Appendix C

Scoping Report

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Scoping Summary Report

Prepared for:

California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298

Prepared by:

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Contents

Scoping Summary					
Background and	l Purpose				
Proposed Projec	ct Scoping Process				
Comments Rece	ived2				
Comment Sumn	nary by Topic2				
CEQA Process	5				
Project Description					
Alternatives	4				
Environment	al Impacts5				
Aesthetics					
Air Quality					
Biological F	Resources5				
Cultural Resources					
Hazards					
Hydrology	and Water Quality7				
Land Use	8				
Noise					
Public Services9					
Recreation					
Cumulative	·9				
Permitting	10				
<u>Attachments</u>					
Attachment A	Comment Letters Received				
Attachment B Notice of Preparation and Newspaper Ads					
Attachment C	Attachment C Scoping Meeting Materials and Meeting Notes				

Scoping Summary

Background and Purpose

"Scoping" refers to the public outreach process used under the California Environmental Quality Act (CEQA) to determine the coverage and content of an environmental impact report (EIR). The scoping comment period offers an important opportunity for the public and agencies to review and comment during the early phases of the environmental compliance process. Scoping contributes to the selection of a range of alternatives to be considered in the EIR, and can also help to establish methods of analysis, identify the environmental effects that will be considered in detail, and develop mitigation measures to avoid or compensate for adverse effects. In some cases, it may also identify issues that the public feels do not warrant analysis.

This report describes the scoping process undertaken by California Public Utilities Commission (CPUC) staff for the Suncrest Dynamic Reactive Power Support Project (Proposed Project) proposed by NextEra Energy Transmission West, LLC (NEET West). It also summarizes agency and public comments received and identifies key issues for EIR analysis. All the comment letters received during the scoping report are reproduced in their entirety as attachments to this report. Personal identifying information of private citizen commenters has been redacted to protect their privacy.

Proposed Project Scoping Process

The scoping process is initiated when the lead agency issues a Notice of Preparation (NOP) announcing the beginning of the EIR process. The NOP for the Proposed Project was submitted to the State Clearinghouse, Office of Planning and Research and circulated to agencies and interested members of the public on January 5, 2016. The public review period lasted