term is used in the CEQA Guidelines (i.e., Pub. Res. Code §15073.5), because no “substantial revision” has been made. A “substantial revision” to a negative declaration would mean:

- a. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificant, or
- b. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required.

Neither of these conditions has been triggered. Rather, the revisions to the aesthetics section demonstrate that new information was added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration; therefore, recirculation is not required (Pub. Res. Code §15073.5(c)(4)).

3.1 Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1. AESTHETICS — Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

For the purposes of this analysis, the visual environmental impact is based on review of a variety of data provided by SDG&E as independently verified by the CPUC, including Project maps, drawings, aerial and ground level photography of the study area, local planning documents, and computer-generated visual simulations. The study area defined for this aesthetics analysis includes the landscapes directly affected by the Project and the surrounding areas from which the Project would be visible.

3.1.1 Environmental Setting

Aesthetic impacts may occur if a project would alter the perceived visual quality of the environment. This can result from changes to the visual character of the area, alteration of a scenic vista, changes to a scenic resource, or creation of a new source of light or glare that would affect views in the area. They are defined as follows:

- **Visual character** refers to the features of the natural (e.g., landforms, vegetation, rock and water features) and built (e.g., buildings, utility infrastructure) features of the landscape that contribute to the public's experience and appreciation of the environment.
- A **scenic vista** is generally considered to be a location from which the public can experience unique and exemplary views, which are typically from elevated vantage points that offer panoramic views of great breadth and depth.
- **Scenic resources** are specifically defined as features that are visible from a state scenic highway.
- **Light** is the amount of luminance emitted from an object and **glare** is the result of a large contrast in luminance between a bright light source and dark background within a viewer's field of vision.

The degree of impact also depends on viewer sensitivity to aesthetic changes. For this analysis, viewer sensitivity is categorized into high, moderate, and low visual sensitivity ranges. These ranges are based on a composite measurement of the overall susceptibility of an area or viewer group to adverse visual or aesthetic impacts, given the combined factors of:

- **Visual quality:** the overall visual impression or attractiveness of an area as determined by the particular landscape characteristics, including landforms, rock forms, water features, and vegetation patterns.
- **Viewer types and volumes of use:** the types of people viewing the affected landscape including, for example, motorists traveling on nearby roadways, park and other recreational area users, as well as residents and business patrons in Carlsbad, Escondido, Vista, San Marcos, and unincorporated San Diego County. Land uses that derive value from the quality of their settings, such as parks or scenic routes, are considered particularly sensitive to changes in visual setting conditions.
- **Viewer exposure:** landscape visibility, viewing distance, viewing angle, extent of visibility, and duration of view. For the purposes of this analysis, viewing distance is described in three general categories. Foreground refers to views observed from within 0.25 to a 0.5 mile from viewer; middle-ground refers to views from the foreground out up to three to five miles from the viewer; background extends from that middle-ground distance outward, as far as the view extends.

Visual Quality of the Region

The Project would be located within the coastal hills of San Diego County's northern valley, near Lake San Marcos, the San Elijo Hills, and Double Peak Regional Park. Elevations along the Project alignment range from 500 to 1,150 feet above sea level. The Project crosses diverse terrain with a variety of vegetation communities. As rainfall is very limited in the region, native vegetation is typically sparse, consisting of low growing chaparral and coastal sage scrub on the mesas (flat-topped hills). However, riparian vegetation is present along ravines and in canyon drainages. Open areas of exposed rock and light-colored soil are common elements of this landscape. The study area is comprised of urban/developed land, orchards/vineyards, intensive agricultural areas, coastal sage scrub, chaparral, grasslands, wetlands, marshes, riparian forests, woodlands, and freshwater areas. Scenic landscape features in this area include surrounding hillsides, Lake San Marcos, Rancho La Costa Preserve, Diamond Trail Preserve, and Escondido Creek Preserve.

The Project would traverse the cities of San Marcos, Escondido, Vista, and Carlsbad, as well as areas of unincorporated San Diego County. It would be located along a variety of land uses, including residential, commercial, industrial, open space/park/recreation, agriculture, public/institutional, roads, freeways, undeveloped/vacant land, access roads, and mixed-use land uses. The majority of Segment 1 is adjacent to San Marcos Boulevard, as well as commercial, industrial, and residential development in an urban area. Segment 2 would be located primarily in residential and open space areas. Segment 3 would traverse residential areas, undeveloped/open space, rolling hills, and industrial and commercial areas.

Within the study area there are numerous above-ground electric utility components, including poles, transmission infrastructure, and overhead conductors supporting existing power lines, as well as two existing substations. The Project would be situated between two major regional interstate highway corridors: Interstate 5 (I-5), located approximately 5 miles to the west, and I-15, approximately 1 mile to the east. By design, the local roadways in this part of San Diego generally follow curved patterns, following the natural topography of the adjacent hillsides.

Scenic Highways. There are no highways within 1 mile of the Project that are designated or eligible for State scenic designation by the California Department of Transportation

(Caltrans). The nearest Eligible State Scenic Highway is I-5, approximately 5 miles west of the Project (Caltrans, 2011).

Scenic Vistas. There are no officially designated scenic vistas in the study area. However, scenic vistas ~~views~~ are available from ~~informal~~ recreation areas in Rancho La Costa Preserve, Diamond Trail Preserve, and Escondido Creek Preserve, as well as Simmons Family Park.

Light and Glare. Much of the Project study area is comprised of developed and urbanized lands where nighttime lighting is part of the built environment, which includes vehicle headlights, street lighting, parking lot lighting, security lighting, building lighting, as well as various other sources of light from surrounding commercial, industrial, and residential uses. However, light conditions in the open space areas, preserves, and undeveloped lands crossed by the Project are typically darker with the primary light source being associated with nearby streets and vehicles.

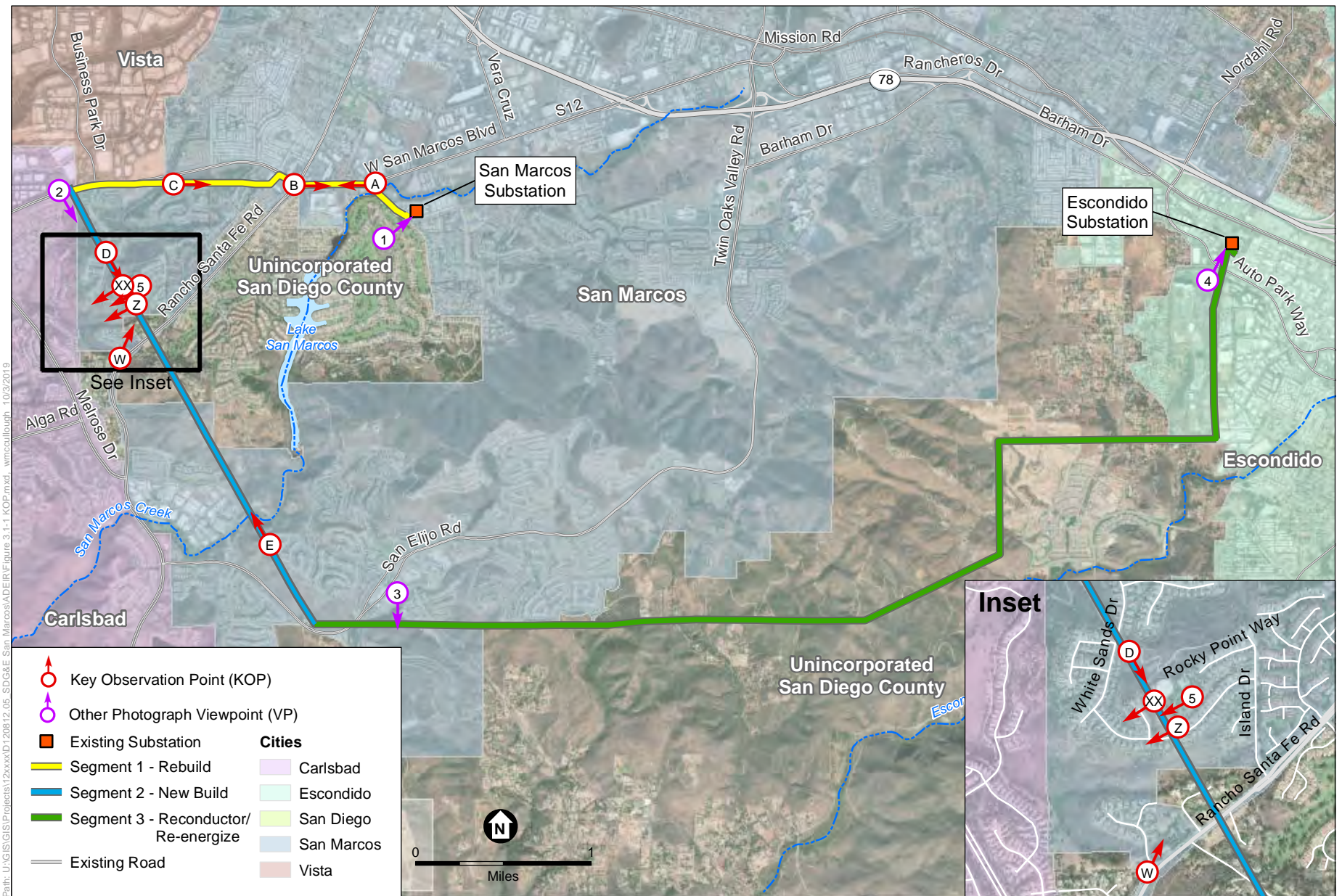
Visual Character. Figure 3.1-1 shows the locations of Project components and photograph viewpoints (VP). ~~Figures 3.1-2 through 3.1-10-15~~ present nine 14 photographs showing existing representative visual conditions and public views within the study area. To facilitate this impact analysis, ~~five-nine~~ of these VPs were chosen as representative key observation points (KOP) – VPs which could have higher viewer sensitivity due to location, number of viewers, visual surroundings, etc. The impact analysis includes visual simulations of these ~~five nine~~ KOPs showing the existing view juxtaposed with a simulated view with the Project in place.

Table 3.1-1 presents the five primary components of the Project in terms of potentially affected viewers and representative photographic views (if applicable). Where notable visual changes could occur, the Project's appearance is shown in a set of before-and-after views, as seen from key public viewpoints listed under "Visual Simulation" within Table 3.1-1.

**TABLE 3.1-1
SUMMARY OF PROJECT COMPONENTS, PRIMARY VIEWERS,
REPRESENTATIVE PHOTOGRAPHS, AND VISUAL SIMULATIONS**

Proposed Project Component (Existing View)	Potentially Affected Viewers	Key Observation Point (KOP)	Visual Simulation
San Marcos Substation (Figure 3.1-2)	Users of St. Mark's Golf Club; residents near substation; drivers, bikers, and pedestrians on Discovery Street.	N/A	No simulation
Segment 1 (Figures 3.1-3 through 3.1- 56)	Users of St. Mark's Golf Country Club; students and faculty at San Marcos High School; students and faculty at Valley Christian School; workers and patrons near the intersection of West San Marcos Boulevard and Rancho Santa Fe Road; drivers, bikers, and pedestrians on West San Marcos Boulevard; residents along the transmission line.	A through C, <u>Y</u>	Figures 3.1-11 through 3.1-13
Segment 2 (Figures 3.1- 67 through 3.1- 813)	Publicly accessible points in residential areas along the transmission line; Workers and patrons associated with commercial development along Melrose Drive; drivers, bikers, and pedestrians on White Sand Drive, South Rancho Santa Fe Road, Via Alondra, Via del Corvo, <u>Coast Avenue</u> , Melrose Drive, and San Elijo Road; users of Simmons Family Park, Diamond Trail, and the Rancho La Costa Preserve.	D through E, <u>W, XX, Z</u>	Figures 3.1-14 through 3.1-15
Segment 3 (Figure 3.1- 914)	Users of the Sage Hill Preserve, Escondido Creek Preserve, Escondido Creek; workers in warehouses and offices north of Harmony Grove Road; workers and patrons of commercial development along Citracado Parkway and surrounding the substation; drivers, bikers, and pedestrians on San Elijo Road, Elm Forest Road, Questhaven Rd, Harmony Grove Road, Citracado Parkway, and Auto Park Way.	N/A	No simulation
Escondido Substation (Figure 3.1- 4015)	Workers and patrons of surrounding commercial and industrial development.	N/A	No simulation

SOURCE: ESA, 2018, 2019



SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-1
Key Observation Point and Viewpoint Locations

San Marcos Substation

The San Marcos Substation (VP 1) is located on a 1.87-acre industrial site within an urbanized area of the City of San Marcos. It is surrounded by single-family housing, with Discovery Street creating a southwest boundary and has two power lines that access the substation. Much of the existing substation is obscured from view due to the presence of an 8-foot-tall wall and landscaping (see **Figure 3.1-2**).



Figure 3.1-2
VP 1, View of San Marcos Substation from Discovery Street –
Looking Northeast

Segment 1

Segment 1 is approximately 1.8 miles long and includes a single-circuit, 69 kV transmission line primarily on wooden poles ranging from 20 to 83 feet tall. It runs north past the St. Mark's Golf Club, then travels west along West San Marcos Boulevard past San Marcos High School and commercial businesses and offices near the West San Marcos Boulevard/South Rancho Santa Fe Road intersection. West of the intersection, the segment is located approximately 400 feet south of West San Marcos Boulevard for approximately 0.75 mile, traversing interspersed residential and open space areas. The westernmost 2,000 feet of the segment is adjacent to West San Marcos Boulevard, with office/commercial development to the north and residential development to the south.

~~Three~~Four representative photographs (KOPs A, B, ~~and C~~, and Y) were taken from various locations along the segment to document existing conditions. These representative KOPs will be used to analyze the potential visual impact of the Project.

Figure 3.1-3 (KOP A) provides views looking west from the intersection of West San Marcos Boulevard and Discovery Street. The visual character of is defined by the surrounding constructed environment, including commercial/office buildings, a multi-unit residential complex on the north side of the roadway and the San Marcos High School campus on the south side. The developed visual character of this area is softened by the presence of landscaping and street trees. From this location, the transmission poles and lines are a prominent feature. Located between the San Marcos High School sports field and West San Marcos Boulevard, the existing transmission infrastructure is the tallest feature in foreground of the view. However, the transmission poles and line reduces in prominence in the background of the view where, due to the distance, it begins to have a similar visual dominance as the field lighting to the south and the trees along West San Marcos Boulevard to the west. Given the developed nature of the surroundings, the visual sensitivity in the area of KOP A is low to moderate.



Figure 3.1-3
KOP A, West San Marcos Boulevard & Discovery Street –
Looking West

Figure 3.1-4 (KOP B) is the view to the east from the intersection of West San Marcos Boulevard and Rancho Santa Fe Road. From this location, the transmission poles and line are the prominent feature in the foreground, taller than the surrounding two- to three-story commercial/office development and San Marcos High School main building in the middle ground. The poles also above the horizon defined by the hillside in the background. Within the view, the prominence of the transmission poles and lines lessens as the discernable height difference between the transmission infrastructure and the hillside begins to decrease with increased distance from the KOP. Given the developed nature of the surroundings, the visual sensitivity in the area of KOP B is low to moderate.



Figure 3.1-4
KOP B, West San Marcos Boulevard & South Rancho Santa Fe Road –
Looking East

Figure 3.1-5 (KOP C) shows a view to the east, through a neighborhood greenbelt and SDG&E right-of-way (ROW), from Acacia Drive immediately south of West San Marcos Boulevard. The relative prominence of the transmission poles and line is low due to the topography of the view (i.e., looking uphill) and presence of vegetation of similar height. A single-family neighborhood is immediately to the right out of view. West San Marcos Boulevard, and another single-family neighborhood to the north of it, is out of view to the left beyond the nature trees. The existing line would also be visible to those who use the SDG&E ROW access road for recreation. With the view limited by topography and dominance of the existing power line, the visual sensitivity in the area of KOP C is low to moderate.



Figure 3.1-5
KOP C, West San Marcos Boulevard & Acaçdia Drive Street—
Looking East

Figure 3.1-6 (KOP Y) is the view to looking east along Palomar Airport Road/West San Marcos Boulevard toward its intersection with White Sands Drive/Business Park Drive. From this location approximately 0.25 mile west of the intersection, this view is intended to represent a “gateway” view as drivers enter the City of San Marcos. Here the existing electric transmission infrastructure (i.e., TL 13811/13825, TL 680C) is the prominent feature in the foreground, taller than the surrounding landscape trees on the south side of the roadway and in the median. The horizon beyond the landscape trees and infrastructure is composed of commercial development and additional landscape plantings. Given the presence of infrastructure and development on the visual horizon, the visual sensitivity in the area of KOP Y is low to moderate.



Figure 3.1-6
KOP Y, Palomar Airport Road/West San Marcos Boulevard –
Looking East

Segment 2

Segment 2 is approximately 2.8 miles long and includes an existing ~~single~~ double-circuit, 138 kV transmission line on steel poles approximately 68 to 109 feet tall. It runs southeast through single-family residential areas and hilly, undeveloped open space areas that contain trails. A number of other transmission and distribution lines on metal and wooden poles are also present at Meadowlark Junction.

~~Three~~ Seven representative photographs (including KOPs ~~D and E~~, W, XX, and Z) document existing conditions.

Figure 3.1-6-7 (VP 2) provides a representative long distance view of the existing power line as it traverses neighborhoods and undeveloped areas in San Marcos and unincorporated San Diego County. This view looks southeast from the intersection point of Segments 1 and 2 along Palomar Airport Road in the City of Carlsbad. White Sands Drive is the paved roadway in the middle view. The dirt SDG&E access road runs under the existing power line, also in the middle view.

Figure 3.1-7-8 (KOP D) is a view looking southeast from White Sands Drive uphill toward a water storage tank at the crest of the hill in western San Marcos. From this location, the existing transmission poles and line and water tank are the prominent features. The poles are noticeably taller than surrounding one to two-story houses, the water tank, and surrounding low-lying vegetation. The transmission poles and line are also visible on the horizon as the power line crests the hill, increasing their prominence. Single-family residences are just out of view to either side of the simulation. Out of view, Simmons Family Park is located to the left (northeast) of the water tank just over the crest of the hill. Although there is existing abundant landscaping and the undeveloped portion of the hill are quite noticeable in the view, the existing utility structures, including street lighting, dominate the view, making the visual sensitivity moderate.



Figure 3.1-67
VP 2, View from Palomar Airport Road –
Looking Southeast



Figure 3.1-78
KOP D, White Sands Drive & Sea Island Place –
Looking Southeast

Figure 3.1-9 (KOP W) is a view looking north along South Rancho Santa Fe Road near its intersection with Brighton Glen Road. Like KOP Y, this view is intended to represent a “gateway” view as drivers enter the City of San Marcos. From this vantage point, the viewer is looking toward a hillside with the homes along Brighton Hill Court and Via Cancion. The foreground view is dominated by landscape trees and other plantings. A privacy wall and rail fence frame the landscaping. The visual horizon is defined by the homes along the ridgeline and existing TL 13811/13825 parallel above the ridgeline. Although there is existing abundant landscaping and the undeveloped portion of the hill is noticeable in the view, the existing residential development and electric infrastructure makes the visual sensitivity moderate.



Figure 3.1-9
KOP W, South Rancho Santa Fe Road –
Looking North

Figure 3.1-10 (VP 5) is a view looking west from the Simmons Family Park playfield. This view is limited to the playfield and picnic areas, as the trees enclose the view and block views beyond the picnic area. The existing TL 13811/13825 transmission line is visible intermittently through the trees, which tends to shield the playfields from views of the transmission line somewhat. Although this view is of a visually appealing park setting, it is limited to the park. Given the limited view, the visual sensitivity at this site is moderate.



Figure 3.1-10
VP 5, Simmons Family Park Playfield –
Looking West

Figure 3.1-11 (KOP XX) is a view looking west from the Simmons Family Park picnic area which is visible in Figure 3.1-10. This view is enclosed in the foreground by the perimeter sidewalk and trees. Views of the residential development immediately to the west of the park are blocked by topography; this residential development is lower in elevation. The existing TL 13811/13825 transmission line visually dominates the middleground view. Beyond it, the background view encompasses the area's terrain overlain by residential and other development in Carlsbad. Trees, landscaping, and other vegetation visually soften the developed nature of the background view. A horizon line is evident in the distance beyond the background view, but its features are undistinguishable. While this view provides an expansive panoramic view, the visual sensitivity at this KOP is considered moderate as it defined by development in neighboring communities.



Figure 3.1-11
KOP XX, Simmons Family Park Picnic Area –
Looking West

Figure 3.1-12 (KOP Z) is a view along Coast Avenue looking west in western San Marcos immediately to the south of Simmons Family Park. This KOP is intended to represent the view from publicly accessible points in residential developments in the Project area. This foreground view is dominated by the existing residential development, with the TL 13811/13825 transmission line visible over the roofs. The existing transmission poles and lines, located in SDG&E ROW, traverse the development and visually protrude over rooflines. The residential development visually frames the roadway as it moves into the middleground view. Just beyond that in the center of this view, the background view is defined by a distant ridgeline. Undefined development is evident below this ridgeline in the small portion of background view available from this KOP. This distant ridgeline ties in with the rooflines of the residences on Coast Avenue to define the visual horizon. Given the limited background view and dominance of residential development in the foreground, the visual sensitivity at this KOP is considered moderate.



Figure 3.1-12
KOP Z, Coast Avenue –
Looking West

Figure 3.1-13 (KOP E) is a view from Brookside Court in southwest San Marcos looking northwest beyond two-story homes. This foreground view is dominated by the existing residential development, with the surrounding undeveloped terrain just visible over the roofs. The existing transmission poles and line are located in SDG&E ROW immediately west of the development and visually protrude into the horizon over the composite roofline. Above this roofline, they are unobscured by other built or natural features. The existing power line, street lighting, and dense residential development makes the visual sensitivity at KOP E moderate.



Figure 3.1-813
KOP E, Brookside Court –
Looking Northwest

Segment 3

Segment 3 is approximately 7.4 miles long and includes a de-energized transmission line on lattice towers approximately 145 to 170 feet tall. Segment 3 traverses residential areas, undeveloped/open space, rolling hills, and industrial and commercial areas. For the most part, Project improvements would be limited to reconductoring and re-energizing the line, which would utilize the existing structures and not change the existing appearance of these structures. **Figure 3.1-9 14** (VP 3) documents the visual appearance of Segment 3 along the Project's southern extent in San Marcos and east into unincorporated San Diego County. The existing visual sensitivity along Segment 3 is low.



Figure 3.1-914
VP 3, View of Segment 3 from Cooper Creek Apartments South Parking Lot – Looking South

Escondido Substation

The Escondido Substation is located on a 6-acre industrial site within an urbanized area of Escondido, and is surrounded by warehouses, parking lots, and 11 power lines that currently access the substation (see **Figure 3.1-105** [VP 4] and Table 3.1-1).

**Figure 3.1-105**

VP 4, View of Escondido Substation from Citracado Parkway –
Looking North

3.1.2 Regulatory Setting

Federal

No federal regulations are applicable to the Project regarding visual resources.

State

California Department of Transportation: Scenic Highway Program

The California legislature created the Scenic Highway Program in 1963 to protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. State requirements in the Streets and Highways Code, Section 260, et seq., govern the Scenic Highway Program. A highway may be designated as “scenic” depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the travelers’ enjoyment of the view. The Scenic Highway System includes highways that are either eligible for designation or have been designated as such.

The status of a State scenic highway changes from “eligible” to “officially designated” when the local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for scenic highway approval, and receives the designation from Caltrans. A city or county may propose adding routes with outstanding scenic elements to the list of eligible highways; however, State legislation is required for designation.

The nearest State Scenic Highway of any status is I-5 (an eligible State Scenic Highway) which is approximately 5 miles to the west of Segment 2 of the Project (Caltrans, 2011, 2017⁸).

Local

The California Public Utilities Commission (CPUC) has sole and exclusive state jurisdiction over the siting and design of the Project. Pursuant to CPUC General Order (GO) 131-D, Section XIV.B, “Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the CPUC’s jurisdiction.” The discussion below presents local policies and regulations for informational purposes only; CPUC does not consider these regulations “applicable” as that term is used in CEQA.

County of San Diego

San Diego County General Plan

Chapter 3, the Land Use Element, of the San Diego County General Plan, contains provisions regarding siting utilities within preserve areas that would be relevant to the portion of the Project within SDG&E ROW in the Sage Hills Preserve.

Policy LU-12.4: Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas.

Chapter 5, the Conservation Element, contains a general discussion of visual resources. Specifically, it contains a dark-skies policy, policies related to undergrounding utilities, and policies related to scenic county routes. The following goals and policies from the Conservation and Open Space Element of the San Diego General Plan pertain to the preservation of scenic resources (County of San Diego, 2011):

Goal COS-11: Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.

Policy COS-11.1: Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.

Policy COS-11.5: Coordinate with the California Public Utilities Commission, power companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that affect visually sensitive areas, whenever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.

Policy COS-11.7: Require new development to place utilities underground and encourage “undergrounding” in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and keep pace with current and future technologies.

Goal COS-12: Ridgelines and steep hillsides that are preserved for their character and scenic value.

Policy COS-12.1: Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

Policy COS-12.2: Require development to preserve physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.

San Diego County Zoning Ordinance

The San Diego County Zoning Ordinance contains regulations that apply to designated scenic areas, including scenic highway corridors and areas adjacent to significant recreational, historic, or scenic resources, such as the Sage Hills Preserve. These regulations include provisions for undergrounding utilities, grading, signage, and lighting.

5202 Application of the Scenic Area Regulations

The Scenic Area Regulations shall be applied to areas of unique scenic value, including, but not limited to, scenic highway corridors designated by the *San Diego County General Plan*, and areas adjacent to significant recreational, historic, or scenic resources, including, but not limited to, federal and state parks.

5210 Site Plan Review Criteria

- a. **Aboveground Utilities.** Utilities shall be constructed and routed underground, except in those situations where natural features prevent undergrounding or where safety considerations necessitate aboveground construction and routing. Aboveground utilities shall be constructed and routed to minimize detrimental effects on the visual setting of the designated area. Where it is practical, aboveground utilities shall be screened from view from either the scenic highway or the adjacent scenic, historic, or recreational resource by existing topography, by the placement of buildings and structures, or by landscaping and plantings that harmonize with the natural landscape of the designated area.
- b. **Grading.** The alteration of the natural topography of the site shall be minimized and shall avoid detrimental effects on the visual setting of the designated area and the existing natural drainage system. Alterations of the natural topography shall be screened from view from either the scenic highway or the adjacent scenic, historic, or recreational resource by landscaping and plantings that harmonize with the natural landscape of the designated area, except when such alterations add variety to or otherwise enhance the visual setting of the designated area.
- c. **Signs.** Off-site signs shall be prohibited in areas that are subject to the Scenic Area Regulations. The number, size, location, and design of all other signs shall not detract from the visual setting of the designated area or obstruct significant views. Subsequent to site plan review and approval, any alteration to signs, other than general maintenance, shall be subject to an Administrative Permit.
- d. **Lighting.** The interior and exterior lighting of buildings and structures and the lighting of signs, roads, and parking areas shall be compatible with the lighting employed in the designated area.

City of Carlsbad General Plan

The City of Carlsbad General Plan designates open space to preserve aesthetic, cultural, and educational resources. Landforms that are protected under the General Plan include, but are not

limited to, trails, preserves, hillsides, and habitats. There are no specific goals, policies, or ordinances that would be relevant to aesthetic concerns associated with utility projects (City of Carlsbad, 2015).

City of Escondido General Plan

The City of Escondido General Plan suggests that significant visual resources, such as ridgelines, hillsides, and viewsheds, should be preserved if they “serve as a scenic amenity and contribute to the quality of life for residents.” I-15 is designated as a scenic corridor in the Plan. However, there are no specific goals, policies, or ordinances that would be relevant to aesthetic concerns associated with utility projects (City of Escondido, 2017).

City of San Marcos General Plan

Valued scenic landforms that are noted in the City of San Marcos General Plan include, but are not limited to, undeveloped hillsides, prominent landforms, creek corridors, and historic buildings. There are no specific goals, policies, or ordinances that would be relevant to aesthetic concerns associated with utility projects. However, State Route 78 is designated by the City of San Marcos as a view corridor and eligible as a State Scenic Highway (City of San Marcos, 2013).

City of San Marcos Resolution 2002-5865

San Marcos City Council Resolution 2002-5865 directs the City Manager to require that routine maintenance, repair, and/or installation work in the San Marcos Boulevard public right-of-way, from Knoll Road to the westerly city limits, that necessitates a lane closure in either direction, must occur during nighttime off-peak hours (i.e., 7:00 p.m. to 6:00 a.m.) or on weekends (City of San Marcos, 2002).

City of Vista General Plan 2030

The City of Vista General Plan 2030 was prepared to guide the physical development of the incorporated city and any land outside of the city’s boundaries that bear a relationship to its planning activities. The General Plan states that parks, designated open space, and places, buildings, and objects that embody the city’s history should be preserved. However, there are no specific goals, policies, or ordinances that would be relevant to aesthetic concerns associated with utility projects (City of Vista, 2012).

3.1.3 Applicant Proposed Measures

No Applicant Proposed Measures (APMs) have been identified by SDG&E to address impacts to aesthetics.

3.1.4 Environmental Impacts

Methodology

~~The Project is not located in an urbanized area, as defined in CEQA Guidelines Section 15387, and as mapped by the U.S. Census⁺. Therefore, this analysis is based on the Project being in a non-~~

⁺ 2010 Census Urbanized Area Reference Maps: <https://www.census.gov/geo/maps-data/maps/2010ua.html>

~~urbanized area.~~ The visual impact assessment is based on evaluation of the changes to the existing visual environment that would result from construction and operation of the Project, and viewer response to that change. The analysis is based on review of information provided by SDG&E as independently verified on behalf of the CPUC, including project maps, drawings, aerial and ground-level photography of the study area, local planning documents, and computer-generated visual simulations. Field observations were conducted on April 11, 2018 to document existing visual conditions and to document potentially affected sensitive viewing locations. The methodology utilized in this analysis is adapted from an approach to visual impact assessment developed by the Federal Highway Administration (DOT, 2015).

An adverse aesthetic impact may occur when: (1) an action (i.e., a “project”) perceptibly changes the existing physical features of the landscape that are characteristic of the region or locale; (2) an action introduces new features to the physical landscape that are perceptibly uncharacteristic of the region or locale, or become visually dominant in the viewshed; or (3) an action blocks or totally obscures aesthetic features of the landscape. The degree of visual impact depends on the noticeability of the adverse change. The noticeability of a visual impact is a function of a project’s features, context, and viewing conditions (angle of view, distance, and primary viewing directions). The key factors in determining the degree of visual change are visual contrast, project dominance, and visual screening. The interaction of visual change with the components of visual sensitivity (visual quality, viewer types and volumes, and viewer exposure; see Section 3.1.1, *Environmental Setting*) is discussed below under “Overall Adverse Visual Impact.”

Visual Contrast

Visual contrast is a measure of the degree of change in line, form, color, and texture that a project would create, when compared to the existing landscape. Visual contrast ranges from “none” to “strong”, and may be characterized as:

- **None** –The element contrast is not visible or perceived;
- **Weak** –The element contrast can be seen, but does not attract attention;
- **Moderate** –The element contrast begins to attract attention and begins to dominate the characteristic landscape; and
- **Strong** – The element contrast demands the viewer’s attention and cannot be overlooked.

Project Visual Dominance

Project visual dominance is a measure of the apparent size of a project component relative to other visible landscape features in the viewshed, or seen area. The visual dominance of a component is affected by its relative location in the viewshed and the distance between the viewer and the project component.

Visual Screening

View screening (blockage or impairment) is a measure of the degree to which a project would obstruct or block views to aesthetic features due to its position and/or scale. Blockage of aesthetic

landscape features or views can cause adverse visual impacts, particularly in instances where scenic or view orientations are important to the use, value, or function of the land use.

Overall Adverse Visual Impact

Overall adverse visual impact reflects the composite visual changes to both the directly affected landscape and from sensitive viewing locations. The visual impact levels referenced in this analysis indicate the relative degree of overall change to the visual environment that the Project would create, considering visual sensitivity, visual contrast, view blockage, and the Project's visual dominance. In general, the determination of impact significance is based on combined factors of visual sensitivity and the degree of visual change that the Project would cause.

Table 3.1-2, *Guidelines for Determining Adverse Visual Impact Significance*, shows how the inter-relationship of these two overall factors determines the level of significance of visual impacts and presents the impact classifications used in this analysis.

**TABLE 3.1-2
GUIDELINES FOR DETERMINING ADVERSE AESTHETIC IMPACT SIGNIFICANCE**

Overall Visual Sensitivity	Overall Visual Change				
	Low	Low to Moderate	Moderate	Moderate to High	High
Low	No Impact	No Impact	Less than significant	Less than significant	Less than significant
Low to Moderate	No Impact	Less than significant	Less than significant	Less than significant	Less than significant
Moderate	Less than significant	Less than significant	Less than significant	Potentially Significant	Potentially Significant
Moderate to High	Less than significant	Less than significant	Potentially Significant	Potentially Significant	Significant
High	Less than significant	Less than significant	Potentially Significant	Significant	Significant

DEFINITIONS:

No Impact. Effects may or may not be perceptible, but are considered minor in the context of existing landscape characteristics and view opportunity.

Less than Significant. Impacts are perceived as negative, but do not exceed environmental thresholds.

Potentially Significant. Impacts are perceived as negative and may exceed environmental thresholds depending on project- and site-specific circumstances (e.g., orientation of the viewer).

Significant Impacts. Impacts with feasible mitigation may be reduced to less-than-significant levels or avoided altogether. Without mitigation or avoidance measures, significant impacts would exceed environmental thresholds.

SOURCE: ESA, modified from Federal Highway Administration (DOT, 2015).

To document the visual change that would occur, visual simulations are included. They present before and after images showing the Project from the key observation points, or KOPs, identified in Section 3.1.1. The simulated images present the location, scale, and appearance of the Project as it would be seen from publicly accessible KOPs within the study area. The KOP locations were selected to represent views seen by the largest number of public viewers; for this Project, such locations are located within public portions of residential areas and along public roadways. As shown in Figures 3.1-11 through 3.1-15, the visual simulations are illustrated as an existing view with a simulation below that portrays the Project from the corresponding KOP.

Discussion

a) Whether the Project would have a substantial adverse effect on a scenic vista: **LESS THAN SIGNIFICANT IMPACT.**

While there are no officially designated scenic vistas in the study area, some trail users and local residents hold long distance and/or panoramic views from elevated portions along Project area trails as scenic vistas. The Project could be visible in long distance views from some locations in the Rancho La Costa Preserve, Diamond Trail Preserve, Sage Hill Preserve, and Escondido Creek Preserve. The Project could also be visible in the panoramic view available from the picnic area at Simmons Family Park in San Marcos near Segment 2. Table 3.1-3, *Scenic Vistas*, identifies the preserves and park, the associated views, and whether the Project would affect those views.

**TABLE 3.1-3
SCENIC VISTAS**

Preserve	Associated Segment	Scenic Views	View Obstruction?
Rancho La Costa Preserve	Segment 2	Batiquitos Lagoon, Box Canyon and the Pacific Ocean	No, Project is located to the east behind the viewer
Diamond Trail Preserve	Segment 2	Pacific Ocean	No, Project is located to the east behind the viewer
<u>Simmons Family Park picnic area</u>	<u>Segment 2</u>	<u>Elevated views of Rancho La Costa Preserve and the City of Carlsbad</u> <u>No designated scenic vistas</u>	<u>Potential, co-located with existing power line</u>
Sage Hill Preserve	Segment 3	<u>Diegan coastal sage scrub, southern maritime chaparral, and a canyon with a small perennial stream</u> <u>No designated scenic vistas</u>	No, minimal change due to continued presence of power line
Escondido Creek Preserve	Segment 3	<u>Multiple ridgelines and valleys consisting of predominantly chaparral vegetation</u> <u>No designated scenic vistas</u>	No, minimal change due to continued presence of power line

SOURCE: Parks and Recreation County of San Diego, 2010; City of Carlsbad, 2018; The Escondido Creek Conservancy, 2018; Parks and Recreation County of San Diego, 2011.

As noted in Chapter 2.0, *Project Description*, the Project does not propose to construct and operate electrical infrastructure along any segment where some form of infrastructure does not currently exist. In Segment 1, existing poles would be replaced and an additional electrical circuit would be added to the circuit on the existing poles. While the Project would involve the construction of a new power line, it would be co-located with an existing larger power in SDG&E ROW. The Project would be designed such that the new power poles supporting the Project would be spaced at the same interval as the existing poles, thereby limiting visual contrast. The re-energization of Segment 3 would utilize existing poles and towers, which would not change the physical appearance of these facilities.

While Segment 2 would involve the construction of a new power line, it would be co-located with an existing larger power line within the SDG&E ROW (i.e., TL 13811/13825). Segment 2 would be designed such that the new power poles supporting the TL 6975 power lines would be spaced

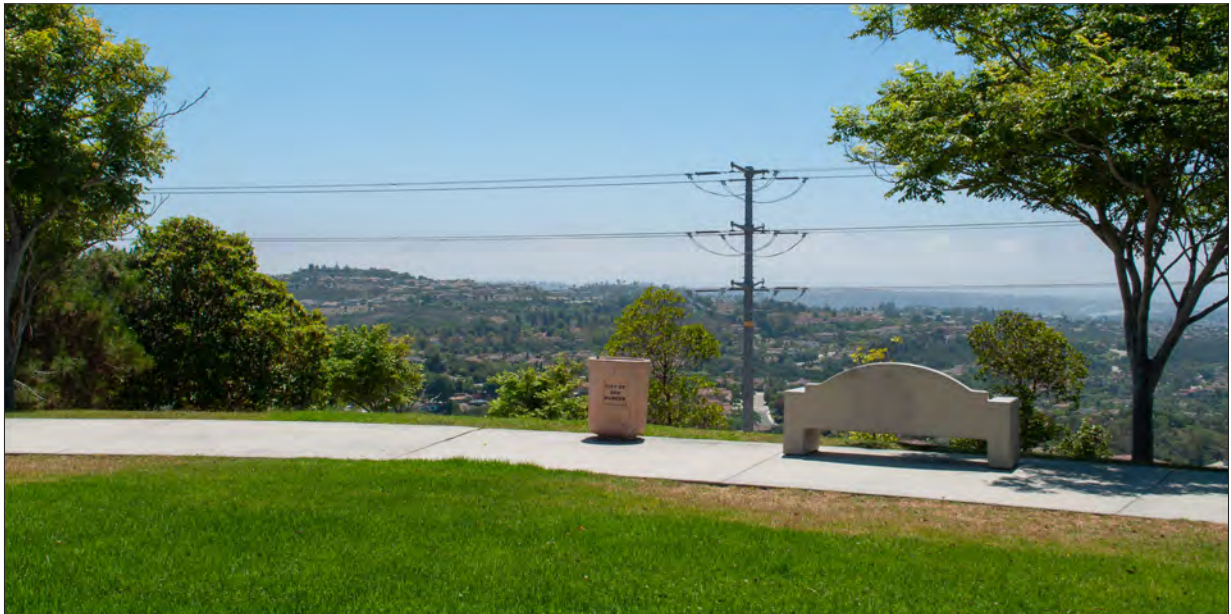
at the same interval as and co-located with the existing TL 13811/13825 poles, thereby limiting visual contrast. This is illustrated in **Figure 3.1-16, KOP XX Existing and Proposed Conditions at Simmons Family Park Picnic Area – Looking West**. The top view shows the existing line as viewed from the Simmons Family Park picnic area. It currently dominates the panoramic view as an element in the foreground. In the bottom simulated view showing the Project, a new pole is visible near the existing pole. While the poles would be co-located, some visual offset is evident here due to the angle of the view. The three new transmission lines appear to be in the same horizontal visual “band” and visually meld with the existing lines – for the most part they do not protrude higher in the view. This is consistent with the visual line, color, texture, and form of the existing transmission line. As noted in the discussion of KOP XX in Section 3.1.1, while this view provides an expansive panoramic view, the visual sensitivity at this KOP is considered moderate as the view is defined by development in neighboring communities. As Segment 2 would be co-located with the existing components and would share the same visual space as the existing transmission line, the visual contrast would be low to moderate.

In summary, for the scenic vistas in Rancho La Costa Preserve and Diamond Trail Preserve, as listed in Table 3.1-3, the Project would not be visible in the view, and no impact on these scenic vistas would occur. For the scenic vistas in Sage Hill Preserve and Escondido Creek Preserve, the apparent change would be minimal because re-energization of Segment 3 would use existing poles and towers, resulting in low visual contrast for a less-than-significant impact. From Simmons Family Park, the visual contrast would be low to moderate. Combined with the moderate visual sensitivity, based on the guidelines identified in Table 3.1-2, the impact on the scenic vista from Simmons Family Park would be less than significant.

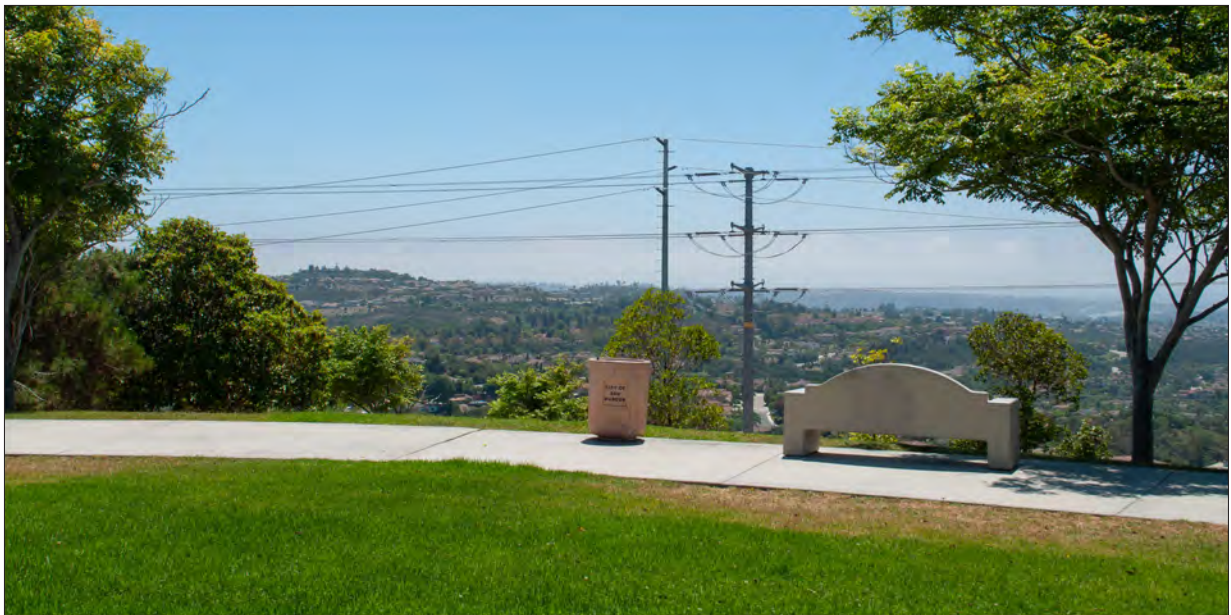
~~Although scenic vistas exist in the vicinity of the Project alignment, as noted above, the Project would not be within the foreground of any designated scenic vistas. Also, the Project components would not create a significant visual contrast or detract from the existing visual character along the Project alignment. Therefore, impacts to scenic vistas resulting from construction, operation, or maintenance of the Project would be less than significant.~~

b) Whether the Project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway: *NO IMPACT*.

The Project would not substantially damage scenic resources within a State Scenic Highway. State Route 78 is designated by the City of San Marcos as a view corridor and eligible as a State Scenic Highway; however, it is located approximately 1.1 miles northeast of the San Marcos substation (City of San Marcos, 2013) and out of view. I-15 is designated as a scenic corridor in the Escondido General Plan, and is located approximately 1 mile to the east of the Project (City of Escondido, 2012) and out of view. Project-related changes would not be noticeable from either a State Scenic Highway or a city-designated scenic corridor; therefore, no impacts would occur.



Existing



Proposed

D:\2018\12.05 - CPUC SDGE TL6975\05 Graphics-GIS-Modeling\Illustrator

SOURCE: SDGE, 2019

TL 6975 San Marcos to Escondido Project



Figure 3.1-16
KOP XX Existing and Proposed Conditions
at Simmons Family Park Picnic Area – Looking Southwest

- c) **Whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings, or since the project is in an urbanized area, whether it would conflict with applicable zoning and other regulations governing scenic quality: *LESS THAN SIGNIFICANT IMPACT.***

Portions of the Project are located in an urbanized area, as defined in CEQA Guidelines Section 15387, and as mapped by the U.S. Census (U.S. Census Bureau, 2010). However, as described in Section 3.1.2, the CPUC does not consider local zoning and other regulations governing scenic quality to be “applicable,” as that term is used in CEQA. This analysis addresses potential conflicts with local general plans and zoning, but in the urbanized jurisdictions that do not have applicable regulations, it also considers whether the Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Construction

Construction-related visual impacts would result from the temporary presence of equipment, materials, and work crews at the San Marcos and Escondido substations, along the alignment, along access roads, and at staging yards and temporary staging areas. SDG&E has identified candidate staging yards with the size and location to accommodate the scope of the Project (see **Table 2-10**, Potential Staging Yards and **Figure 2-10** in Chapter 2, *Project Description*). Construction impacts on visual quality would be limited to the one-year construction period. Impacts along the alignment would be limited as construction work would be conducted in a sequential fashion, with work occurring in multiple locations along the Project alignment to minimize the total construction schedule, which would limit the presence of construction equipment, materials, etc. Staging areas would also be temporarily visually impacted by the presence of large equipment and materials (e.g., equipment wash stations, pole assemblage, materials and equipment storage, storage containers, construction trailers, portable restrooms, etc.); however, all staging areas and other work sites would be restored to their pre-Project condition following construction, as required in the Project Stormwater Pollution and Prevention Plan and SDG&E’s BMP Manual (explained in detail in Section 3.10, *Hydrology and Water Quality*). Project construction would not substantially degrade the existing visual character of the substation sites or alignment, and overall visual sensitivity is expected to be low to moderate due to the short duration of construction activities (i.e., less than one year). Impacts would be less than significant.

There are no local zoning or other regulations related to scenic quality that would pertain to construction.

Operation

San Marcos Substation

At San Marcos Substation, a new 7- by 7-foot circuit breaker pad, SF₆ circuit breakers, seven piers (2 feet in diameter and 6 feet tall), and a 30-foot-tall A-frame would be installed to accommodate the Project. The San Marcos Substation is located in the western portion of the City of San Marcos. The City’s General Plan conceptually defines significant visual resources; however, it does not provide specific goals, policies, or ordinances that provide criteria by which to assess impacts. Although there would be additional equipment at the substation, the overall

visual change would be low, with most changes being screened by the existing fence and landscaping. The 30-foot A-frame would likely be visible from Discovery Street and neighboring residences, but would not change the visual character of the area. Viewer sensitivity in this area is moderate to high, with affected viewers including users of the Lake San Marcos Country Club and residents surrounding the substation; however, the Project would not substantially degrade the existing visual character of the area, and the overall impact would be less than significant due to the low degree of visual change proposed by the Project (see Table 3.1-2).

Segment 1

For Segment 1, along 1.8 miles of the alignment, wooden poles approximately 20 to 84 feet tall would be replaced with dulled galvanized steel poles approximately 43 to 101.5 feet tall.

To determine the level of impact of the Project to existing visual character or quality of the area along the Project alignment, visual simulations were developed at ~~three~~four KOPs based on known Project characteristics. In Figures 3.1-~~14~~17, 3.1-~~15~~18, and 3.1-~~16~~19, and 3.1-20, these simulations have been paired with the existing view at the respective KOP.

The new dulled galvanized steel poles would be in approximately the same location as the existing wooden poles, though offset from 6 to 8 feet. The taller poles (approximately twice as tall as the existing poles) would be visually more apparent, with the poles being more visible in the distance because they would be taller than the surrounding trees. A comparison of the existing view and simulation demonstrates that the taller poles would be more perceptible than the existing poles at a distance due to their increased presence on the horizon. While the new poles would also be larger in diameter than the existing wooden poles, they would be similar in form and diameter would not appear to be significantly larger. The dull, non-reflective finish of the new structures would lessen their visibility when seen against the sky under typical viewing conditions, compared with the darker appearance of the existing poles. In addition, the lines would be higher than the existing lines and outside of some viewers' line of sight at ground level.

Viewer sensitivity in this area is low to moderate, given its developed visual nature. Affected viewers would include motorists, retail workers, shoppers, and recreationalists at San Marcos High School. The motorists, retail workers, and shoppers are transient viewers and would be less sensitive to visual changes. However, the recreationalists at San Marcos High School, and people watching games in the stands, would view the change for longer periods of time. Nonetheless, while they would be perceptible, the new poles and repositioned circuitry would not introduce a new visual element to the surroundings at KOP A. Per Table 3.1-2, the overall impact would be less than significant due to the low to moderate viewer sensitivity and moderate degree of visual change of the Project.

Figure 3.1-~~14~~17, *KOP A Existing and Proposed Conditions at West San Marcos Boulevard & Discovery Street – Looking West*, is a representative view at KOP A of the Project in the City of San Marcos. At KOP A, the taller poles would be more visually apparent due to their increased presence on the horizon. From this view, the new position of the circuitry would be lower on the horizon and would traverse views of the hillside in the background. In addition, the dull, non-

reflective finish of the new structures would create more contrast against the tan backdrop of the surrounding hillside than under existing conditions.

Figure 3.1-1218, KOP B Existing and Proposed Conditions at West San Marcos Boulevard & South Rancho Santa Fe Road – Looking East, also shows the new dulled galvanized steel poles in approximately the same location as the existing wooden poles, though offset from 6- to 8 feet. KOP B is in the city of San Marcos. While the Project components would be perceptible, they would not introduce a new visual element to the surroundings at KOP B. This would result in a low to moderate visual change.

Viewer sensitivity in this area is low to moderate, being dominated by commercial development and the San Marcos High School main building in the middleground, but with the hills in the background. Affected viewers include motorists, retail workers, and shoppers who would be transient viewers and less sensitive to change. Therefore, the overall impact would be less than significant, per Table 3.1-2.

Figure 3.1-1319, KOP C Existing and Proposed Conditions at West San Marcos Boulevard & Acacia Drive Street – Looking East, shows a low-to-moderate visual change due to increased height and diameter of the dulled galvanized steel poles. KOP C is in the City of San Marcos. A comparison of the existing view and simulated view demonstrates that the taller poles would be slightly more perceptible than the existing poles at a distance due to their increased presence on the horizon. However, given the angle of the view (i.e., looking uphill), the existing line is a dominant feature, just as the new line would be. Although the dull, non-reflective finish of the new structures would lessen their visibility when seen against the sky under typical viewing conditions, compared with the darker appearance of the existing poles, at ground-level the new finish of the poles would create more contrast against the darker vegetated backdrop. While the Project components would be perceptible, they would not introduce a new visual element to the surroundings at KOP C. This would result in a low to moderate visual change.

Viewer sensitivity in this area is low to moderate, with views from publicly-accessible areas, including neighborhood streets, being limited. Potential viewers outside of public neighborhood areas would be those who use the SDG&E ROW access road under the power line for recreation. However, as noted above, with the uphill angle of view limiting sight distance, the visually perceptible change would be in the Project materials, rather than the presence or height of the Project. Per Table 3.1-2, the overall impact would be less than significant.

Figure 3.1-20, KOP Y Existing and Proposed Conditions at Palomar Airport Road/West San Marcos Boulevard – Looking East, shows a low-to-moderate visual change due to increased height and diameter of the dulled galvanized steel poles. KOP Y is in the City of Carlsbad looking east into the City of San Marcos. This simulation is presented to illustrate the potential effect to the visual environment at a gateway point into the City of San Marcos. A comparison of the existing view and simulated view demonstrates that the taller poles would be more perceptible than the existing poles. However, given the amount of existing electric transmission infrastructure at this KOP coupled with the fact that the Project in part replaces an existing transmission line along West San Marcos Boulevard, there would be a low to moderate visual change.



Existing



Proposed

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SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-4417
KOP A Existing and Proposed Conditions
at West San Marcos Boulevard & Discovery Street – Looking West



Existing



Proposed

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SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-4218
KOP B Existing and Proposed Conditions
at West San Marcos Boulevard & South Rancho Santa Fe Road – Looking East



Existing



Proposed

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SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-4319
KOP C Existing and Proposed Conditions
at West San Marcos Boulevard & Acacia Drive – Looking East



Existing



Proposed

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SOURCE: SDGE, 2019

TL 6975 San Marcos to Escondido Project



Figure 3.1-20
KOP Y Existing and Proposed Conditions
at Palomar Airport Road/West San Marcos Boulevard – Looking Northeast

Additionally, with the new stronger steel poles, existing wooden support, or guy, poles would be removed. As can be seen in the upper existing view on Figure 3.1-20, there is a wooden pole in the right quarter of the view. In the lower simulated view, the pole has been removed. However, this would not have a substantial change in the area's visual character or quality at this KOP.

As noted in the description of KOP Y in Section 3.1.1, given the presence of existing infrastructure and development on the visual horizon, the visual sensitivity in the area of KOP Y is low to moderate. Coupled with the low to moderate visual contrast or change created by the Project, as shown in the simulation, the overall impact would be less than significant, per Table 3.1-2.

Most of Segment 1 is within the City of San Marcos, and a small portion would be within unincorporated San Diego County. The City of San Marcos's General Plan conceptually defines valued scenic landforms; however, it does not provide specific goals, policies, or ordinances that provide criteria by which to assess impact. Segment 1 would be aboveground, but the portion located within unincorporated San Diego County would not conflict with the provisions of the San Diego General Plan requiring new development to place utilities underground because this segment would not be new development, but would replace an existing transmission line. This segment is not located within a designated scenic area; therefore, San Diego County Zoning Code Scenic Area Regulations are not applicable. There would be no impact with respect to conflict with applicable regulations.

Segment 2

For Segment 2, 2.8 miles of new transmission line would be placed on dulled galvanized steel monopoles adjacent to the existing line, ranging from 61 to 110 feet in height, set approximately 30 feet east of and parallel to the existing power line in the existing SDG&E ROW. Consistent with the analysis of Segment 1, to determine the level of impact of the Project to existing visual character or quality of the area along the Project alignment, visual simulations were developed at ~~two~~ five KOPs based on known Project characteristics. In Figures 3.1-~~44~~ 21 through 3.1-~~45~~ 24, these simulations have been paired with the existing view at the respective KOP.

Figure 3.1-~~44~~21, *KOP D Existing and Proposed Conditions at White Sands Drive & Sea Island Place – Looking Southeast*, shows a low to moderate visual change due to introduction of the Project transmission line. The existing visual character of this segment is already defined by the existing transmission line, street lighting, and water storage tank in the distance. While the addition of the Project would result in increased constructed visual elements, it would not result in strong contrast against the surrounding environment due to the presence of the existing utility facilities. Therefore, a low to moderate visual change would occur. Viewer sensitivity in this area is moderate, with affected viewers including residents and users of Simmons Family Park. Therefore, per Table 3.1-2, the overall impact would be less than significant.

Figure 3.1-22, *KOP W Existing and Proposed Conditions at South Rancho Santa Fe Road – Looking North*, shows a low to moderate visual change due to introduction of the Project transmission line. The existing visual character of this segment is already defined by the existing landscaping, wall, and fencing in the foreground, with residential development and the existing

transmission line (TL 13811/13825) defining the horizon in the middleground. While the addition of the Project would result in increased constructed visual elements, it would not result in strong contrast against the surrounding environment due to the presence of the existing utility facilities. As the Project would be co-located with the existing power line, the new Project poles would be in close visual proximity to the existing poles. Also, the Project's new three-conductor single circuit would be within the same visual "band" in this view and the existing transmission line. This is consistent with the visual line, color, texture, and form of the existing transmission line. Therefore, a low visual change or contrast would occur attributable to the Project. Visual sensitivity in this area is moderate, with affected viewers including residents and motorists on South Rancho Santa Fe Road. Therefore, per Table 3.1-2, the overall impact would be less than significant.

The evaluation of the Project's effect to the visual character and quality of public views and surroundings at KOP XX is discussed under Question a and illustrated in Figure 3.1-16, *KOP XX Existing and Proposed Conditions at Simmons Family Park Picnic Area – Looking West*.

Figure 3.1-23, *KOP Z Existing and Proposed Conditions at Coast Avenue – Looking West*, shows low to moderate visual change due to introduction of the Project transmission line. The existing visual character here is defined by the existing residential development in the foreground and a limit view of the horizon in the background, with the existing transmission line just over the rooflines. While the addition of the Project would result in increased constructed visual elements, it would not result in strong contrast against the surrounding environment due to the presence of the existing utility facilities. As the Project would be co-located with the existing power line, the new Project poles would be in close visual proximity to the existing poles. Also, the Project's new three-conductor single circuit would be within the same visual "band" in this view and the existing transmission line. This is consistent with the visual line, color, texture, and form of the existing transmission line. Therefore, based on the close location of the Project to the KOP, a low to moderate visual change or contrast would occur attributable to the Project poles. Visual sensitivity in this area is moderate, with affected viewers including residents and motorists on South Rancho Santa Fe Road. Therefore, per Table 3.1-2, the overall impact would be less than significant.

Figure 3.1-1524, *KOP E Existing and Proposed Conditions at Brookside Court – Looking Northwest*, shows a moderate change due to introduction of the Project transmission line. Although the visual character of this segment is already influenced by the existing transmission line, the dense development of single-family residences also contributes to the visual quality of this KOP. The residences form a composite roofline in the foreground, which is prominent in the view. The addition of the Project power line would result in an additional linear utility feature on the horizon. Due to its placement on the ridge, these power transmission facilities would become a more dominant feature within the visual setting. In addition, the Project would reduce utility coherence and increase contrast, as the new line appears both shorter and taller than the existing line, depending on the topography. As a result, there would be a moderate visual change. Viewer sensitivity in this area is moderate; therefore, per Table 3.1-2, the overall impact would be less than significant.



Existing



Proposed

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SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-1421
KOP D Existing and Proposed Conditions
at White Sands Drive & Sea Island Place – Looking Southeast



Existing



Proposed

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SOURCE: SDGE, 2019

TL 6975 San Marcos to Escondido Project



Figure 3.1-22
KOP W Existing and Proposed Conditions
at South Rancho Santa Fe Road – Looking North



Existing



Proposed

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SOURCE: SDGE, 2019

TL 6975 San Marcos to Escondido Project

Figure 3.1-23
KOP Z Existing and Proposed Conditions
at Coast Avenue – Looking West





Existing



Proposed

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SOURCE: SDGE, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.1-1524
KOP E Existing and Proposed Conditions
at Brookside Court – Looking Northwest

Segment 2 would be located within the City of San Marcos and unincorporated San Diego County. The City of San Marcos' General Plan conceptually defines valued scenic landforms; however, it does not provide specific goals, policies, or ordinances that provide criteria by which to assess impact. The Project would be located aboveground, and would not be consistent with the San Diego County Zoning Code. The Project would be constructed and routed to minimize detrimental effects on the visual setting of the designated area because it would be placed within an existing transmission line corridor. This segment is not located within a designated scenic area; therefore, San Diego County Zoning Code Scenic Area Regulations are not applicable. The impact related to conflict with applicable regulations would be the same as the physical aesthetic impacts described above, less than significant.

Segment 3

In Segment 3, the Project would be installed primarily on existing steel lattice towers and poles. The height and configuration of the lattice towers and poles would be unchanged. Due to the lack of visual change associated with this segment of the Project, overall change in visual character and overall visual sensitivity to the change would be low and no impact on the existing visual character or quality of public views would occur.

Segment 3 traverses the southern portion of the City of San Marcos, portions of undeveloped San Diego County, and the western portion of the City of Escondido. San Marcos' and Escondido's General Plans conceptually define valued scenic landforms and significant visual resources, respectively. However, neither plan provides specific goals, policies, or ordinances that provide criteria by which to assess impact. Segment 3 would be aboveground, but the portion located within unincorporated San Diego County would not conflict with the provisions of the San Diego General Plan requiring new development to place utilities underground because this segment would not be new development, but would reconductor or re-energize an existing transmission line. Most of this segment is not located within a designated scenic area; however, a portion would traverse the northern part of the Sage Hill Preserve. Therefore, San Diego County Zoning Code Scenic Area Regulations are applicable. Segment 3 would be constructed and routed to minimize detrimental effects on the visual setting of the preserve because it would be placed within an existing transmission line corridor on existing towers and poles. No grading would occur within the Preserve, and no new signs or lighting would be introduced. There would be no impact with respect to conflict with applicable regulations.

Escondido Substation

At the Escondido Substation, the existing overhead conductor, three existing 69 kV circuits, and existing overhead power lines would be relocated; a new circuit breaker pad and circuit breaker would be installed; and the old circuit breaker pad and an oil containment wall would be removed. To accommodate these changes, five existing poles located just south of the substation would be replaced with two pier foundation poles. The changes would not substantially change the visual character of the existing substation, and due to the industrial nature of the surrounding area, overall visual sensitivity to the proposed changes would be low. Therefore, no visual impact would occur.

This substation is located in the western portion of the City of Escondido. The city's General Plan conceptually defines significant visual resources; however, it does not provide specific goals, policies, or ordinances that provide criteria by which to assess impact. There would be no impact relative to applicable regulations.

Maintenance

Maintenance of the Project would occur as needed, would be limited in duration, and would include activities such as repairing conductors, washing or replacing insulators, repairing or replacing other hardware components, replacing poles, tree trimming, brush and weed control, and access road maintenance. Regular operation and maintenance activities of the overhead facilities would be performed from existing access roads, within SDG&E ROW, or within the existing footprint of the substations. Maintenance would be similar to SDG&E activities that currently occur along the alignment. As maintenance would be limited in duration and similar to current maintenance activities, there would not be any degradation to the visual character of the study area and overall visual sensitivity would be low. Therefore, the impact during Project maintenance would be less than significant.

d) Whether the Project would create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area: *LESS THAN SIGNIFICANT IMPACT.*

Construction and Maintenance

Nighttime construction may be required as a result of a condition of an agency permit (e.g., Caltrans encroachment permit) or local traffic control direction from one of the study area jurisdictions (e.g., as required by City of San Marcos Resolution No. 2002-5865). As a result, construction lighting could adversely impact nighttime views in the vicinity of the construction sites. Additionally, some nighttime lighting may be required during emergency situations when SDG&E would need to inspect, maintain, and repair Tie Line 6975 to maintain service continuity. The Project includes 10 temporary construction staging yards that would include temporary security lighting, some of which would be located in developed areas while others would be located in more remote areas. SDG&E has identified candidate staging yards with the size and location to accommodate the scope of the Project (see **Table 2-10**, Potential Staging Yards and **Figure 2-10** in Chapter 2, *Project Description*). Where the staging areas are located in urban areas, there would be other sources of nighttime lighting (e.g., street lights, commercial signage, etc.). Where the staging areas are located in less developed areas, the lighting created by the staging areas would be more noticeable, creating more contrast against the darker surroundings. Due to distance and topography, it is unlikely that the staging areas in more remote areas would adversely affect nighttime views. However, the staging areas south of Escondido would have the highest likelihood for impacts because of lack of topography and how close it is to the new residential development to the west (approximately 500 feet). Project lighting would be directed on-site and shielded downward away from any off-site sensitive receptors and would be removed once the subject work was completed. Overall, visual impacts associated with light and glare would only occur on a temporary basis through the phased sequence of the construction schedule.

Therefore, impacts related to Project lighting during construction and maintenance would be less than significant.

Operation

No new sources of substantial light or glare would be created that would adversely affect daytime or nighttime views in the area during operation of the Project. Any construction or alteration of a structure that may affect the National Airspace System is required to notify and comply with obstruction requirements set forth by the Federal Aviation Administration (FAA, 2007). Any structure (i.e., pole, tower) exceeding 200 feet above ground surface would be required to be equipped with obstruction lighting, which typically would be a flashing red beacon at the top of the structure. However, none of the proposed structures for this Project are over 200 feet above ground surface. No new lighting would be required at either of the substations, and neither the existing nor the proposed transmission line facilities require permanent lighting. New pole structures would use dulled galvanized steel or weathered steel designed to minimize the potential for glare. Potential glare from overhead conductors would be minimized through the use of non-specular conductors. Therefore, impacts regarding new substantial sources of light or glare during Project operation would be less than significant.

3.1.5 References

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Available online at: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua78661_san_diego_ca/DC10UA78661.pdf.

~~U.S. Census Bureau, 2010. 2010 Census Urbanized Area Reference Maps: Accessed March 18, 2019.~~

U.S. Department of Transportation (DOT), 2015. Guidelines for the Visual Impact Assessment of Highway Projects.

Air Quality

Text on Draft IS/MND page 3.3-2 under sub-heading “Ozone” has been added as follows:

Ozone can cause the muscles in the airways to constrict, potentially leading to wheezing and shortness of breath (USEPA, 2019). Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease (USEPA, 2019). Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development, and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children (USEPA, 2019). Inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms, and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath (CARB, 2016a).

People most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers (USEPA, 2019). Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure (USEPA, 2019). Studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults (CARB, 2016a). Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults (CARB, 2016a).

Table 3.3-1 in the Draft IS/MND is revised as follows:

**TABLE 3.3-1
SAN DIEGO AIR BASIN CRITERIA POLLUTANT ATTAINMENT STATUS**

Pollutant	Federal	State
Ozone (O ₃ , 1-hour standard)	--- ¹	Nonattainment
Ozone (O ₃ , 8-hour standard)	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxides (NO ₂)	Attainment	Attainment
Inhalable Particulates (PM ₁₀) (24-hour)	Attainment	Nonattainment
Inhalable Particulates (PM ₁₀) (annual mean)	Unclassifiable ²	Nonattainment
Fine Particulates (PM _{2.5}) (annual mean)	Attainment	Nonattainment
<u>Sulfur Dioxide</u>	<u>Attainment</u>	<u>Attainment</u>
<u>Lead</u>	<u>Attainment</u>	<u>Attainment</u>

¹ The federal 1-hour standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

² At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

SOURCE: SDAPCD, 2018

The following addition has been added to the end of Question b on page 3.3-10 of the Draft IS/MND:

The significance thresholds discussed above were set at emission levels tied to the region's attainment status. They are emission levels at which CEQA projects must use feasible mitigations. They are not intended to be indicative of any localized human health impact that a project may have. Therefore, a project's exceedance of the mass regional emissions threshold (e.g., pounds per day NO_x thresholds) prior to mitigation from construction-related activities does not necessarily indicate that a project would cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels. Furthermore, since the Project would not cause a cumulatively considerable net increase of any of the above-listed pollutants, it would not contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.²

The last paragraph on Draft IS/MND page 3.3-11 is revised as follows:

As disclosed in Table 3.3-4, maximum daily construction emissions would not exceed any of the thresholds of significance. Therefore, exhaust and fugitive dust emissions from

² Even if the Project were to cause a cumulatively considerable net increase of any of the above-listed pollutants, available models today are designed to determine regional, population-wide health impacts. These models cannot accurately or meaningfully quantify ozone-related health impacts caused by NO_x or ROG emissions at a project level because of the complexity of ozone formation and given the state of environmental science modeling in use at this time, which is currently not well-equipped to model regional ozone concentrations resulting from project-level emissions (SCAQMD, 2015a; SJVAPCD, 2015).

Project construction would not result in a violation or contribute to a violation of an air quality standard. The associated impact would be less than significant. Because the ambient air quality standards have been established to protect human health, and emissions that do not exceed the SDAPCD trigger levels and SCAQMD thresholds are assumed not to cause or contribute to violations of these standards, emissions that do not exceed the trigger levels also are considered not to contribute to significant human health impacts.

The following references have been added to Section 3.3.5, References:

CARB, 2016a. Facts About Ozone and Health, Overview of the harmful health effects of ground level ozone. Available online at: <https://ww3.arb.ca.gov/research/aaqs/caaqs/ozone/ozone-fs.pdf>, last revised November 3, 2016.

San Joaquin Valley Air Pollution Control District (SJVAPCD), 2015. Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

SCAQMD, 2015a. Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno.

USEPA, 2019. Health Effects of Ozone Pollution. Available at: <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>. Accessed February 4, 2019.

Biological Resources

The text on page 3.4-2 is revised as follows:

The Project would traverse developed residential neighborhoods, industrial facilities, open space preserves, and commercial and vacant lots. ~~All construction would occur within existing rights of way (ROW), franchise positions (city/county roadways), and SDG&E fee owned property.~~

The bottom of Table 3.4-1 text is revised as follows:

NOTES:

- ^a The SDG&E Subregional NCCP is discussed below in Section 3.4.2, Regulatory Setting, under the subheading "Other Technical Plans"
- ^b Vegetation community communities codes correspond to Oberbauer et al. (2008), which also mirror Holland's (1986) element code. These codes help define the vegetation hierarchy inherent in a classification system. Similarly coded vegetation communities exhibit similar assemblages of plant and animal species, and typically exist in similar macro-habitat types.
- * Indicates a sensitive natural community.

Text on page 3.4-9 is revised as follows:

A total of ~~37~~ 26 special-status wildlife species are known to potentially occur in the BSA (Table 3.4-2). Of these special status wildlife species, five avian species were identified as present during surveys conducted, and 21 have potential to occur within the Project area based on the proximity of historical records and/or the presence of suitable habitat.

The five species below are added to Table 3.4-3 and the Draft IS/MND is revised as follows:

<u>San Diego thorn-mint</u> (<u>Acanthomintha</u> <u>ilicifolia</u>)	<u>Yes</u>	<u>FT, SE,</u> <u>1B.1</u>	<u>Annual herb. Prefers friable or</u> <u>broken clay soils in grassy</u> <u>openings in chaparral and coastal</u> <u>sage scrub, valley and foothill</u> <u>grassland, and vernal pools; 33–</u> <u>3,150 feet (ft). Blooming period:</u> <u>April–June</u>	Suitable friable clay soils are very limited within the survey area. If present on-site this species would have been observed. Low potential.
<u>California adolphia</u> (<u>Adolphia californica</u>)	<u>No</u>	<u>2B.1</u>	<u>Deciduous shrub. Clay soils in</u> <u>chaparral, coastal scrub, and valley</u> <u>and foothill grassland; 147–2,428 ft.</u> <u>Blooming period: December–May</u>	Approximately 87 individuals were detected in the northwestern portion of the survey area. Present.
<u>San Diego sagewort</u> (<u>Artemisia palmeri</u>)	<u>No</u>	<u>4.2</u>	<u>Deciduous shrub. Sandy soils in</u> <u>mesic areas in chaparral, coastal</u> <u>scrub, riparian forest, riparian</u> <u>scrub, riparian woodland; 49–</u> <u>3,002 ft. Blooming period:</u> <u>February– September</u>	Approximately 65 individuals were detected in the eastern portion of the survey area. Present.
<u>Encinitas baccharis</u> (<u>Baccharis vanessae</u>)	<u>Yes</u>	<u>FT, SE,</u> <u>1B.1</u>	<u>Deciduous shrub. Sandstone in</u> <u>maritime chaparral and cismontane</u> <u>woodland; 196– 2362 ft. Blooming</u> <u>period: August - November</u>	Perennial subshrub which would have been detected during rare plant surveys if it were present. Low potential.
<u>San Diego sunflower</u> (<u>Bahiopsis</u> <u>[= Vigueria] laciniata</u>)	<u>No</u>	<u>4.2</u>	<u>Perennial shrub. Coastal sage</u> <u>scrub and chaparral; 295–2,460 ft.</u> <u>Blooming period: February–August.</u>	One individual detected in northwestern portion of PSA. Present.

The text under the subheading “Preserve Areas” on page 3.4-20 in Section 3.4 of the Draft IS/MND is revised as follows:

This includes lands permanently protected as part of regional habitat conservation planning efforts and includes the County-owned Sage Hill Preserve, the Center for Natural Lands Management-managed University Commons, the Rancho Dorado Homeowners Association (HOA) Preserve, Carlsbad Raceway Open Space Preserve, Palomar Forum, San Elijo Hills Open Space, and the Carrillo Ranch Reserve. The Project would be located within SDG&E’s ROW within these conserved lands.

Text under subheading “San Diego County Multiple Habitat Conservation Program” on page 3.4-26 in Section 3.4 of the Draft IS/MND is revised as follows:

Portions of the Project would occur within limits of the following subarea plans:

- City of Carlsbad Subarea Plan, approved in 2004

- City of San Marcos Subarea Plan, still in draft form
- City of Escondido Subarea Plan, ~~approved in 2001~~ still in draft form

Text on page 3.4-30 is revised as follows:

SDG&E intends to utilize mitigation credits authorized under the 2017 HCP ITP to mitigate for impacts on sensitive habitats for the Project. SDG&E also proposes to utilize take coverage or modification of habitat under the 2017 HCP.

The Project would be located within the area where SDG&E's utility operations are governed by the NCCP. SDG&E has indicated that it would seek incidental take coverage for temporary and permanent impacts to natural habitat resulting from construction of the Project through the NCCP, and may rely on the mitigation bank associated with the NCCP to fulfill the mitigation requirements for those impacts (ICF, 2017a). ~~SDG&E proposed to authorize take under the 2017 HCP.~~ For operation and maintenance of the Project, SDG&E would implement the NCCP to comply with the FESA and CESA (SDG&E, 1995; ICF, 2017a).

Text on page 3.4-33 is revised as follows:

As noted in the discussion of the NCCP in Section 3.4.2, *Regulatory Setting*, in approving the NCCP, USFWS and CDFW determined that implementation of avoidance and minimization measures and Operational Protocols would avoid or reduce potential impacts on special-status plant and wildlife species and provide appropriate mitigation where impacts occur. According to the most recent SDG&E Low-Effect Habitat Conservation Plan 2018 Summary Report, SDG&E would have approximately 169 acres of mitigation credit available as of August, 2019 (SDG&E 2019a, SDG&E 2019b). However, in order to ensure sufficient take or mitigation credits provided under the NCCP at the time of Project construction, ~~However, there are currently no assurances that sufficient take or mitigation credits provided under the NCCP would be available at the time Project construction would commence or if additional take authorization would be required by the wildlife agencies. If the take of listed species goes beyond the available take authorized under the NCCP, this additional take and/or adverse modification of habitat could result in a significant impact beyond what is covered under the NCCP. Therefore, in the event that there are not sufficient take or mitigation credits provided under the NCCP at the time of Project construction;~~

Text on page 3.4-34 is revised as follows:

Significance after Mitigation: ~~There is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP at the time of construction to address impacts on federal and State listed sensitive plant species.~~ With implementation of Mitigation Measure BIO-1, compliance with the requirements of the 1995 NCCP and the 2017 HCP, or with equally or more effective conditions imposed by new authorizations, would be

required. Therefore, impacts on the special-status plant species attributable to the Project would be reduced to less than significant.

Text on page 3.4-36 is revised as follows:

As noted in the discussion of the NCCP in Section 3.4.2., *Regulatory Setting*, in approving the NCCP, USFWS and CDFW determined that implementation of avoidance and minimization measures and Operational Protocols would avoid or reduce potential impacts on special-status plant and wildlife species and provide appropriate mitigation where impacts occur. ~~However, there are currently no assurances that sufficient take or mitigation credits provided under the NCCP would be available at the time Project construction would commence. If the take of listed species goes beyond the available take authorized under the NCCP, this additional take and/or adverse modification of habitat could result in a significant impact beyond what is covered under the NCCP. Therefore, in the event that there are not sufficient take or mitigation credits provided under the NCCP at the time of Project construction, Mitigation Measure BIO-1 is proposed to avoid or reduce impacts. Implementation of this mitigation measure would ensure that the Project would comply with all regulatory requirements addressing special-status reptile species, reducing this impact to less than significant.~~

Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts. See full text of this Mitigation Measure under the analysis of *Special-Status Plant Species*, above.

Significance after Mitigation: ~~There is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP at the time of its construction to address impacts on federal and/or State-listed sensitive reptile species. With implementation of Mitigation Measure BIO-1, compliance with the federal and California Endangered Species Acts would be required in the absence of sufficient NCCP credits. Therefore, impacts on the special-status reptile species attributable to the Project would be reduced to less than significant.~~

Text on page 3.4-40 is revised as follows:

Significance after Mitigation: ~~There is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP at the time of its construction to address impacts on federal and/or State-listed sensitive avian species. With implementation of Mitigation Measure BIO-1, compliance with the federal and California Endangered Species Acts would be required in absence of sufficient NCCP credits. Avoidance of impacts resulting from helicopter use is not currently covered within NCCP Section 7.1 Operational Protocols or the APMs proposed for this Project.~~

Text on page 3.4-41 is revised as follows:

As noted in the discussion of the NCCP in Section 3.4.2., *Regulatory Setting*, in approving the NCCP, USFWS, and CDFW determined that implementation of avoidance and

minimization measures and Operational Protocols would avoid or reduce potential impacts to special-status plant and wildlife species and provide appropriate mitigation where impacts occur. However, there are currently no assurances that sufficient take or mitigation credits provided under the NCCP would be available at the time Project construction would commence. ~~If the take of listed species goes beyond the available take authorized under the NCCP, this additional take and/or adverse modification of habitat could result in a significant impact beyond what is covered under the NCCP. Therefore, in the event that there are not sufficient take or mitigation credits provided under the NCCP at the time of Project construction, Mitigation Measure BIO-1 is proposed to avoid and reduce impacts. Implementation of this mitigation measure would ensure that the Project would comply with all regulatory requirements addressing special status mammal species, reducing this impact to less than significant.~~

Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts. See full text of this Mitigation Measure under the analysis of *Special Status Plant Species*, above.

Significance after Mitigation: ~~There is no documented assurance that there would be sufficient mitigation/take credits available to the Project under the current NCCP at the time of its construction to address impacts on federally and/or State-listed sensitive mammal species. With implementation of Mitigation Measure BIO-1, compliance with the federal and California Endangered Species Acts would be required in the absence of sufficient NCCP credits. Therefore, impacts on special status mammal species attributable to the Project would be reduced to less than significant.~~

Mitigation Measure BIO-3: Avoid Jurisdictional Resources mentioned on pages 3.4-37 and 3.4-48 is revised as mentioned above in the Executive Summary.

The following references have been added to Section 3.4.5, References:

SDG&E, 2019a. San Diego Gas and Electric Low-Effect Habitat Conservation Plan, 2018 Summary Report. August 8, 2019.

SDG&E, 2019b. San Diego Gas and Electric Low-Effect Habitat Conservation Plan, Projects Pending Post Construction Reports. August 8, 2019.

Cultural Resources

Text on page 3.5-4 of the Draft IS/MND is revised as follows:

The first European presence near present day San Diego came in 1542, when Juan Rodriguez Cabrillo led an expedition along the coast. Europeans did not return until 1769, when the expedition of Gaspar de Portola traveled overland from San Diego to San Francisco. In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples (Horne and McDougall, 2003). The nearest mission to the Project was Mission San Luis Rey Diego de Aleala, founded in 179869 by Fr. Fermin Lasuen ~~ather Junipero Serra~~.

Table 3.5-1 is revised as follows:

-	-	TL 13811/13825	Historic architectural resource: transmission line	2018	Recommended not eligible	<u>50</u> 30 feet	Newly identified
-	-	TL 13811A	Historic architectural resource	2018	Recommended not eligible	<u>50</u> 30 feet	Newly identified

Text on page 3.5-17 is revised as follows:

TL 13811/13825: This resource is a newly recorded historic architectural resource consisting of a transmission line. TL 13811/13825 is comprised of 20 steel poles ranging from 60 to 70 feet high, most with three pairs of horizontal cross arms. This power line alignment is over 50 years; however, all of the existing TL 13811/13825 poles within the Project alignment are less than 50 years old. The resource is parallel to and within 50~~30~~ feet of Segment 2 of the Project alignment. Due to the age of the poles, TL 13811/13825 has been recommended ineligible for listing CRHR. (Yates et al., 2018)

Table 3.5-2 is also revised as follows:

-	-	TL 13811/13825	Historic architectural resource: transmission line	No	<u>50</u> 30 feet	No	NA
-	-	TL 13811A	Historic architectural resource	No	<u>50</u> 30 feet	No	NA

Mitigation Measure CUL-1: Retention of Qualified Archaeologist on page 3.5-33 in the Draft IS/MND is revised as mentioned above in the Executive Summary.

Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160 on page 3.5-34 in the Draft IS/MND is revised as mentioned above in the Executive Summary.

Greenhouse Gas Emissions

Text on page 3.8-9 in the second paragraph in the sub-heading section “Approach to Analysis” is revised as follows:

The San Diego Air Pollution Control District (SDAPCD) has not formally adopted a CEQA significance threshold for GHG emissions; however, the California Air Pollution Control Officers Association (CAPCOA) County of San Diego recommends ~~has referenced~~ the use of a screening threshold of 900 metric tons CO₂e per year (County of San Diego, 2015)... It has been determined by the CPUC that projects with low annual GHG emission rates below the CAPCOA-County of San Diego ~~County of San Diego~~ screening threshold of 900 metric tons CO₂e per year would not be expected to interfere with the state’s ability to achieve the GHG reduction targets established in Executive Order S-3-05 and B-55-18.

The following paragraph from the revision above on page 3.8-9 is revised as follows:

This GHG significance threshold is intended for long-term operational GHG emissions, but for construction related GHGs, the County (County of San Diego, 2015) has recommendeds that total emissions from construction be amortized over 20 years representing the life of the project and added to operational emissions and then compared to the operation-based significance threshold (County of San Diego, 2015). Similar to the ~~County's recommended~~ approach identified by the County for construction emissions, this analysis amortizes Project construction emissions over a 20-year project lifetime, adds them to the operational emissions, and then compares the combined emissions to the significance threshold of 900 metric tons CO₂e per year.

Under Question b on page 3.8-11 the text is revised as follows:

As discussed in *Approach to Analysis* above, CPUC has determined that Projects with low annual GHG emission rates below the CAPCOA ~~County of San Diego~~ screening threshold of 900 metric tons CO₂e per year would not be expected to interfere with the state's ability achieve the GHG reduction targets established in Executive Order S-3-05 and B-55-18.

Noise

Text on page 3.13-6 is revised as follows:

~~Vehicular traffic noise was~~ Existing ambient noise levels were measured to be as high as 68.7 dBA L_{eq}. Additional sources include distant propeller aircraft, commercial shopping plazas, outdoor uses at several schools, and distant traffic on State Route 78 and Interstate 15.

Text on page 3.13-9 is revised as follows:

Policy N-1.1: Noise Compatibility Guidelines. Use the Noise Compatibility Guidelines (Table N-1) [shown here as **Table 3.13-3**] and the Noise Standards (Table N-2) [shown here as **Table 3.13-34**] as a guide in determining the acceptability of exterior and interior noise for proposed land uses.

Table 3.13-3 is revised as follows:

TABLE 3.13-3
COUNTY OF SAN DIEGO AND CITY OF SAN MARCOS GENERAL PLAN NOISE COMPATIBILITY GUIDELINES

Land Use	Community Noise Exposure - CNEL (dBA)						
	50	55	60	65	70	75	80
A. Residential—single family residences, mobile homes, senior housing, convalescent homes							
B. Residential—multi-family residences, mixed-use (commercial/residential)							
C. Transient lodging—motels, hotels, resorts							
D. Schools, churches, hospitals, nursing homes, child care facilities							
E. Passive recreational parks, nature preserves, contemplative spaces, cemeteries							
F. Active parks, golf courses, athletic fields, outdoor spectator sports, water recreation							
G. Office/professional, government, medical/dental, commercial, retail, laboratories							
H. Industrial, manufacturing, utilities, agriculture, mining, stables, ranching, warehouse, maintenance/repair							

- ☐ ACCEPTABLE—Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal construction, without any special noise insulation requirements.
- ☐ CONDITIONALLY ACCEPTABLE—New construction or development should be undertaken only after a detailed noise analysis is conducted to determine if noise reduction measures are necessary to achieve acceptable levels for land use. Criteria for determining exterior and interior noise levels are listed in Table 3.13-3, Noise Standards. If a project cannot mitigate noise to a level deemed acceptable, the appropriate county decision-maker must determine that mitigation has been provided to the greatest extent practicable or that extraordinary circumstances exist.
- ☒ CONDITIONALLY ACCEPTABLE in City of San Marcos, ACCEPTABLE in San Diego County
- ☐ UNACCEPTABLE—New construction or development shall not be undertaken.

NOTE: Land use descriptions vary slightly, but not substantively, between County of San Diego and City of San Marcos general plans.

SOURCE: County of San Diego, 2011, Table N-1; City of San Marcos, 2012, Table 7-3

Table 3.13-4 is also revised as follows:

TABLE 3.13-4
COUNTY OF SAN DIEGO AND CITY OF SAN MARCOS GENERAL PLAN NOISE STANDARDS

1.	The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
2.	The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
3.	The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA L_{eq} (one-hour average).
4.	For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area: (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet, (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area; (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.
5.	For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
6.	For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
7.	For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
8.	The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
9.	For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" [in County table N-1 or by the City of San Marcos; see IS/MND Table 3.13-3] or an equivalent one-hour noise standard.

SOURCE: County of San Diego, 2011, Table N-2; City of San Marcos, 2012, Table 7-4.

Text on page 3.13-14 is revised as follows:

The City of San Marcos noise ordinance is found in the City's Municipal Code, Chapters 10.24 (Noise) and 20.300.70 (Performance Standards), and contains the following noise standards relevant to this analysis:

Chapter 10.24.020(b)(9): Erection or demolition of buildings, excluding owner resident additions or remodeling, and the grading and excavation of land including the use of blasting, the start-up and use of heavy equipment such as dump trucks and graders and the use of jack hammers except on week days Monday through Friday between the hours of 7:00 a.m. and 6:00 p.m. and on Saturdays 8:00 a.m. to 5:00 p.m. The City Manager may waive any or all of the provisions of this subsection in cases of urgent necessity, or in the interest of public health and safety. The provisions of this subsection may also be waived or modified pursuant to a Conditional Use Permit or

other development entitlement processed and issued in accordance with the applicable City requirements and procedures.

Chapter 20.300.70(EF)(2): No person shall create or allow the creation of exterior noise that causes the noise level to exceed the noise standards established by Table 20.300-4 [shown here as **Table 3.13-8a5**]. Increases in allowable noise levels listed in Table 20.300-4 may be permitted in accordance with the standards outlined in Table 20.300-5 [see-shown here as **Table 3.13-8b8**].

Chapter 20.300.070(F): Increases in allowable noise levels listed in Table 20.300-5 may be permitted in accordance with the standards outlines in Table 20.300-5.

The City of San Marcos Municipal Code Noise limits contained under ~~Chapter Title 17, Article 12-20, Chapter 20.300,~~ are not applicable to activities which are preempted by State law—“shall not be construed to limit or interfere with the installation, maintenance, or operation of water lines; sewer lines; gas lines; other public utility pipelines; or electric, telephone, or telegraph transmission lines when installed, maintained, and operated in accordance with all other applicable laws.” (San Marcos Municipal Code Section 20.100.040(D)10.24.040.

Table 3.13-8 on page 3.13-15 is revised as follows:

TABLE 3.13-8A
CITY OF SAN MARCOS SOUND LEVEL LIMITS-EXTERIOR NOISE STANDARDS BY ZONE

Location	Time	One-Hour Average Sound Level Limits (dBA)	L ₂₅	L _{8.33}	L _{1.67}	L _{max}
Single-Family Residential (A, R-1, R-2) ^{1,2}	7:00 a.m. to 10:00 pm.	60	65	70	75	80
	10:00 p.m. to 7:00 a.m.	50	55	60	65	70
Multi-Family Residential (R-3) ^{1,2}	7:00 a.m. to 10:00 pm.	65	70	75	80	85
	10:00 p.m. to 7:00 a.m.	55	60	65	70	75
Commercial Zones (C, O-P, S-R) ³	7:00 a.m. to 10:00 pm.	60	65	70	75	80
	10:00 p.m. to 7:00 a.m.	55	60	65	70	75
Industrial Zones	7:00 a.m. to 10:00 pm.	65	70	75	80	85
	10:00 p.m. to 7:00 a.m.	60	65	70	75	80

NOTES:

¹ For single-family detached dwelling units, the "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area: (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet, (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area; (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.

² For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.

³ For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.

SOURCE: City of San Marcos Municipal Code, Chapter 20.300.70(EF)(2), Table 20.300-45

TABLE 3.13-8B
CITY OF SAN MARCOS PERMITTED INCREASE IN NOISE LEVELS [EXTERIOR]

Permitted Increase (dBA)	Duration (cumulative minutes per hour)
• <u>5</u>	• <u>15</u>
• <u>10</u>	• <u>5</u>
• <u>15</u>	• <u>1</u>
• <u>20</u>	• <u>Less than 1 minute</u>

SOURCE: City of San Marcos Municipal Code, Chapter 20.300.70(E)(2), Table 20.300-5

San Marcos City Council Resolution 2002-5865 directs the City Manager to require that routine maintenance, repair, and/or installation work in the San Marcos Boulevard public right-of-way, from Knoll Road to the westerly city limits, that necessitates a lane closure in either direction, must occur during nighttime off-peak hours (i.e., 7:00 p.m. to 6:00 a.m.) or on weekends (City of San Marcos, 2002).

The source for Table 3.13-9 is revised as follows:

SOURCE: City of Carlsbad, 2015, Table 5-2

The source for Table 3.13-10 is revised as follows:

SOURCE: City of Carlsbad, 2015, Table 5-3

Text on page 3.13-19 is revised as follows:

As noted in Section 2.5.1, *Construction Schedule and Sequencing*, construction activities would occur during the times established by the local ordinances, with the exception of certain activities where nighttime, weekend, and/or holiday construction activities are necessary, including, but not limited to, construction work timeframes mandated by permit requirements (such as by City of San Marcos Resolution 2002-5865), pouring of foundations (e.g., continuous concrete pour), and pulling of the conductor, which require continuous operation or must be conducted during off-peak hours per agency requirements.

Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan on page 3.13-24 in the Draft IS/MND is revised as mentioned above in the Executive Summary.

Text on page 3.13-27 is revised as follows:

Given the passive nature of the permanent Project components, they would not produce sound in excess of the applied 1-hour average 75 dBA L_{eq}. Maintenance activities would include periodic inspections and repairs conducted on an as-needed, short-term basis and no new maintenance activities are proposed that would produce sound in excess of the applied 1-hour average 75 dBA L_{eq}. The Project's slight increase in maintenance activities and related miles traveled (and resultant traffic noise) would be offset by the decrease in maintenance activities resulting from the proposed pole replacement and reconductoring/re-

energizing of the existing de-energized line, which would result in a net decrease in heavy truck use and mileage. With the exception of unanticipated repairs to reestablish service, these activities and resulting noise would not vary substantially from that currently conducted and experienced along the Project as noted in Section 2.6.1, *General Practice Operation and Maintenance Activities and Practice*. Similarly, given the passive nature of the permanent Project components, long-term operational noise would be approximately the same as under existing conditions and would not result in a substantial permanent increase in excess of standards described in Section 3.13.2. Therefore, this would be a less-than-significant impact.

Table 3.13-14 is revised as follows:

TABLE 3.13-14
VIBRATION SOURCE LEVELS FROM CONSTRUCTION EQUIPMENT

Distance (feet)	Peak Particle Velocity (in/sec)
	Drill Rig, Large Bulldozer
<u>25</u>	<u>0.089</u>
50	0.031
75	0.017
100	0.011
150	0.006

SOURCE: FTA, 2006

Text on page 3.13-28 is revised as follows:

The vibration levels presented in Table 3.13-15~~3~~ represent the worst case vibrations that could be experienced at the nearest sensitive receptor.

The following reference has been added to Section 3.13.5, References:

City of San Marcos, 2002. Resolution No. 2002-5865. May 14.

Recreation

Text on Page 3.16-2 is revised as follows:

~~Rancho La Costa Preserve is comprised of 1,035 acres of non-contiguous protected areas in Carlsbad and San Marcos. The southern section of Segment 2 would cross through this preserve, Escondido Creek and Sage Hill Preserves are also part of the protected lands of the County's MSCP, however, these preserves does not include recreational lands open to the public (County of San Diego SanGIS, 2014). Overhead work, reconductoring, and access roads in Segment 3 would cross through the northern portion of this Sage Hill Preserve and overhead work would occur within 0.5 miles of a northern portion of the Escondido Creek Preserve.~~

Text removed on Page 3.16-2 above has been moved to Page 3.16-3 at the end of the last paragraph in the subheading “City Parks”

Rancho La Costa Preserve is comprised of 1,035 acres of non-contiguous protected areas in Carlsbad and San Marcos. The southern section of Segment 2 would cross through this preserve.

Table 3.16-1 and text on Page 3.16-3 is revised as follows:

**TABLE 3.16-1
PARKS, PRESERVES, AND RECREATIONAL TRAILS IN THE STUDY AREA**

Park, <u>Preserve</u>, or Trail	Location	Nearest Project Component	Ownership
<u>Escondido Creek Preserve</u>	<u>Wild Willow Hollow Road, Southern border of San Marcos, unincorporated San Diego County</u>	<u>Segment 3</u>	<u>County of San Diego</u>
<u>Sage Hill Preserve</u>	<u>North of Elfin Forest Road, Southern border of San Marcos, unincorporated San Diego County</u>	<u>Segment 3</u>	<u>County of San Diego</u>
<u>Rancho Carrillo Trail</u>	<u>Leo Carrillo Ranch Historic Park to San Marcos</u>	<u>Segment 2</u>	<u>City of Carlsbad</u>

~~With one exception noted below, any~~ The majority of recreational trails within the study area potentially affected by the Project are located within the City of San Marcos. There are no such facilities in the cities of Escondido, ~~Carlsbad~~, or Vista.

Text on Page 3.16-4 is revised as follows:

Near Segment 2, Rancho Carrillo Trail is a partially paved trail connecting Leo Carrillo Ranch Historic Park in the city of Carlsbad to the trails network (across Melrose Drive) in the city of San Marcos (City of Carlsbad, 2019). Rancho Dorado is a wide, soft surface trail which provides a route connecting the habitat corridor off of West Sands Drive to Simmons Family Park in San Marcos (City of San Marcos, 2007). Old Creek Ranch/Canyon Trail connects southeast Carlsbad to the City of San Marcos’ San Elijo Park, located on San Elijo Road. San Elijo Trail is a combination of urban (paved surfaces), and soft surfaces also along San Elijo Road. Elfin Forest Trail is a soft surface trail extending along Elfin Forest Road to the unincorporated county lands south of Segment 2. Questhaven Trail is a soft surface trail extending from San Elijo Road to Questhaven Park and south beyond the San Marcos city limits into unincorporated San Diego County.

Text on Page 3.16-8 is added as follows:

The Construction Noise-and-Blasting, and Vibration Reduction plans required in Mitigation Measures NOI-1 and NOI-2, respectively, contain numerous provisions for direct noise and vibration reduction measures. Requirements for exhaust mufflers on construction equipment, noise barriers such as noise shields, barriers, blankets, or enclosures to be used, where feasible, adjacent to or around noisy construction equipment

are included to reduce direct impacts. As described in Mitigation Measure NOI-1, the noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source. In addition to the requirements for direct noise reduction in Mitigation Measure NOI-1, provisions for public notice and correction for exceedances are also required. These provisions include a publicly identifiable hotline (telephone number) posted at affected trailheads and in locations of sensitive receptors, that can be utilized to report noise-related disturbances to the community, along with measures requiring logging of complaints and other feedback and requirements for the implementation of corrective measures for noise and vibration exceedances.

The following reference has been added to Section 3.16.5, References:

City of Carlsbad, 2019. Department of Parks and Recreation website. Available online at: <http://www.carlsbadca.gov/services/depts/parks/open/trails/carrillo.asp>.

Transportation and Traffic

Text on Page 3.17-1 is revised as follows:

The Governor's Office of Planning and Research (OPR) has proposed, and the California Natural Resources Agency has adopted, revisions to CEQA Guidelines Appendix G that ask whether a land use project would "conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)" (Natural Resources Agency, 2018). New Section 15064.3(b)(1) in turns ask whether the project would exceed applicable vehicle miles traveled (VMT) thresholds. However, statewide application of that new section is not required until ~~January~~ July 1, 2020 (~~OPR, 2017~~). Further, none of the study area jurisdictions have adopted VMT thresholds at this time. Therefore, this IS/MND uses the checklist questions set forth in the previously adopted version of CEQA Guidelines Appendix G for the analysis of transportation and traffic impacts.

The following text under the three bullet points describing each study area for each section on Page 3.17-2 has been added below:

The study area also includes the San Marcos and Escondido Substations and the proposed staging areas.

The following text is added under the "City of San Marcos" subheading on Page 3.17-10:

San Marcos City Council Resolution 2002-5865 directs the City Manager to require that routine maintenance, repair, and/or installation work in the San Marcos Boulevard public right-of-way, from Knoll Road to the westerly city limits, that necessitates a lane closure in either direction, must occur during nighttime off-peak hours (i.e., 7:00 pm to 6:00 a.m.) or on weekends (City of San Marcos, 2002).

Text on Page 3.17-16 is revised as follows:

As noted previously, construction of the Project would potentially increase vehicle traffic temporarily and would potentially result in temporary lane closures during construction activities. Construction within public roadways would be conducted pursuant to ~~Caltrans' MUTCD requirements~~ APMs, including approved traffic control plans (APM TRA-1) and would be coordinated with emergency response agencies (APM TRA-2) to ensure that emergency vehicle access is preserved during construction activities. Therefore, construction of the Project would result in a less-than-significant impact on emergency access.

The following reference has been added to Section 3.17.5, References:

City of San Marcos, 2002. Resolution No. 2002-5865. May 14.

Wildfire

Text on Draft IS/MND pages 3.20-8 and 3.20-9, under Section 3.20.2 Regulatory Setting, has been added as follows:

Senate Bill 901

Senate Bill 901 (2018) included a number of provisions related to wildfire risk and management in California including, but not limited to the following: budget adjustments related to emergency response and readiness, the creation of a CALFIRE Wildfire Resilience Program, changes to the requirements of the Forest Practice Act, and increasing the maximum penalties which can be issued by the CPUC to a public utility that fails to comply with CPUC requirements. Additionally, the legislation requires that utilities prepare wildfire mitigation plans that include elements specified in the bill such as the following: (1) a description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks; (2) protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure; and (3) particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electrical corporation's service territory. These wildfire mitigation plans are required to be reviewed by an independent evaluator.

SDG&E Wildfire Safety Plan

SDG&E's Wildfire Mitigation Plan (WMP) approved by the CPUC on May 30, 2019 was created pursuant to SB 901. The WMP builds on the existing FPP and includes some measures that were previously not included in the FPP. The WMP was established with the goal of minimizing the probability that the various components of SDG&E's electric system become the original or contributing source of ignition of a wildfire. The WMP details SDG&E's existing programs and approach to mitigate wildfire risk such as risk

management planning (i.e. the Risk Assessment Mitigation Phase (RAMP) Risk Informed Wildfire Mitigation Plan), operational and engineering practices (i.e., Recloser Protocols, Operating Conditions, Work Procedures, Fire Coordination, Inspection Plans, System Hardening Plans, Vegetation Management Plans, Situational Awareness Protocols, Climate Change Adaptation, and Public Safety Power Shutoff Protocols), emergency preparedness and response plans and procedures. The WMP outlines procedures and requirements that are specific to the High Fire Threat District (HFTD). The WMP also includes performance metrics and monitoring requirements which are relevant to the implementation of the plan. The WMP also describes multiple new wildfire mitigation strategies that SDG&E intends to deploy in the 2019-2020 planning period, such as:

1. Implement a comprehensive fuels management program with the goal of protecting communities and electric facilities;
2. Accelerate its Fire Risk Mitigation (FiRM) and Pole Risk Mitigation and Engineering (PRiME) programs to increase the overall hardening of the electric system;
3. Initiate the Wire Safety Enhancement (WiSE) program to mitigate risk by hardening electric distribution overhead infrastructure and protection systems in wildland urban interfaces;
4. Re-examine and expand the current vegetation management database to improve patrols and pruning requirements; and
5. Enhance vegetation management program by increased inspections, patrols, and trimming (SDG&E, 2019).

Text on Page 3.20-14 is revised as follows:

Although there would be sufficient separation (~~30~~ 50 feet) between the existing 138 kV Tie Line 13811/13825 and the Segment 2 New Build to prevent the two lines from crossing and creating an arc, due to the addition of the Segment 2 line, operation of the Project could result in a minor increase in the risk of wildland fires in the area.

Text at the bottom of Page 3.20-14 is revised as follows:

SDG&E's Fire Prevention Plan and Wildfire Mitigation Plan ~~is~~ described in Section 3.20.2. The overall inspection, maintenance, risk management, emergency suppression, and response programs outlined in ~~the Fire Prevention Plan~~ these plans would apply to the Project and would be incorporated into operation and maintenance protocols as required by CPUC General Orders 95, 165, and 166, CPUC Decision 12-01-032, and California Public Utilities Code Section 702.

Text on Page 3.20-15 is revised as follows:

The Project would consist primarily of reenergizing and rebuilding existing power lines. A portion of the Project would involve constructing a new power line parallel to an existing power line. Therefore, once operational, the Project would not significantly increase exposure to wildfire risk for surrounding communities. However, given the new build of

Segment 2 and the inherent potential for ignition risk associated with power lines, SDG&E's Operation and Maintenance Fire Prevention Plan, Wildfire Mitigation Plan, and Standard Practices would be incorporated into the Project's daily operation, as required by CPUC GO 166. These practices would ensure that potential sources of ignition are minimized during maintenance activities and would deploy precautionary measures during extreme operating conditions. The implementation of these measures would reduce the risk of exposing surrounding communities to exacerbated risk of the uncontrolled spread of a wildfire and associated impacts to a less-than-significant level.

Text on Page 3.20-16 is revised as follows:

As discussed in Question b, above, the incorporation of SDG&E's Fire Prevention Plan, Wildfire Mitigation Plan, Electric Standard Practice 113.1, and compliance with other vegetation clearance and maintenance requirements during operation would ensure that the Project would not substantially increase the risk of wildfire. Because the Project would have a low potential to exacerbate wildfire risk, it also would not pose a substantial risk of causing post-fire slope instability in the study area. Therefore, the potential for Project operation to exacerbate the risk of flooding and mudslides as a result of post-fire slope instability would be less than significant.

The following reference has been added to Section 3.20.5, References:

SDG&E, 2019. Wildfire Mitigation Plan. February 6, 2019. Available online: <https://www.cpuc.ca.gov/SB901/>.

Mandatory Findings of Significance

Text on page 3.21-2 is revised as follows:

CEQA Guidelines Section ~~45130~~-15064(h) requires a discussion of the cumulative impacts of a project...

Text on page 3.21-10 is revised as follows:

For example, although there are no officially-designated scenic vistas in the study area, scenic views are available from informal recreation areas in Rancho La Costa Preserve, Diamond Trail Preserve, Simmons Family Park picnic area, Sage Hill Preserve, and Escondido Creek Preserve. The area's visual character is depicted in Figures 3.1-2 through 3.1-105, which present ~~nine~~ 14 photographs showing existing representative visual conditions and views from publicly-accessible points within the Project area. Following the public review period, addition KOPs and visual simulations were analyzed, as shown by KOPs Y, W, XX, and Z in the revised Aesthetics Section in Chapter 3, *Revisions to the IS/MND*.

Additional text on page 3.21-10 is provided as follows:

In each Project segment, there are existing utility transmission structures (i.e., poles, towers) which are elements of the existing visual character of the study area and the

baseline environmental conditions for evaluation of the Project. In the case of Segment 1, the existing poles would be replaced with new, taller steel poles; therefore, the Project would replace and not combine visually with the existing high-voltage power line. Segment 2 would involve the installation of the new 69 kV transmission line parallel to the existing TL 13811/13825 138 kV transmission line, which in 2010 underwent wood to steel conversion to replace the H-frame wood pole structures previously supporting the 138 kV line. TL 6975 would be designed such that the poles would be co-located with the existing TL 13811/13825 poles to maintain similar spacing and minimize visual discontinuity within the landscape. The Project in Segment 3 would only replace existing poles at the transition point with Segment 2 and at the Escondido Substation. Otherwise, TL 6975 would utilize the existing steel lattice towers and poles, which would not change the appearance of the existing infrastructure here. Therefore, only Segment 2 would have the potential to contribute additional poles, towers, and conductors to the viewshed that would combine with existing power line infrastructure.

The same impact methodology applied to the Project-specific evaluation of direct and indirect impacts, which has been adapted from the approach to visual impact assessment developed by the Federal Highway Administration (DOT, 2015), is also applied to this cumulative impact analysis. This cumulative analysis considers the TL 6975 project together with other closely related past, present, and reasonably foreseeable probable future projects. Of cumulative projects identified in Table 3.21-1, the existing TL 13811/13825 138 kV transmission line noted above would fit this definition. As noted in the aesthetics impact analysis found in Section 3.1.4, while the visual sensitivity along Segment 2 would be moderate, the Project – with TL 13811/13825 as part of the baseline condition – would create a low-to-moderate or moderate visual change to the existing visual environment. For this cumulative impact evaluation, it would be a very similar scenario, as TL 13811/13825 is the only closely related project to be considered with the Project. Both projects would be co-located in a long-established power utility right-of-way. The presence of utility infrastructure would not be an uncharacteristic visual component in viewscapes which include the right-of-way. Both lines would have consistent line, form, color, and texture. Therefore, when considered together, the overall visual contrast and change attributable to past, present, and future projects in the right-of-way would be low to moderate. While the changes attributable to the Project would be visually apparent (i.e., new, taller steel poles), particularly in Segments 1 and 2, the visual characteristics of the incremental effect of the new structures to visual character or quality in the Project area would not be significant viewed in connection with the impacts of other projects. (Less than Significant/Cumulatively Considerable Impact)

Text on page 3.21-13 is revised as follows:

With respect to special-status plants, including those in federally- and State-protected wetlands, impacts would be avoided or minimized with the implementation of APMs BIO-1 through BIO-5 and Mitigation Measures BIO-1 and BIO-3, which includes implementation of NCCP Operational Protocols and habitat reclamation procedures approved by USFWS and CDFW to address cumulative, system-wide impacts on covered

biological resources from SDG&E transmission system construction projects and maintenance activities. As noted in the discussion of Permitting Agreements in Section 3.4.2, *Regulatory Setting*, in approving the SDG&E Subregional NCCP, these agencies determined that its implementation would avoid potential impacts and provide appropriate mitigation for impacts that could not be avoided such that the incremental contribution of covered projects to impacts on covered biological resources is reduced to a level that is less than cumulatively considerable, on a resource-specific basis.

Text on page 3.21-14 is revised as follows:

In this context, given the Project's adherence to the Subregional NCCP requirements, the Project's incremental less-than-significant impact would not cause or have a cumulatively considerable contribution to any significant cumulative effect relating to special-status plant species. (Less than Significant Impact)

As noted in the preceding paragraph, in approving the NCCP, USFWS, and CDFW determined that it provides appropriate avoidance and minimization measures to reduce the incremental contribution of covered projects to a level that is less than cumulatively considerable. The combined temporary and permanent impact of 2.2 acres of habitat within the BSA and larger area encompassed in this cumulative analysis constitutes less than 1 percent. In this context, given the Project's adherence to the Subregional NCCP requirements, the Project's incremental ~~less-than-significant~~ impact would not cause or have a cumulatively considerable contribution to any significant cumulative effect relating to special-status reptile and mammal species. (Less than Significant Impact)

In this context, given the Project's adherence to the Subregional NCCP requirements, the Project's incremental less-than-significant impact would not cause or have a cumulatively considerable contribution to any significant cumulative effect relating to nesting birds and special-status avian species. (Less than Significant Impact)

Like this Project, the cumulative projects considered in this analysis are required to comply with federal and State regulations protecting special-status plant and animal species in a cumulative context through implementation of mitigation measures during construction and/or participation in the local habitat conservation plans currently in force. The approval and implementation of these projects consistent with the San Diego County Multiple Habitat Conservation Program and the Draft North County Multiple Species Conservation Program – which are inherently cumulative in nature and protective of resources on a cumulative basis – in the areas where these plans govern would avoid a significant cumulative impact on special-status plants and animals to which the Project could contribute.

Table 3.21-1, Cumulative Scenario is updated and revised as follows:

**TABLE 3.21-1
CUMULATIVE SCENARIO**

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 1							
1-1	Chandler's Sand and Gravel	Pipeline Drive and Engineer Street	1.3 miles from Segments 1 and 2	City of Vista	4.5 acre materials recovery facility for sand, gravel, and asphalt.	Application submitted July, 2018	Withdrawn
1-2	Keystone Victory Industrial Park	Western terminus of Keystone way	0.35 mile from Segments 1 and 2	City of Vista	Two industrial buildings on 10.3 acres.	Under construction	Summer 2019
1-3	Vista Palomar	2100 West San Marcos Boulevard	Along Segment 1	City of Vista	198 condos, 100-room hotel on 17.2 acres east of Business Park Drive	Under construction	Spring 2019
1-4	San Marcos High School Traffic Improvements	East of intersection of San Marcos Boulevard and South Rancho Santa Fe Road.	Adjacent to Segment 1	City of San Marcos	Pedestrian safety improvements at the intersection at San Marcos Boulevard and South Rancho Santa Fe Road.	2015	2016
1-5	San Marcos Boulevard at Discovery Street Intersection Improvements	Intersection of San Marcos Boulevard and Discovery Street	Adjacent to proposed poles Segment 1	City of San Marcos	Eliminate free right turn at Discovery Street, replace existing traffic signal, and reconfigure intersection	Funded through 2018	Pending
1-6	Starstone/La Rosa Road Drainage Improvements	Starstone Drive to La Rosa Drive and Rancho Santa Fe Road to Linda Vista Drive.	0.75 mile from Segment 1	City of San Marcos	Construct 48-inch concrete storm drain system from Starstone to La Rosa and Rancho Santa Fe Road to Linda Vista Drive intersection.	2015	2016
1-7	Shane Park Plaza	200 Rancho Santa Fe Road	0.9 mile from Segment 1	City of San Marcos	Mixed-use project, 19 apartments and approximately 6,000 square feet retail space.	Unknown	2016
1-8	Pacifica San Marcos	South Rancho Santa Fe Road and Creek Street, between Pawnee Street and South Rancho Santa Fe Road	1 mile north of San Marcos Substation	City of San Marcos	Three-story, mixed-use development with approximately 5,000 4,375 square feet commercial/retail space on the ground floor and approximately 31 residential units on the upper floors.	Approved	Summer 2019
1-9	Bradley Park Channel Improvements	Bradley Park, 1587 Linda Vista Drive	0.36 mile from Segment 1	City of San Marcos	Channel rehabilitation and drainage improvements, water quality protection and erosion control between the upper and lower mesas of the park.	2016	2017
1-10	The MacDonald Group	1100 West San Marcos Boulevard	0.50 mile from Segment 1	City of San Marcos	82 units with up to approximately 5,000 square feet of commercial ground level.	Approved	Tentative 2019
1-11	Main Square (San Marcos Creek Specific Plan)	San Marcos Creek District, 1167 West San Marcos Boulevard	0.4 mile from Segment 1	City of San Marcos	Proposed mixed-use development with 42,305 44,007 square feet of commercial space, 649 468 apartments, 22 live/work units, and 820 surface and underground parking space on 4.5 acres.	2015	Under review 2019

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 1 (cont.)							
1-12	Venturepoint Development	1020 West San Marcos Boulevard	0.5 mile from Segment 1	City of San Marcos	Modify/reconfigure the parking lot, driveway locations and onsite improvements. Offsite improvements to West San Marcos Boulevard.	2011	Under review
1-13	San Marcos Creek Specific Plan, Bent Avenue Bridge and Street Improvements	Between intersections of Discovery Street with Via Vera Cruz and South Bent Avenue.	0.65 mile from Segment 1	City of San Marcos	New 4-lane bridge spanning San Marcos Creek on Via Vera Cruz, a 2-lane bridge on Bent Avenue, widening of Discovery Street to 4-lane secondary arterial standards between the bridges, a portion of the Creekside Promenade Park and habitat and flood protection improvements. Also, relocate the historic "Pink House."	2021	2017
1-14	Channel Widening South of Grand Avenue	South of Grand Avenue and west of Linda Vista Drive	1 mile from Segment 1	City of San Marcos	Widening of the existing drainage channel south of Grand Avenue, west of Linda Vista Drive, creation of riparian habitat and grading of city lots. Construction of a precast bridge over the widened channel for future access to Linda Vista Drive and Grand Avenue.	2015	2016
1-15	East Gate	16 Creekside Drive, northwest corner of Grand Avenue and Creekside Drive.	1.15 miles from Segment 1	City of San Marcos	42-unit affordable housing complex with 11,600 square feet of commercial space on a 2.85-acre lot.	2015	Under review
1-16	The Promenade @ Creekside	2 Creekside Drive, south side of Creekside Drive between Bent Avenue and Grand Avenue	1.3 miles from Segment 1	City of San Marcos	Phase 1 complete. Phase 2 will be the construction of a two-story and three-story 43 affordable housing units and more than 11,000 square feet of retail/commercial space in two phases.	2015	Phase 2 to begin 2018
1-17	H.G. Fenton North (Discovery Village North)	Discovery Street <u>and Craven Road</u>	1.15 miles from Segment 1	City of San Marcos	Within the University District Specific Plan, on the north side of the future Discovery Street, proposing a Tentative Subdivision Map to allow mixed use development consistent with the approved specific plan (residential and office uses).	2016	Approved 2018
1-18	H.G. Fenton South (Discovery Village South)	Future Discovery Street	1 mile from Segment 1	City of San Marcos	Development of 250 220 single-family residential homes on approximately 38 acres.	2016	Approved 2018 <u>2021</u>
1-19	North City (University District Specific Plan) <u>University District Block K</u>	200 East Barham Drive, connecting SR-78 on both sides of Twin Oaks Valley Road to San Marcos Boulevard at Discovery Street.	2.25 miles west of San Marcos Substation	City of San Marcos	2,600 mixed use residential units, 800 student housing units, hotel use (up to 450 rooms), 652,000 square feet of general office, 300,000 square feet of medical office, 700,000 square feet of mixed use retail/commercial, and 30,000 square feet of civic/community use. <u>Block K includes 68 dwelling units.</u>	Under construction	Summer 2019

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 1 (cont.)							
<u>1-20</u>	<u>Kaiser Permanente Master Plan</u>	<u>Craven Road</u>		<u>City of San Marcos</u>	<u>70,7000 SF of Medical Office/Hospital</u>	<u>unknown</u>	<u>unknown</u>
<u>1-21</u>	<u>Jump Ball LLC</u>	<u>W. San Marcos Blvd. and Bent Ave.</u>	<u>1.1 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>3,233 SF Drive-thru Restaurant</u>	<u>Planning Application being processed 2020</u>	<u>unknown</u>
<u>1-22</u>	<u>Bodhi Hill Buddhist Center</u>	<u>Poinsettia Avenue s/o Linda Vista Drive</u>	<u>0.4 mile from Segment 1</u>	<u>City of San Marcos</u>	<u>36,501 Fellowship Hall and 7,612 Monk Dormitory</u>	<u>2023</u>	
<u>1-23</u>	<u>Mariposa II – Affirmedv Housing</u>					<u>Unknown</u>	<u>Unknown</u>
<u>1-24</u>	<u>El Dorado II, LP</u>	<u>West side of Pleasant Way, between Mission Road and Richmar Avenue</u>		<u>City of San Marcos</u>	<u>72 du; 2000 sf</u>	<u>unknown</u>	<u>unknown</u>
<u>1-25</u>	<u>Villa Serena</u>	<u>339 Marcos Street</u>		<u>City of San Marcos</u>	<u>Villa Serena is a three-story affordable apartment complex that would provide 148 units, a community center including a parking structure and underground parking</u>	<u>Unknown</u>	<u>Unknown</u>
<u>1-26</u>	<u>Mercy Hill and Marian Center</u>	<u>Borden Road</u>		<u>City of San Marcos</u>	<u>22,830 SF Christian spiritual center</u>	<u>unknown</u>	<u>unknown</u>
<u>1-27</u>	<u>San Marcos Highlands</u>	<u>North end of N. Los Posas Road</u>		<u>City of San Marcos</u>	<u>189-unit single-family residential</u>	<u>2023</u>	<u>unknown</u>
<u>1-28</u>	<u>Karl Strauss Brewery & Tasting Room</u>	<u>Las Posas Road and Los Vallecitos Boulevard</u>		<u>City of San Marcos</u>	<u>6,132 SF tasting room and commercial kitchen; 2,916 SF entertainment room; and 1,480 SF building for cabana, restrooms, outdoor area, and parking.</u>	<u>2020</u>	<u>unknown</u>
<u>1-29</u>	<u>Corner @ 2 Oaks</u>	<u>SW corner of San Marcos Blvd and N. Twin Oaks Valley Road</u>		<u>City of San Marcos</u>	<u>13,499 office/retail space; 118-unit condominium complex</u>	<u>2019-2020</u>	<u>unknown</u>
<u>1-30</u>	<u>Mariposa</u>	<u>604 Richmar Avenue</u>		<u>City of San Marcos</u>	<u>Apartments; 60 dwelling units</u>	<u>2019</u>	<u>Unknown</u>
<u>1-31</u>	<u>Murai-Sab</u>	<u>N. Las Posas Road</u>		<u>City of San Marcos</u>	<u>Single-family residential; 89 units</u>	<u>2021</u>	<u>Unknown</u>
<u>1-32</u>	<u>The Marc (Dahvia Village)</u>	<u>1045 Armorlite Drive</u>		<u>City of San Marcos</u>	<u>Multi-family residential 416 dwelling units; 15,000 SF commercial retail; and 1.37-acre park</u>	<u>2019</u>	<u>Unknown</u>

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 1 (cont.)							
<u>1-33</u>	<u>C3 Church</u>	<u>1760 Descanso Avenue</u>	<u>1.25 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>Assembly use – 825 seats; 76,938 SF</u>	<u>2019</u>	<u>Unknown</u>
<u>1-34</u>	<u>West Health Pace</u>	<u>1706 Descanso Avenue</u>	<u>1.25 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>20,156 SF senior center</u>	<u>2019</u>	<u>Unknown</u>
<u>1-35</u>	<u>Fitzpatrick</u>	<u>Fitzpatrick Road</u>	<u>2.1 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>Apartments, 78 dwelling units; single-family residential, 2 dwelling units.</u>	<u>2019</u>	<u>Unknown</u>
<u>1-36</u>	<u>Windy Pointe Phase II</u>	<u>Windy Pointe Drive</u>	<u>2.4 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>15,000 SF office space; 18,600 SF multi-tenant industrial</u>	<u>2021</u>	<u>Unknown</u>
<u>I-37</u>	<u>Pacific Commercial</u>	<u>NE Corner of Grand Ave & Pacific St.</u>	<u>0.9 mile from Segment 1</u>	<u>City of San Marcos</u>	<u>29,236 square feet; commercial center</u>	<u>2019</u>	<u>Unknown</u>
<u>I-38</u>	<u>Meadowlark Canyon LLC</u>	<u>San Marcos Blvd</u>	<u>2.0 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>Single Family Residential, 33 dwelling units</u>	<u>Unknown</u>	<u>Unknown</u>
<u>I-39</u>	<u>CIP 88179</u>	<u>Similax Road/South Santa Fe Avenue Intersection</u>	<u>2.0 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>Intersection re-alignment</u>	<u>2020</u>	<u>Unknown</u>
<u>I-40</u>	<u>CIP 86002</u>	<u>San Marcos Boulevard at Discovery Street Intersection</u>	<u>Less than 100 feet from Segment 1</u>	<u>City of San Marcos</u>	<u>Intersection improvements 300' west, and 920' east, of intersection; 1220 lineal</u>	<u>2020</u>	<u>unknown</u>
<u>I-41</u>	<u>PARK CIP</u>	<u>Rancho Tesoro Park</u>	<u>1.8 miles from Segment 1</u>	<u>City of San Marcos</u>	<u>2 acres of 41 acre park improvements; Phase 2 Multi-Use Field and Parking Lot Improvements</u>	<u>2021</u>	<u>unknown</u>
Segment 2							
2-1	Hunter Industries, Inc.	Opal Street	0.15 mile from Segment 2	City of San Marcos	67,657 square foot, 2-story light industrial/office building	Under Review	TBD
2-2	San Elijo Hills San Elijo Hills Town Center	1084 San Elijo Road Elfin forest Road	0.25-0.50 mile from Segments 2 and 3	City of San Marcos	Maximum of 3,466 total homes in community, 450 100 left to be built. San Elijo Hills Town Center consists of 23,000 square feet of retail space and 12 residential townhomes, currently under construction. Final Phase consists of 2 commercial buildings with a combined 44,972 11,711 square feet and 12 residential townhomes.	2016	2018 2019 - 2020
2-3	Questhaven-SAB, LLC	San Elijo Road near former landfill	0.25 mile from Segments 2 and 3	San Diego County	351 condominium units, commercial buildings, and 14 vacant lots.	Proposal submitted 2012	Unknown

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 2 (cont.)							
2-4	Copper Hills Specific Plan	San Elijo Road	0.25 mile from Segments 2 and 3	City of San Marcos	189 residential apartments, 120 attached condominiums, 42 detached condominiums, and 438,749 139,000 square feet of commercial/light industrial buildings on 49 acres; 20 acres of biological open space.	Under Review	TBD
2-5	<u>Tie Line (TL) 13811/13825 (Shadowridge Transmission Enhancement Project)</u>	<u>Spans Vista, Carlsbad, San Marcos, unincorporated San Diego County</u>	<u>Within existing SDG&E right-of-way (ROW), 50 feet west of Project</u>	<u>Cities of Vista, Carlsbad, and San Marcos; San Diego County</u>	<u>138 kV tie line on a 4-mile alignment in existing SDG&E ROW from Shadowridge Substation in Vista to Meadowlark Junction in San Marcos</u>	<u>In operation</u>	<u>2010</u>
2-6	<u>Artis Senior Living</u>	<u>North side of San Elijo Road, east of Rancho Santa Fe Road</u>	<u>0.4 mile from Segment 2</u>	<u>City of San Marcos</u>	<u>39,951 SF Senior Living Complex; 64 beds</u>	<u>Proposed</u> <u>unknown</u>	<u>unknown</u>
2-7	<u>Loma San Marcos</u>	<u>1601 San Elijo Road</u>	<u>0.2 mile from Segment 2</u>	<u>City of San Marcos</u>	<u>179,535 SF facility (61,650 SF movie studio, 108,135 SF of storage, and 9,750 SF office space).</u>	<u>2019</u>	
2-8	<u>Southlake Park Phase I</u>	<u>Twin Oaks Valley Road, South of Village Drive</u>	<u>2.0 miles from Segment 2</u>	<u>City of San Marcos</u>	<u>1.5 acres of parking lot and fishing dock</u>	<u>unknown</u>	<u>unknown</u>
Segment 3							
3-1	Harmony Grove Village South Project	Intersection of Harmony Grove Road and Country Club Drive	0.56 mile from Segment 3	San Diego County	Expand the contiguous Harmony Grove Village (HGV) to include a residential component providing a mix of residential and community center/limited commercial uses.	Approved	Under construction
3-2	Wisner TM, Johnston Road	Western end of Avenida Del Diablo	0.5 mile from Segment 3	City of Escondido	Annexation and single-family residential subdivision	Approved 2018	TBD
3-3	HARRF Collections Facility	Intersection of Avenida Del Diablo and Citracado Parkway	0.45 mile from Segment 3	City of Escondido	Three maintenance buildings, 14,875 square feet	Approved 2018	TBD
3-4	Innovative Industrial	Intersection of Harmony Grove Road and Howard Avenue, adjacent to Escondido Creek	0.35 mile from Segment 3	City of Escondido	210,000 square foot industrial.	Under construction	TBD
3-5	Harmony Grove Specific Plan	Empty lot where Kauana Loa Drive becomes Harmony Grove Road	Adjacent to Segment 3 and staging areas	City of Escondido	Industrial subdivision.	Anticipated	TBD
3-6	Citracado Parkway Extension	Citracado Parkway from Harmony Grove Village Parkway to Andreasen Drive.	Adjacent to Segment 3 and staging areas	City of Escondido	This project extends Citracado Parkway south from Harmony Grove Village Parkway to Andreasen Drive.	2017	2022

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 3 (cont.)							
3-7	ERTC Kidney Dialysis Center	1955 Citracado Parkway	Adjacent to Segment 3 and staging areas	City of Escondido	12,000 square feet medical office and dialysis center.	Review completed	TBD
3-8	Valiano Project	Located in unincorporated San Diego County within the San Dieguito Community Planning Area near Escondido.	0.9 mile from Segment 3	San Diego County	Residential development of 326 homes on 239 acres. Includes 36.5 acres of agriculture easement and 28.2 acres of biological open space.	Planning Commission 2018	TBD
3-9	Office Condos (Jungman Specific Plan)	West side of Citracado Parkway, across Harveson Place	Approximately 800 feet from Segment 3	City of Escondido	Mixed use: 20,000 square feet of office space, 36 condominiums	Anticipated	TBD
3-10	ERTC Medical Office (EAST)	East side of Citracado Parkway, adjacent to Harveson Place	Approximately 100 feet from Segment 3	City of Escondido	74,000-square-foot medical office, part of the Escondido Research and Technology Center.	Approved 2015	In Progress
3-11	Stone Brewery Hotel	Directly across the street from 1999 Citracado Parkway	Approximately 200 feet from Segment 3	City of Escondido	99-room boutique hotel	Held at applicants request	TBD
3-12	Ford/Hyundai Dealership	Intersection of South Auto Parkway and Howard Avenue	0.55 mile from Segment 3	City of Escondido	Two showrooms and a wash/detail building.	Under construction	TBD
3-13	Public Works Yard Relocation	West Washington Street and North Spruce Street	1.3 miles from Segment 3	City of Escondido	Future relocation of the Public Works Yard. Project components include site selection, acquisition, environmental documentation, and design for the future site. Current yard site as a high priority area targeted for redevelopment.	October 2013	Dependent on funding (budget through 2020)
3-14	SR-78 Eastbound Auxiliary Lane Improvement	SR-78 between Woodland Parkway and Nordahl Road, and East Mission Road.	0.45 mile from Segment 3 and 1.0 mile from staging area	City of San Marcos	Construct an eastbound auxiliary lane on SR-78 between Woodland Parkway and Nordahl Road including the widening of the Mission Road undercrossing and an additional merging lane between Barham Drive on-ramp and the Nordahl Road on-ramp.	2015	2018
3-15	Woodland Parkway SR-78 interchange	Woodland Parkway, Barham Drive, Rancheros Drive, SR 78 Interchange.	1.65 miles east of Escondido Substation, 3.35 miles west of San Marcos Substation and Segment 1	City of San Marcos	Reconstruction of SR-78 overcrossing, reconfigure on/off ramps, widen and realign adjacent portions of Woodland Parkway, Barham Drive and Rancheros Drive.	2016	2018
3-16	Barham Drive Widening and Street Improvements	West La Moree to eastbound SR-78 Barham Drive off-ramp.	2.1 miles from Segment 3	City of San Marcos	Widening to 6-lane prime arterial from West La Moree to eastbound SR-78 Barham Drive off-ramp.	2015	2018

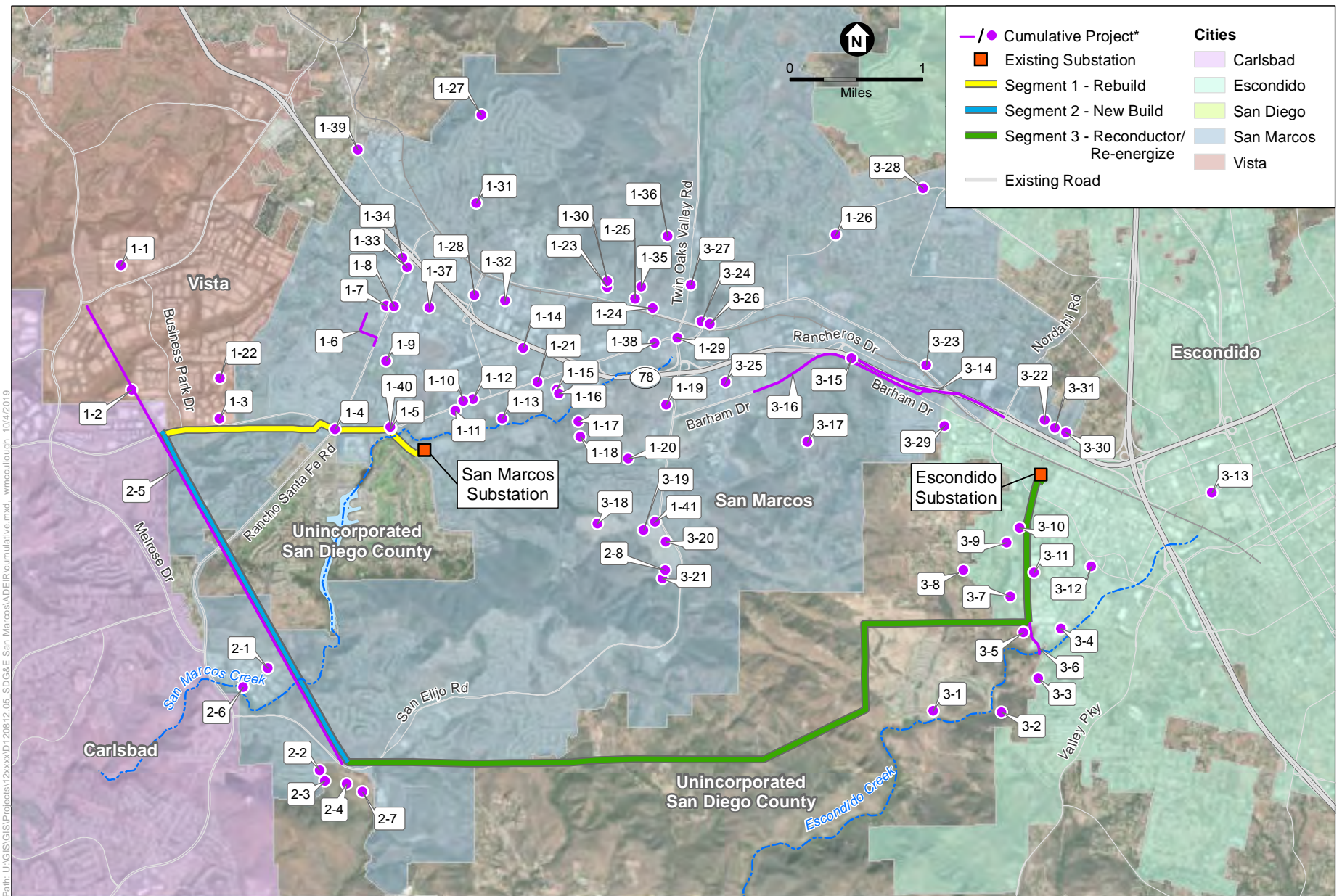
TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
Segment 3 (cont.)							
3-17	Sandy Lane Estates	La Moree Road and Shady Lane	1.7 miles from Segment 3 and Escondido Substation	City of San Marcos	8 single-family residences, subdivision of 8.19-acre parcel. <u>9-lot subdivision.</u>	Under review	TBD <u>2019</u>
3-18	Rancho Coronado Park	West of South Twin Oaks Valley Road and north of San Elijo Road.	1.45 miles from Segment 3	City of San Marcos	Create multi-use park at former Hanson quarry site.	2018	2019
3-19	Brookfield Residential Properties (Rancho Tesoro)	South Twin Oaks Valley Road South of Craven Road	2.75 miles west of Escondido Substation	City of San Marcos	346 single-family homes.	Approved	Under construction <u>2019</u>
3-20	Brookfield Residential Multi-Family	Twin Oaks Valley Road	2.75 miles west of Escondido Substation	City of San Marcos	Construction of 220 residential condominium units on 23.22 acres.	Approved 2017	TBD <u>2021</u>
3-21	South Lake Community Park	South Lake off of South Twin Oaks Valley Road	2.0 miles from Segment 1 and 3.0 miles from Segment 3	City of San Marcos	Construct park entry road, parking spaces, restroom, new trail on city property to connect to existing trail surrounding the lake and install self-contained restroom and other amenities at lake grounds.	2015	2018
<u>3-22</u>	<u>JR Legacy II, LLC/Global Carte</u>	<u>Southwest corner of Montiel Road and Leora Lane</u>	<u>0.42 mile from Segment 3</u>	<u>City of San Marcos</u>	<u>128-room hotel with indoor pool and 141 parking spaces.</u>	<u>2019</u>	<u>unknown</u>
<u>3-23</u>	<u>Mission 24</u>	<u>1210 E. Mission Road</u>	<u>1.2 mile from Segment 3</u>	<u>City of San Marcos</u>	<u>Residential: Multi-Family, 24 condominium units</u>	<u>2020</u>	<u>unknown</u>
<u>3-24</u>	<u>Mission 316 West</u>	<u>Mission Road at Woodward Street</u>	<u>2.7 miles from Segment 3</u>	<u>City of San Marcos</u>	<u>67 multi-family condominiums.</u>	<u>2021</u>	<u>unknown</u>
<u>3-25</u>	<u>Mesa Rim Climbing Gym</u>	<u>285 Industrial Street</u>	<u>2.4 miles from Segment 3</u>	<u>City of San Marcos</u>	<u>28,200 SF commercial recreation facility (rock climbing gym)</u>	<u>2020</u>	<u>unknown</u>
<u>3-26</u>	<u>Lanikai Senior Residential Facility</u>	<u>E. Mission Road and Woodard Street (west side)</u>	<u>2.7 miles from Segment 3</u>	<u>City of San Marcos</u>	<u>115 residential units</u>	<u>unknown</u>	<u>unknown</u>
<u>3-27</u>	<u>California Allstar Cheerleading, Inc.</u>	<u>East side of Twin Oaks Valley Road and Christen Way</u>	<u>3.0 miles from Segment 3</u>	<u>City of San Marcos</u>	<u>28,137 SF industrial building (cheerleading school).</u>	<u>2022</u>	<u>unknown</u>
<u>3-28</u>	<u>Hallmark Communities (Borden Road 22)</u>	<u>1200 Borden Road</u>	<u>2.3 miles from Segment 3</u>	<u>City of San Marcos</u>	<u>22-unit detached single-family home subdivision</u>	<u>2021</u>	<u>unknown</u>
<u>3-29</u>	<u>The Sunrise Project</u>	<u>Barham Drive, West of Myers Avenue</u>	<u>0.8 mile from Segment 3</u>	<u>City of San Marcos</u>	<u>192 multi-family dwelling units</u>	<u>2021</u>	<u>Unknown</u>

TABLE 3.21-1 (CONTINUED)
CUMULATIVE SCENARIO

ID	Project Name	Project Location	Approximate Distance from Project	Jurisdiction	Project Description	Status/ Construction Start Date	Status/ Construction End Date
<u>Segment 3 (cont.)</u>							
<u>3-30</u>	<u>Montiel Commercial</u>	<u>2355/2357 Montiel Road</u>	<u>0.4 mile from Segment 3</u>	<u>City of San Marcos</u>	<u>32,971 SF office space</u>	<u>Unknown</u>	<u>Unknown</u>
<u>3-31</u>	<u>Montiel Road Partners (Montiel Road 9, LLC)</u>	<u>Montiel Road</u>	<u>0.4 mile from Segment 3</u>	<u>City of San Marcos</u>	<u>9-lot subdivision; 8 dwelling units</u>	<u>2019</u>	<u>Unknown</u>

SOURCES: City of Carlsbad, 2018a, 2018b; Conley, 2018; del Solar, 2018; City of Escondido, 2018a, 2018b; Farace, 2018; San Diego County, 2018; City of San Marcos, 2018a, 2018b; SDG&E, 2017; Tasher, 2018; City of Vista, 2018.



* For detailed list of cumulative projects see Table 3.21-1

SOURCE: SDGE, 2018; ESA, 2018

TL 6975 San Marcos to Escondido Project

Figure 3.21-1
Cumulative Projects

Mitigation Monitoring, Reporting, and Compliance Program

The text on Draft IS/MND page 5-5 is revised as follows:

The CPUC's Energy Division may approve requests by SDG&E for minor Project refinements that may be necessary due to the final engineering of the Project, so long as such minor Project refinements are located within the geographic boundary of the study area of the IS/MND and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the IS/MND; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional discretionary permit requirement.

~~The CPUC, along with its mitigation monitor, will ensure that any minor Project refinement process, which will be designed specifically for the Project, or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements; no minor Project refinement will be approved by the CPUC if it creates new significant environmental impacts. As defined in this MMRC, a minor Project refinement should be strictly limited to minor Project changes that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A change to the Project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved Project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the mitigation monitor assigned to the construction for their review and CPUC approval. In some cases, a minor Project refinement also may require approval by a CEQA responsible agency.~~

CHAPTER 4

Mitigation Monitoring, Reporting, and Compliance Program

Summary of Revisions to this MMRC

This chapter includes an updated version of Draft IS/MND Table 5-1, Mitigation Monitoring, Reporting, and Compliance Program for the SDG&E San Marcos to Escondido TL6975 69kV Project. The purpose of the updated table in this chapter is to provide a single comprehensive list of impacts, mitigation measures, Applicant Proposed Measures (APMs), monitoring and reporting requirements, and timing of implementation. Therefore, the text revisions and additions to impacts, mitigation measures, and APMs that are shown in Chapter 3 of this Final MND are shown in final form in this chapter and not depicted in underline and strike-out format.

Following review of public comments received during the public review period, the CPUC has determined that no new significant environmental impacts are identified in this Final MND. Additionally, no mitigation measures presented in the Draft IS/MND were deleted in this Final MND. However, a few minor modifications were made to Mitigation Measures BIO-3, CUL-1, CUL-4, and NOI-1. The changes to these Mitigation Measures are shown in underline and strikeout format in Chapter 3 for the reader's reference.

After review of the California Department of Fish and Wildlife comment letter, provided in Chapter 2 of this Final MND, the implementing actions, monitoring/reporting requirements, and timing notes also have been clarified for Applicant Proposed Measures BIO-1 through BIO-4 to ensure proper mitigation and/or restoration of the affected areas.

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM

San Diego Gas & Electric's San Marcos to Escondido TL6975 69 kV Project (APPLICATION NO. A.17-11-010)

Introduction

This document describes the mitigation monitoring, reporting, and compliance program (MMRCP) for ensuring the effective implementation of the mitigation measures required for approval by the California Public Utilities Commission (CPUC) of the application by the San Diego Gas and Electric Company's (SDG&E) to construct, operate and maintain the SDG&E San Marcos to Escondido Tie Line (TL) 6975 69kV Project (Project). The MMRCP includes all measures proposed by SDG&E, as well as all mitigation measures identified by the CPUC to reduce potentially significant impacts to less than significant.

If the Project is approved, this MMRCP would serve as a self-contained general reference for the MMRCP adopted by the CPUC for the Project. If and when the Project is approved, the CPUC will compile the Final MMRCP to assure that it includes all measures as adopted.

California Public Utilities Commission – MMRCP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a reporting or monitoring program when it adopts a mitigated negative declaration for a project that could have potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of a MMRCP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMRCP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The CPUC will address its responsibility under Public Resources Code Section 21081.6 when it takes action on SDG&E's application. If the CPUC approves the application, it also will adopt a MMRCP that includes the mitigation measures, as well as the APMs, the implementation of which will ultimately made conditions of approval by the CPUC.

Because the CPUC must decide whether or not to approve the SDG&E application and because the application may cause either direct or reasonably foreseeable indirect effects on the environment, CEQA requires the CPUC to consider the potential environmental impacts that could occur as the result of its decision and to consider mitigation for any identified significant environmental impacts.

If the CPUC approves SDG&E's application for authority to reinforce the electric transmission and distribution system, SDG&E would be responsible for implementation of all adopted Applicant Proposed Measures (APM) and CPUC-recommended mitigation measures governing the construction, operation, and maintenance of the Project. Though other federal, State, and local agencies would have permit and approval authority over some aspects of the Project, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by the adopted IS/MND. All approvals and permits obtained by SDG&E would be submitted to the CPUC prior to commencing the activity for which the permits and approvals were obtained.

In accordance with CEQA, the CPUC reviewed the impacts that would result from approval of the application. The activities considered include installation of new overhead single-circuit electric power line structures, rebuild of existing structures from single circuit to double circuit, and the reconductoring and re-energizing of existing conductors, pursuant to CPUC General Order (GO) 131-D. This would involve removal and/or replacement of power poles, placement of new poles and other distribution line upgrades. The Project is located primarily in the cities of San Marcos and Escondido and unincorporated areas in northern San Diego County, California. It would originate at the San Marcos Substation on the west and terminate at the Escondido Substation on the east and would be located within SDG&E right-of-way (ROW). To fully accommodate the Project, 1.2 acres of additional ROW would be acquired in San Marcos.

The CPUC review concluded that implementation of the Project would not result in any significant unmitigable impacts. All impacts would be mitigated to less-than-significant levels or would be less than significant. SDG&E has agreed to incorporate all the CPUC-recommended mitigation measures into the Project. The CPUC has included the stipulated mitigation measures as conditions of approval of the application and has circulated an IS/proposed MND for public review.

The attached IS/MND presents and analyzes potential environmental impacts that would result from construction, operation, and maintenance of the Project, and recommends mitigation measures as appropriate. Based on the IS/MND, approval of the application would have no impact or less than significant impacts in the following areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Mineral Resources
- Population and Housing

The IS/MND indicates that approval of the application would result in potentially significant impacts in the areas listed below, and so identifies adopted APMs and mitigation measures that have been accepted by SDG&E to reduce the significance below established thresholds.

- Biological Resources
- Cultural Resources
- Geology, Soils, Seismicity, and Paleontological Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor the Project, if approved, to ensure that the required mitigation measures and adopted APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMRCP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures and APMs required and relied upon by the CPUC are implemented and that mitigated environmental impacts are reduced to a less-than-significant level. The CPUC has the authority to halt any activity associated with the Project if the activity is determined to be a deviation from the approved Project or the adopted APMs and mitigation measures.

Consistent with CEQA Guidelines section 15097(a), the CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC's Energy Division may approve requests by SDG&E for minor Project refinements that may be necessary due to the final engineering of the Project, so long as such minor Project refinements are located within the geographic boundary of the study area of the IS/MND and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the IS/MND; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional discretionary permit requirement.

As defined in this MMRCP, a minor Project refinement should be strictly limited to minor Project changes that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A change to the Project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved Project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and

the mitigation monitor assigned to the construction for their review and CPUC approval. In some cases, a minor Project refinement also may require approval by a CEQA responsible agency.

Enforcement and Responsibility

The CPUC is responsible for enforcing the procedures for monitoring through the mitigation monitor. The mitigation monitor shall note any problems with implementation of mitigation, notify appropriate agencies or individuals about such problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the Project if the activity is determined to be a deviation from the approved Project or adopted APMs or mitigation measures. The CPUC may assign its authority to its mitigation monitor.

Mitigation Compliance Responsibility

SDG&E is responsible for successfully implementing all of the adopted APMs and mitigation measures in this MMRC. The MMRC contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

SDG&E shall inform the CPUC and its mitigation monitor in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its mitigation monitor will assess whether alternative mitigation is appropriate and specify to SDG&E the subsequent actions required.

Dispute Resolution Process

The following procedure will be observed for dispute resolution between CPUC staff and the applicant:

- Disputes and complaints should be directed to the CPUC's designated Project Manager for resolution.
- Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved Project.

General Monitoring Procedures

Mitigation Monitor

Many of the monitoring procedures will be conducted during the construction phase of the Project. The CPUC and the mitigation monitor are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SDG&E. To oversee the monitoring procedures and to ensure success, the mitigation monitor assigned to the construction must be on site during that portion of construction that has the potential to create a significant

environmental impact or other impact for which mitigation is required. The mitigation monitor is responsible for ensuring that all procedures specified in this MMRCPP are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures and APMs require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in this MMRCPP, will be taken:

- SDG&E shall require all contractors to comply with the conditions of Project approval, including all adopted APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCPP.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all adopted APMs and mitigation measures requiring their attention.

SDG&E will also be responsible for retaining the qualified archaeologists, qualified biologists/biological monitors, qualified paleontologists, licensed engineers, qualified environmental trainers, Lead Environmental Inspectors, etc., specified in the adopted APMs and mitigation measures.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the mitigation monitor assigned to the construction. A monitoring record form will be submitted to the mitigation monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the mitigation monitor. A checklist will be developed and maintained by the mitigation monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The mitigation monitor will note any problems that may occur and take appropriate action to rectify the problems. SDG&E shall provide the CPUC with written quarterly reports of the Project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the Project. Quarterly or annual reports shall be required as long as mitigation measures are applicable.

Public Access to Records

The CPUC will make monitoring records and reports available for public inspection upon request. The CPUC and SDG&E will develop a filing and tracking system.

Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMRCPP to ensure compliance during project implementation (Pub. Res. Code §21081.6):

- The CPUC may conduct a comprehensive review of measures which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution Process outlined above; and
- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the Project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

Mitigation Monitoring, Reporting and Compliance Program

The table attached to this MMRCPP presents a compilation of the adopted APMs and mitigation measures in the IS/MND. The purpose of the table is to provide a single comprehensive list of impacts, mitigation measures, adopted APMs, monitoring and reporting requirements, and timing. SDG&E proposed APMs to minimize impacts to the environment from implementation of the Project. In some instances, those APMs have been superseded by CPUC-recommended mitigation measures, as described in the IS/MND. The table below identifies only those APMs that have not been superseded and will be implemented as part of the Project.

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Aesthetics				
	No mitigation required.			
Agriculture and Forestry Resources				
	No mitigation required.			
Air Quality				
	No mitigation required.			
Biological Resources				
<i>Sensitive and Special-Status Areas and Species</i>	APM BIO-1: SDG&E will conduct all construction and operation and maintenance activities in accordance with NCCP Operational Protocols to avoid and minimize impacts on biological resources.	SDG&E and its contractors to implement NCCP Operational Protocols. SDG&E to provide Operational Protocols to CPUC mitigation monitor.	CPUC mitigation monitor to inspect compliance with NCCP Operational Protocols. Pre-activity surveys and reporting must be completed prior to issuance of an NTP for ground disturbance.	During all phases of construction, operation and maintenance of the Project
	APM BIO-2: All earth-moving equipment will be free of mud and vegetative material before being mobilized onto work areas associated with the Project.	SDG&E and its contractors to remove mud and vegetative material and provide inspection to ensure cleanliness of earth-moving equipment prior to bringing it into Project work areas.	CPUC mitigation monitor to inspect compliance at entrance to and within work areas.	Prior to and during construction
	APM BIO-3: Except when not feasible due to physical or safety constraints, all Project construction vehicle movement will be restricted to the Project work areas, existing roads, and access roads constructed as a part of the Project and mapped by SDG&E in advance of construction. Approval from a biological monitor will be obtained prior to vehicle travel off of existing access roads.	SDG&E and its contractors to prohibit construction vehicle movement outside of Project work areas, existing roads, and Project access roads.	SDG&E biological monitor to report all impacts associated with vehicle travel off of existing roads. CPUC mitigation monitor to inspect compliance.	Prior to and during construction

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources (cont.)				
Sensitive and Special-Status Areas and Species (cont.)	APM BIO-3 (cont.)	SDG&E and its contractors to obtain biological monitor approval for vehicle travel off-road pursuant to NCCP Operational Protocols. SDG&E to provide Operational Protocols to CPUC mitigation monitor.		
	APM BIO-4: Civil and land survey personnel will keep survey vehicles on existing roads. During Project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat prior approval will be required from the Project's biological monitor. Hiking off roads or paths for survey data collection will be allowed year-round as long as all of the other applicable APMs are met.	SDG&E and its contractors to prohibit survey vehicle travel off-road. SDG&E and its contractors to obtain biological monitor approval for survey work in sensitive habitat pursuant to NCCP Operational Protocols. SDG&E to provide Operational Protocols to CPUC mitigation monitor.	SDG&E biological monitor to report all impacts associated with on-foot activities off existing roads. CPUC mitigation monitor to inspect compliance.	During Project surveying activities
	APM BIO-5: Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist. The flagging and/or fencing will be maintained in place for the duration of construction. Flagged and fenced areas will be avoided to the extent practicable during construction activities in that area. If impacts on sensitive plant species are unavoidable, SDG&E will perform soil and plant salvage activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of the NCCP. These include the stockpiling of native soil in the area where Nuttall's scrub oak and wart-stemmed Ceanothus occur and top soil replacement after construction. Quality assurances and success criteria milestones for the restoration area as a whole will conform to the standards provided in Enhancement Section 7.2.1 of the NCCP.	SDG&E and its contractors to flag and fence areas of sensitive plant populations that require protection. If impacts are unavoidable, SDG&E and its contractors will confer to the standards discussed in Section 7.2.1 of the NCCP.	CPUC mitigation monitor to inspect and confirm compliance with Section 7.2.1 of the NCCP.	Up to 30 days prior to construction and during all phases of construction activities

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Biological Resources (cont.)				
Sensitive and Special-Status Areas and Species (cont.)	<p>APM BIO-6: Coastal California Gnatcatcher. Prior to construction, SDG&E shall retain a qualified biologist to conduct surveys for the coastal California gnatcatcher in suitable habitat, to determine if any active nests are within or in the immediate vicinity of proposed construction activities. If feasible, SDG&E will avoid construction during the peak breeding season (February 15 – August 31) for coastal California gnatcatcher and migratory birds. When it is not feasible to avoid trimming or removal of vegetation or during the peak breeding season, SDG&E will perform a site survey in the area where the work is to occur. Trimming or removal of vegetation during the peak breeding season will require a preconstruction survey by a qualified biologist to confirm that active nests will not be affected. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest. If the nesting and/or breeding activities are being conducted by a federal or state-listed species, SDG&E will consult with the USFWS and CDFW as necessary. Monitoring of the nest will continue until the birds have fledged or construction is no longer occurring on site.</p> <p>Migratory Birds. Trimming or removal of vegetation during the peak breeding season (February 15 to August 31) will require a pre-construction survey by a qualified biologist to confirm that active nests will not be affected. If an active nest is detected within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest.</p>	<p>SDG&E and its contractors to conduct pre-construction survey to determine presence or absence of nesting birds and implement recommendations of biological monitor regarding nesting birds pursuant to NCCP Operational Protocols.</p> <p>SDG&E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance and review consultation with USFWS and CDFW if nesting and breeding activities found in the vicinity of the Project are a federal or state-listed species.</p>	<p>Up to 30 days prior to construction and during all phases of construction activities</p>
	<p>APM BIO-7: If a raptor nest is observed during preconstruction surveys, a qualified biologist would determine if it is active. If the nest is determined to be active, the biological monitor would monitor the nest to ensure nesting activities and/or breeding activities are not substantially adversely affected. If the biological monitor determines that Project activities are disturbing or disrupting nesting and/or breeding activities, the monitor will make recommendations to reduce the noise and/or disturbance in the vicinity of the nest.</p>	<p>SDG&E and its contractors to implement recommendations of biological monitor pursuant to NCCP Operational Protocols.</p> <p>SDG&E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>Conduct pre-construction surveys prior to and carry out recommendations throughout construction</p> <p>CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>Up to 30 days prior to construction and during all phases of construction activities</p>
	<p>APM BIO-8: A biological monitor will be present during all ground-disturbing and vegetation removal activities. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the biological monitor will survey the site to ensure that no special-status species will be impacted.</p>	<p>SDG&E and its contractors to implement recommendations of biological monitor pursuant to the NCCP Operational Protocols.</p> <p>SDG&E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>Prior to and during all ground disturbing and vegetation removal activities</p>

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Sensitive and Special-Status Areas and Species (cont.)	APM BIO-9: Wherever possible, vegetation will be left in place or mowed, instead of grubbed, to avoid excessive root damage and to allow for regrowth and to minimize soil erosion.	SDG&E and its contractors to leave vegetation in place and use mowing instead of grubbing.	CPUC mitigation monitor to inspect and confirm compliance.	During all project activities
Special-Status Species	Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts. Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA). If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.	SDG&E and its contractors to provide proof of sufficient mitigation/take credits or take authorization from the identified agencies to the CPUC.	SDG&E to provide the most recent documentation to CPUC Project Manager and mitigation monitor in order to confirm compliance that sufficient mitigation/take credits are available to the Project. If sufficient mitigation/take credits are not available, then take authorization from the identified agencies must be submitted.	Prior to approval of the NTP and construction
Active Nests	Mitigation Measure BIO-2: Establishment of Cylindrical Construction Buffers. The biological monitor shall establish a three-dimensional cylinder-shaped buffer around active nests that have the potential to be affected by helicopter use or ground-based activities associated with helicopter use. A vertical buffer shall extend at least 300 feet vertically above the location of the nest and at least 300 feet horizontally for passerines (or 500 feet vertically and horizontally for raptors and 500 feet vertically and 0.5 mile horizontally for white-tailed kite). The biological monitor and SDG&E project manager shall monitor the helicopter tracks (i.e., flight patterns, durations) daily to ensure compliance with these established buffers. This buffer assumes the helicopter activities are temporary or infrequent in nature (no longer than one minute [e.g., pass-by] or visit the site once in a day) If helicopter work occurs in the vicinity of an active nest for an extended period of time, the biological monitor may determine, based on the nature of the work and nest monitoring observations, that the buffer is insufficient for the nest and adjust the buffer distance appropriately.	SDG&E and its contractors shall monitor the helicopter tracks daily and implement recommendations of the biological monitor.	CPUC mitigation monitor to inspect and confirm compliance.	Daily prior to any helicopter use prior to and during construction
Jurisdictional Areas	Mitigation Measure BIO-3: Avoid Jurisdictional Resources. To avoid impacts on jurisdictional areas, SDG&E and its contractor shall flag work area limits and work shall be restricted to the flagged limits. Additionally, when clearing or grading occurs within 25 feet of a jurisdictional feature, silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated run-off or sedimentation. A qualified biologist shall verify that silt fencing and construction work is properly installed and are located outside of jurisdictional areas to confirm their avoidance. Monitoring shall take place during rain events to confirm the integrity of silt fencing and verify runoff does not enter jurisdictional areas.	SDG&E and its contractors to flag work area limits, install silt fencing as defined, monitor silt fencing during rain events, and repair as necessary.	CPUC mitigation monitor to inspect and confirm compliance, including inspection during rain events.	Prior to and during construction, including rain events

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources				
Historical and Archaeological Resources	Mitigation Measure CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&E. The Qualified Archaeologist, or a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall carry out all APMs and mitigation measures related to archaeological resources.	SDG&E and its contractors shall retain a Qualified Archaeologist as described in the measure and implement all APMs and cultural resource mitigation measures.	CPUC mitigation monitor to inspect and confirm implementation of appropriate APMs and mitigation measures.	Prior and during construction
	Mitigation Measure CUL-2: Pre-Construction Cultural Resources Sensitivity Training. Prior to the start of any ground-disturbing activity, the Qualified Archaeologist shall prepare cultural resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the Qualified Archaeologist. The Qualified Archaeologist shall determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training shall be conducted for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. SDG&E shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	SDG&E to ensure all construction personnel attends the cultural resources sensitivity training and provide proof of attendance.	CPUC mitigation monitor to confirm documentation that training occurred and attendance of construction personnel.	Prior to construction
	Mitigation Measure CUL-3: Development and Implementation of Cultural Resources Monitoring Plan. Prior to the start of any Project-related ground disturbing activities the Qualified Archaeologist shall prepare a Cultural Resources Monitoring Plan (CRMP). The CRMP shall stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground disturbing activities within 250 feet of P-37-032160 and within 100 feet of the remaining 10 archaeological resources (P-37-004495, -004499, -005501, -007306, -010551, -010550, -011442, -012209, -034831, and TL6975-S-5) that have the potential to contain or are known to contain subsurface archaeological deposits, as well as all ground disturbing activities within Segment 3 and the easternmost 500 feet of Segment 2. The CRMP shall include monitoring protocols to be carried out during Project construction. The CRMP shall stipulate that a Native American monitor associated with one or more of the Native American groups that have expressed interest in the Project (i.e., San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Lipay Nation) be retained to monitor all Project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring shall be consulted regarding the scheduling of monitors. A Native American monitoring schedule shall be incorporated into the CRMP.	Qualifies Archaeologist to prepare CRMP. SDG&E and its contractors to implement the Cultural Resources Monitoring Plan.	CPUC to review and approve CRMP. CPUC mitigation monitor to confirm compliance.	Prior to any Project-related ground disturbing activities and during construction

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Cultural Resources (cont.)				
Historical and Archaeological Resources (cont.)	<p>Mitigation Measure CUL-3 (cont.)</p> <p>The CRMP shall contain an allowance that the Qualified Archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and SDG&E, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural resources during Project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery shall cease until a treatment plan is developed by the Qualified Archaeologist in coordination with SDG&E and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the Project if avoidance of a significant resource is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan shall also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories. The CRMP shall be submitted to SDG&E and CPUC for review and approval prior to the start of Project-related ground disturbance, as well as to the Native American groups that have expressed interest in the Project (i.e. San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Iipay Nation) for review and comment.</p>			
	<p>Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160. Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design shall be submitted to SDG&E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E, and submitted to the San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center.</p>	<p>Qualifies Archaeologist to prepare research design. SDG&E to review and approve research design prepared by the Qualified Archaeologist and ensure implementation of approved design.</p>	<p>CPUC to review and approve research design and confirm adequate consultation with San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians.</p>	<p>Prior to any Project-related ground disturbing activities and data recovery excavations</p>

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Historical and Archaeological Resources (cont.)	Mitigation Measure CUL-5: Exclusionary Fencing. Prior to Project-related ground disturbing activities, exclusionary fencing shall be installed to ensure that the five previously recorded archaeological sites within or immediately adjacent to the Project alignment that have surface manifestations (P-37-004495, -004499, -007306, -012209, and TL6975-S-5) are not inadvertently impacted during Project implementation. The exclusionary fencing shall encompass the mapped site boundaries plus a 25-foot radius to ensure an appropriate buffer is maintained between the sites and Project-related ground disturbing activities. For the four archaeological resources bisected by Project access roads (P-37-004495, -004499, -007306, and TL6975-S-5), the exclusionary fencing shall be established along the shoulder of the existing roads. To ensure avoidance, the exclusionary fencing shall be marked with signs indicating that staff associated with the Project are not to go beyond the limits of the fencing. The exclusionary fencing shall not identify the protected areas as demarcating archaeological resources in order to discourage unauthorized disturbance, vandalism, or collection of artifacts.	SDG&E and its contractors to install exclusionary fencing and implement measure as defined regarding signage.	CPUC mitigation monitor to inspect and confirm fencing and appropriate signage has been installed.	Prior to Project-related ground disturbing activities
	Mitigation Measure CUL-6: Pre-Construction Surveys. Prior to the start of Project-related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5) shall be conducted to map and collect all artifacts located within the road beds. Artifact mapping shall be conducted using a hand held GPS unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians.	SDG&E and Qualified Archaeologist to implement measure as defined and coordinate the disposition of the artifacts with the San Luis Rey Band of Mission Indians.	CPUC mitigation monitor to inspect mapping and collection; confirm consultation and compliance with the San Luis Rey Band of Mission Indians.	Prior to Project-related ground disturbing activities
	Mitigation Measure CUL-7: Road Maintenance within Archaeological Sites. During Project implementation, routine road maintenance, including but not limited to grading and blading, shall be avoided within the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5). Should maintenance activities such as drainage or culvert repairs be required to stabilize the access road, all ground disturbing activities within 100 feet of the four archaeological sites shall be monitored as stipulated in the CRMP.	SDG&E and its contractors will avoid routine road maintenance in the locations specified and implement measure as defined.	CPUC mitigation monitor to inspect and confirm compliance.	During construction
Human Remains	Mitigation Measure CUL-8: Inadvertent Discovery of Human Remains. If human remains are uncovered during Project construction, all work within 100 feet of the find shall be immediately halted, and the San Diego County coroner shall be contacted to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the County Coroner shall contact the California Native America Heritage Commission (NAHC), in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC shall then identify a Most Likely Descendant (MLD) of the deceased Native American, who shall then help determine what course of action should be taken in the disposition of the remains. Per Public Resources Code Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	SDG&E and its contractors shall halt work and notify the San Diego County Coroner if human remains are uncovered. SDG&E and its contractors to follow all protocols in Section 15064.5 (e) (1) of the CEQA Guidelines and instructions from the NAHC.	CPUC mitigation monitor to confirm compliance with CEQA Guidelines, Health and Safety Codes, and Public Resources Codes mentioned in measure if human remains are discovered.	During construction

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Energy				
	No mitigation required.			
Geology, Soils, Seismicity, and Paleontological Resources				
Ground Failure, Slope Instability, and Landslides	<p>Mitigation Measure GEO-1: Geotechnical Report. The structural requirements of the California Building Code (CBC) are applicable to certain structural components of the Project, including retaining walls, screen walls, fences, and control shelters. SDG&E and/or its contractors shall design such structures to comply with such CBC standards and shall adhere to and implement all design recommendations and parameters established in the Project's Geotechnical Investigation Report by GEOCON Inc. and the AC Interference Analysis & Mitigation System Design by ARK Engineering & Technical Services. In addition, SDG&E shall retain a California registered professional engineer(s) to prepare a supplemental geotechnical report. This report shall address specific geotechnical hazards that were not addressed in the Geotechnical Investigation Report, and provide recommendations for mitigating such hazards. The analysis in that report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • recommendations to address the liquefaction risk within the Quaternary alluvium along Segment 1 and 3, if any; • recommendations to address the corrosive soils that are present along Segments 1 and 2, if any, which pose a risk to the concrete pier foundations and direct bury poles; • recommendations to address the landslide potential along Segment 2, if any, where planned ground disturbing activities could trigger landslides; and, • evaluation of the site-specific conditions and recommendations specific to micropiles where proposed, if final design includes the use of micropiles. <p>The recommendations shall ensure that when incorporated, the Project shall not increase the potential for ground failure, slope instability, and/or landslides, and shall be resistant to damage from ground shaking, ground failure, corrosive soils, unstable slopes, and landslides. SDG&E shall submit the supplemental geotechnical report to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction.</p>	<p>SDG&E and its contractors to implement recommendations and parameters discussed in the Project's Geotechnical Investigation Report and the AC Interference Analysis & mitigation System Design report.</p> <p>SDG&E and its contractors shall retain a California registered professional engineer to prepare a supplemental geotechnical report mitigating hazards, as required in the measure.</p>	CPUC PM to review and approve supplemental geotechnical report(s). CPUC mitigation monitor to confirm compliance.	At least 30 days prior to construction
Paleontological Resources	<p>Mitigation Measure PALEO-1: Project Paleontologist. SDG&E or its contractor shall retain a qualified professional paleontologist (qualified paleontologist) meeting the Society of Vertebrate Paleontology (SVP) standards as set forth in the "Definitions" section of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) prior to the approval of demolition or grading permits. The qualified paleontologist shall attend the Project kick-off meeting and Project progress meetings on a regular basis, shall report to the site in the event potential paleontological resources are encountered, and shall implement the duties outlined in Mitigation Measures PALEO-2 through PALEO-4.</p>	SDG&E and its contractors to shall retain a qualified paleontologist as described in the measure and attend the Project kick-off meeting and Project progress meetings on a regular basis.	CPUC mitigation monitor to confirm paleontologist qualifications and the completion of trainings/ meetings.	Project meetings (i.e., kick-off and regular basis meetings) and during all project activities (i.e., construction, operation, and maintenance)

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Geology, Soils, Seismicity, and Paleontological Resources (cont.)				
Paleontological Resources (cont.)	<p>Mitigation Measure PALEO-2: Worker Training. Prior to the start of any ground disturbing activity (including vegetation removal, pavement removal, etc.), the qualified paleontologist shall prepare paleontological resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The paleontological resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the qualified paleontologist. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found, as outlined in the approved Paleontological Resources Monitoring and Mitigation Plan in Mitigation Measure PALEO-3. SDG&E and/or its contractor shall retain documentation demonstrating that all construction personnel attended the training prior to the start of work on the site, and shall provide the documentation to the CPUC Project Manager upon request.</p>	SDG&E and its contractors to provide documentation demonstrating all construction personnel attended the training and schedule and document additional trainings for new construction personnel.	SDG&E qualified paleontologist to confirm compliance and provide specified documentation to CPUC PM. CPUC PM to review and confirm documentation.	Prior to any ground disturbing activities and/or when new construction personnel start work
	<p>Mitigation Measure PALEO-3: Paleontological Monitoring. The qualified paleontologist shall prepare, and SDG&E and/or its contractors shall implement, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). SDG&E shall submit the plan to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction. This plan shall address specifics of monitoring and mitigation and comply with the recommendations of the SVP (2010), as follows.</p> <ul style="list-style-type: none"> The qualified paleontologist shall identify, and SDG&E or its contractor(s) shall retain, qualified paleontological resource monitors (qualified monitors) meeting the SVP standards (2010). The qualified paleontologist and/or the qualified monitors under the direction of the qualified paleontologist shall conduct full-time paleontological resources monitoring for all ground-disturbing activities in previously undisturbed sediments in the Project site that have high paleontological sensitivity. This includes any depth of excavation into the Santiago Formation, as well as excavations that exceed 10 feet in depth in areas mapped as young alluvial floodplain deposits that overlie the Santiago Formation. The PRMMP shall clearly map these portions of the Project based on final design provided by SDG&E and/or its contractor(s). If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location will need to be individually monitored. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to evaluate and recover the fossil specimens, establishing a 50-foot buffer. If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location and regardless of whether the site is being monitored, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. The qualified paleontologist shall determine the significance of any fossils discovered, and shall determine the appropriate treatment for significant fossils in accordance with the SVP standards. The qualified paleontologist shall inform SDG&E of these determinations as soon as practicable. See Mitigation Measure PALEO-4 regarding significant fossil treatment. 	Qualified paleontologist prepares PRMMP. SDG&E and its contractors to implement the PRMMP and all recommendations included in the measure.	SDG&E qualified paleontologist to provide PRMMP to CPUC PM at least 30 days prior to construction. SDG&E qualified paleontologist to confirm compliance and provide other specified documentation to CPUC PM at least. CPUC PM to review and confirm documentation.	At least 30 days prior to construction for PRMMP. Other documentation submitted and reviewed during construction, as necessary

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Geology, Soils, Seismicity, and Paleontological Resources (cont.)				
Paleontological Resources (cont.)	<p>Mitigation Measure PALEO-3 (cont.)</p> <ul style="list-style-type: none"> Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort and any curation of fossils. SDG&E shall provide the daily logs to the CPUC Project Manager upon request, and shall provide the final report to the CPUC Project Manager upon completion. 			
	<p>Mitigation Measure PALEO-4: Significant Fossil Treatment. If any find is deemed significant, as defined in the SVP standards (2010) and following the process outlined in Mitigation Measure PALEO-3, the qualified paleontologist shall salvage and prepare the fossil for permanent curation with a certified repository with retrievable storage following the SVP standards.</p>	SDG&E, its contractors, and qualified paleontologist to prepare and salvage any fossils deemed significant and following SVP standards.	CPUC mitigation monitor to inspect and confirm compliance with SVP standards and MM PALEO-3 if fossil is deemed significant.	During construction, operation, and maintenance of the Project
Greenhouse Gas Emissions				
	No mitigation required.			
Hazards and Hazardous Materials				
Construction Hazards	<p>APM HAZ-1: A Health and Safety Plan will be prepared and implemented during construction. The Health and Safety Plan will describe the anticipated hazards that construction workers may encounter while working on the Project, the safety measures that must be taken to address those hazards, and the necessary training requirements for personnel working on the Project. Safety hazards and applicable federal and state occupational standards will be identified in conjunction with the development of appropriate response actions, as well as a protocol for accident reporting. The Health and Safety Plan will also identify security and safety requirements for staging areas, storage yards, excavation areas, and any other areas of the Project where hazards may exist during construction activities. In addition, information regarding medical kits, safety equipment, and evacuation procedures will be outlined in the Health and Safety Plan. A qualified safety field representative will be present on site to observe and document adherence to the Health and Safety Plan as needed. The Health and Safety Plan will be prepared by the SDG&E construction contractor and will be available immediately prior to construction.</p>	SDG&E and its contractors to prepare and implement Health and Safety Plan described in the measure.	SDG&E safety field representative to provide specified documentation to CPUC mitigation monitor to confirm compliance.	Prior to and during construction
	APMs TRA-1 and TRA-2 , described below.			

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Hazards and Hazardous Materials (cont.)				
Soil Excavation and Dewatering	Mitigation Measure HAZ-1: Soil and Dewatering Management Plan. SDG&E and the contractor conducting soil excavation and (if needed) dewatering shall develop and implement a Soil and Dewatering Management Plan (SDMP) that describes the procedures for managing excavated soil and groundwater generated from dewatering activities. The SDMP shall include procedures for monitoring soil for possible contamination, identifying the specific stockpiling locations and measures to contain the stockpiled soil to prevent run on and run off, and materials disposal specifying how the construction contractor(s) will remove, handle, transport, and dispose of all excavated materials in a safe, appropriate, and lawful manner. The SDMP shall specify the contractor will segregate and dispose of soil with chemical concentrations above regulatory standards. Soil with chemical concentrations below regulatory standards may be reused or recycled. Soil with chemical concentrations above regulatory standards shall be disposed of in accordance with the applicable provisions of Cal. Code Regs. Title 22, Chapter 11, Article 3, Section 66261 (i.e., Class III (non-hazardous waste), Class II (non-hazardous and "designated" waste), or Class I (non-hazardous and hazardous waste)). The SDMP must identify protocols for soil testing and disposal, identify the approved disposal sites, and include written documentation that the disposal site can accept the waste. The contractor shall include procedures for the safe and legal disposal of groundwater generated from dewatering, if any. The procedures shall include water sampling and testing procedures to quantify chemical concentrations in the water, and dispose of the water in a safe and legal manner. Note that the disposal of groundwater generated from dewatering may be disposed of under the State's VOC and Fuel General Permit, depending on chemical concentrations and local sanitary sewer acceptance criteria. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in soil and groundwater. This SDMP shall be submitted to CPUC for review and approval prior to commencement of construction.	SDG&E and its contractors to develop and implement a Soil and Dewatering Management Plan as described in measure.	CPUC mitigation monitor to review, approve, and confirm the implementation of the Soil and Dewatering Management Plan.	Prior to and during construction
Hydrology and Water Quality				
Violate Water Quality Standards	Mitigation Measure HAZ-1: Soil and Dewatering Management Plan , described above.			
Land Use and Planning				
	No mitigation required.			
Mineral Resources				
	No mitigation required.			
Noise				
Construction Noise	APM NOI-1: Construction activities will occur during the times established by the local ordinances, with the exception of certain activities where nighttime and weekend construction activities are necessary, including, but not limited to, construction work timeframes mandated by permit, pouring of foundations, and pulling of the conductor, which require continuous operation or must be conducted during off-peak hours per agency requirements. SDG&E will meet and confer with the applicable jurisdiction to discuss temporarily deviating from the requirements of the noise ordinance, as described in the noise variance process.	SDG&E and its contractors to meet and confer with the affected jurisdictions of potential deviations from noise ordinance requirements.	CPUC mitigation monitor to inspect and confirm compliance.	During construction activities

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Noise (cont.)				
Construction Noise (cont.)	APM NOI-2: SDG&E will provide notice of the construction plans to all property owners within 300 feet of the Project by mail at least one week prior to the start of construction activities. The announcement will state the anticipated construction start window, anticipated completion window, and hours of operation, as well as provide a telephone contact number for receiving questions or complaints during construction. SDG&E will maintain functional mufflers and/or silencers on all equipment to minimize noise levels as well as evaluate the potential use of portable noise barriers.	SDG&E and its contractors to provide noticing of construction plans to all property owners within 300 feet of the Project as described in the measure. SDG&E and its contractors to implement mufflers and silencers on all equipment.	CPUC mitigation monitor to confirm compliance of sufficient noticing and use of mufflers and silencers for construction equipment.	One week prior to construction activities and during construction
	<p>Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan. To reduce noise impacts due to Project construction near sensitive receptors, SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval. The Plan shall include a requirement for SDG&E to administer a noise monitoring program when construction activities are conducted within 100 feet of sensitive receptor locations to ensure that the provisions of the Plan, including those identified below, are effective in reducing construction noise levels at sensitive receptor locations to 75 dBA L_{eq} or less. The Plan shall present specific measures that identify how the construction noise limit of 75 dBA as an hourly L_{eq} at nearby sensitive receptor locations will be adhered to, how potential exceedances will be documented and corrected, and how impacts on sensitive receptors from exceedances that cannot be corrected or avoided will be mitigated, including but not limited to the following measures:</p> <p>Noise Reduction</p> <p>The following measures shall apply to construction activities within 100 feet of sensitive receptor locations:</p> <ul style="list-style-type: none"> Impact tools (e.g., jack hammers, pavement breakers, and rock drills) shall be hydraulically or electrically powered where feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dB. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dB. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible. 	SDG&E and its contractors to develop and implement a Construction Noise Reduction and Mitigation Plan as described in the measure and conduct a noise monitoring program during construction activities within 100 feet of sensitive receptors.	CPUC PM to review and approve noise monitoring program and Construction Noise Reduction Mitigation Plan. CPUC mitigation monitor to inspect and confirm implementation of plan elements.	14 days prior to construction activities and during construction

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)				
Construction Noise (cont.)	<p>Mitigation Measure NOI-1 (cont.)</p> <ul style="list-style-type: none"> When construction activities that could potentially exceed 75 dBA are conducted, construction equipment and trucks shall be equipped with enhanced noise control measures (where feasible and reasonably available). Enhanced noise control measures shall be identified in the Plan and could include, but are not limited to, improved exhaust mufflers and intake silencers, engine enclosures, noise shields or shrouds, etc. When construction activities that could potentially exceed 75 dBA are conducted, noise barriers such as noise shields, barriers, blankets, or enclosures shall be used, where feasible, adjacent to or around noisy construction equipment. Noise control shields/barriers/blankets shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise shield/barrier/blanket. The noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source. Stationary construction noise sources shall be located as far from adjacent receptors as possible. They shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent this does not interfere with construction. <p>Notification and Correction</p> <ul style="list-style-type: none"> Distribute to the potentially affected residences within 100 feet of Project construction an informational pamphlet, and post signs at conspicuous publicly accessible places at each construction site, that indicate the hours of construction work and applicable noise level limits and provide a "hotline" telephone number, which shall be attended during active construction working hours and record messages outside of working hours, for use by the public to register complaints. SDG&E shall identify whether posted hours and/or the 75 dBA L_{eq} threshold have been exceeded, take action to keep to posted hours and/or reduce noise levels below 75 dBA, and notify CPUC within 24 hours. With regard to any noise complaints received citing project construction, SDG&E shall ensure that all complaints received during or outside of working hours shall be logged noting date, time, complainant's name, nature of complaint, and any corrective action taken, and shall submit such information to the CPUC Project Manager within 48 hours of receiving the complaint. For construction activities that involve a helicopter (e.g., sock line installation, movement of materials), at least one week prior to the start of such activity, additional notice shall be issued or delivered [by a means which provides proof of delivery] by SDG&E and/or its contractor to sensitive receptors within 300 feet of planned helicopter activity. This notice shall include the estimated date and time of the proposed work, as well as the estimated duration of the work, both in terms of overall duration per segment and duration per pole location. <p>Relocation</p> <ul style="list-style-type: none"> The Plan shall provide for temporary relocation of residents in the event that the Plan or the noise monitoring program identifies the potential for construction noise to exceed 75 dBA L_{eq} within 100 feet of such receptors. 			

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Noise (cont.)				
Blasting	<p>Mitigation Measure NOI-2: Blasting Plan. Prior to conducting any blasting activities, SDG&E shall develop a Blasting Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor. The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval to ensure that all components of this measure have been included and all required reviews, signatures, and permits obtained. The plan shall include a current/valid copy of the Explosives Permit issued by the San Diego County Sheriff's Office, as well as documentation that all local blasting requirements have been adhered to. The Blasting Plan shall include at a minimum the following measures:</p> <ul style="list-style-type: none"> • Methods of matting or covering of blast area to prevent excessive air blast pressure. • Description of air blast monitoring program. • If necessary, SDG&E and/or its contractors shall use portable noise barriers between the source and affected occupied properties to reduce excessive noise impacts. • Blasting shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. daily. • Blasting notification procedures, lead times, and list of those notified. Public notification to potentially affected sensitive receptors describing the expected extent and duration of the blasting. • Verification that explosives are not being proposed for use within 300 feet of the boundary of any occupied parcels zoned for residential. In the event that blasting activities are proposed within this distance, SDG&E will provide verification to the CPUC that residences affected by noise are notified of the date and time of blasting and offered temporary relocation assistance. 	SDG&E and its contractors to develop and implement a Blasting Plan as described in the measure.	CPUC PM to review and approve Blasting Plan. CPUC mitigation monitor to inspect and confirm compliance.	14 days prior to construction activities or blasting activities
Vibration	<p>Mitigation Measure NOI-3: Vibration Reduction Plan. Prior to any blasting construction, the applicant shall develop a Vibration Reduction Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor, and submit the Plan to the CPUC for approval at least 14 days prior to any proposed blasting. The Vibration Reduction Plan shall include vibration reduction measures to ensure that surrounding buildings will be exposed to less than 0.2 PPV to prevent building damage. At a minimum, the plan shall consider the following measures:</p> <ul style="list-style-type: none"> • Evidence of licensing, experience, and qualifications of blasting contractors. • The Plan shall establish a vibration limit of 0.2 PPV at nearby structures in order to protect structures from blasting activities and identify specific locations for monitoring. A pre-blast survey shall be conducted of any potentially affected structures. • The Plan shall identify the appropriate size of the explosive charge to ensure that a vibration level of 0.2 PPV is not exceeded at nearby structures. • Impacted property owners shall be notified at least 48 hours prior to the visual inspections. • Post-construction inspection of structures shall be performed to identify (and repair if necessary) any damage from blasting vibrations. Any damage shall be documented by photograph, video, etc. This documentation shall be reviewed with the individual property owners and SDG&E shall arrange and fund any needed repairs. Documentation of these efforts shall be provided to the CPUC. 	SDG&E and its contractors to develop and implement a Vibration Reduction Plan as described in the measure.	CPUC PM to review and approve Vibration Reduction Plan. CPUC mitigation monitor to inspect and confirm compliance.	14 days prior to any blasting activities or blasting activities

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Population and Housing				
	No mitigation required.			
Public Services				
Fire Hazards	Mitigation Measure WIL-1: Fire Safety , described in <i>Wildfire</i> below.	SDG&E and its contractors to develop and implement a Final Project-specific CFPP as outlined in the measure. SDG&E and its contractors to document and report any ignition from project construction activities to local fire departments and suppress all project-caused ignition.	CPUC PM to review and approve the Final CFPP and confirm consultation with local fire authorities. CPUC mitigation monitor to inspect and confirm proper implementation of CFPP.	60 days prior to construction activities
Recreation				
Temporary Recreation Effects	APM PS-1: SDG&E will provide the public with advance notification of construction activities. Concerns related to dust, noise, and access restrictions with construction activities will be addressed within this notification.	SDG&E and its contractors to notify public notification of construction activities and potential concerns discussed in measure.	CPUC mitigation monitor to review public notification to confirm compliance.	Prior to and during construction
	APM PS-2: All construction activities will be coordinated with the property owner or authorized agent for each affected park, trail, or recreational facility prior to construction in these areas.	SDG&E and its contractors to coordinate with the property owner or authorized agent for each affected park, trail, or recreational facility.	CPUC mitigation monitor to inspect and confirm compliance and coordination.	Prior to construction
	APM PS-3: As needed, signs will be posted directing vehicles to alternative park access and parking, if available, in the event construction temporarily affects parking near trailheads.	SDG&E and its contractors to post signs directing the public to alternative park access, trailheads, or parking.	CPUC mitigation monitor to inspect and confirm compliance.	Prior to and during construction
	APM PS-4: All parks, trails, and recreational facilities that are physically impacted during construction activities and are not directly associated with the new permanent facilities, will be returned to an approximate pre-construction state, while still allowing for SDG&E to safely operate and maintain the facilities, following the completion of the Project. SDG&E will replace or repair any damaged or removed public equipment, facilities, and infrastructure in a timely manner.	SDG&E and its contractors to implement replacement or repair of any such facilities.	CPUC mitigation monitor to confirm restoration of damaged recreational facilities.	During and/or following construction
	No CPUC-recommend mitigation measures apply.			

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Transportation and Traffic				
Road Closures and Transit Services	APM TRA-1: If construction requires lane closures, traffic delays, or other encroachment of construction activities within public travelways, the Applicant will adhere to local traffic control regulations and establish a traffic control plan as needed to comply with local ordinances. Traffic control plans will describe signage, flaggers, or other controls to be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction.	SDG&E and its contractors to comply with local traffic control regulations and develop a traffic control plan.	CPUC mitigation monitor to confirm implementation of local traffic control regulations and traffic control plans.	Prior to and during construction activities
	APM TRA-2: The Applicant will coordinate with local emergency response agencies during construction within existing public roadways to allow safe passage and access by emergency vehicles and equipment.	SDG&E and its contractors to coordinate with local emergency response agencies.	CPUC mitigation monitor to confirm consultation with local emergency response agencies and that SDG&E and its contractors provide access for emergency vehicles and equipment.	Prior to and during construction activities
	Mitigation Measure TRA-1: Coordination with North County Transit District (NCTD). SDG&E and its contractor shall: <ul style="list-style-type: none"> Minimize interruptions to transit services and facilities. In the event that a temporary removal or relocation of a bus stop is necessary, coordination with NCTD shall occur to ensure that any such action is consistent with the transit operator's needs. The applicant shall coordinate with NCTD at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations. 	SDG&E and its contractors to coordinate with NCTD if temporary removal or relocation of a bus stop would occur.	CPUC mitigation monitor to confirm consultation with NCTD if temporary removal or relocation of a bus stop would occur.	30 days prior to construction activities in affected right-of-way
Tribal Cultural Resources				
Tribal Cultural Resources	Mitigation Measure CUL-1 through CUL-4, described in <i>Cultural Resources</i> , above.			

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Utilities and Service Systems				
Construction and Demolition Debris	<p>Mitigation Measure US-1: Construction and Demolition Debris Recycling Ordinances. SDG&E and its contractors shall recycle and/or reuse 90 percent of inert materials and 70 percent of all other materials, as well as 100 percent of trees, stumps, rocks, and other vegetation. In order to document and track such diversions, the applicant shall provide the following:</p> <ul style="list-style-type: none"> Prior to construction, the Applicant shall provide a preliminary Construction and Demolition Debris Register (Preliminary Debris Register) that lists all anticipated construction and demolition solid waste streams (by weight) along with how the project will dispose/divert each waste. The Preliminary Debris Register shall also list the anticipated destination(s) (i.e., location or facility) for each waste stream. The Preliminary Register shall document how the project shall achieve the minimum waste diversion percentages. During construction activities, the Applicant shall keep records (e.g., a log) on site documenting the disposal and/or diversion of all construction and demolition debris that leaves the project site. The Applicant shall also keep copies of all corresponding receipts or similar documentation from solid waste facility, recycling center, green waste facility, or other permitted facility. During construction activities, the Applicant shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports required by the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP). Following the completion of construction activities, the Applicant shall provide a Final Debris Register that documents the final construction and demolition debris totals, destinations, and diversion percentages. The Final Debris Register shall document the Project's final compliance with the minimum diversion percentages. 	<p>SDG&E and its contractors to develop a preliminary Construction and Demolition Debris Register as described in the measure.</p> <p>SDG&E and its contractors to keep records of disposal and diversion of all construction and demolition debris as outlined in the measure.</p>	<p>CPUC mitigation monitor to review Construction and Demolition Debris Register and all follow-on documentation of disposal and diversion of construction materials.</p>	<p>Prior, during, and following construction</p>
Wildfire				
Wildfire and Fire Hazards	<p>Mitigation Measure WIL-1: Fire Safety. SDG&E and/or its contractors shall prepare and implement a Final Project-specific Construction Fire Prevention Plan (CFPP) to ensure the health and safety of construction workers and the public from fire-related hazards. The Final Project-Specific Construction Fire Prevention Plan shall include the provisions in the TL 6975 Construction Fire Prevention Plan provided in Appendix 4.8-B of the Proponent's Environmental Assessment (SDG&E, 2017b), as well as the requirements listed below. Prior to construction, SDG&E shall contact and consult with the San Diego Unit of CAL FIRE, the San Diego County Fire Authority, and the fire departments of the cities of Carlsbad, Escondido, San Marcos, and Vista to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate prevention measures to be taken. SDG&E shall submit verification of its consultation with the appropriate fire departments to the CPUC Project Manager. SDG&E shall submit the CFPP to the CPUC Project Manager for approval 60 days prior to commencement of construction activities and shall make the approved Final CFPP available to all construction crew members prior to construction of the Project. The Final CFPP shall list fire safety measures including fire prevention and extinguishment procedures, as well as specific emergency response and evacuation measures that would be followed during emergency situations; examples are listed below. The Final CFPP also shall provide fire-related rules for smoking, storage and parking areas, usage of spark arrestors on construction equipment, and fire-suppression tools and equipment. The Final CFPP shall include or require, but not be limited to, the following:</p>	<p>SDG&E and its contractors to develop and implement a Final Project-specific CFPP as outlined in the measure.</p> <p>SDG&E and its contractors to document and report any ignition from project construction activities to local fire departments and suppress all project-caused ignition.</p>	<p>CPUC PM to review and approve the Final CFPP and confirm consultation with local fire authorities. CPUC mitigation monitor to inspect and confirm proper implementation of CFPP.</p>	<p>60 days prior to construction activities</p>

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
Wildfire				
Wildfire and Fire Hazards (cont.)	<p>Mitigation Measure WIL-1 (cont.)</p> <ul style="list-style-type: none"> • SDG&E and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available in the study area for fire protection. • All construction vehicles shall have fire suppression equipment. • SDG&E shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire. • As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires. • SDG&E shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site. • SDG&E and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by Project activities (such as welding or use of equipment that could create a spark). • At each construction site, after construction has been completed for the day, the project contractor and/or the SDG&E Contract Administrator will perform visual inspections to ensure that all ignition risks are minimized or eliminated before leaving the work site. • Successful implementation of Mitigation Measure WIL-1: Fire Safety would be demonstrated by the development of a Final CFPP in consultation with local fire authorities which documented and submitted to the CPUC for final approval. Additionally, successful implementation of Mitigation Measure WIL-1 would require that SDG&E and its contractor comply with all components of the Final CFPP, that ignition from project construction activities is promptly reported to the fire department(s) with jurisdiction, and that when it is safe to do so, any project-caused ignition is suppressed immediately. 			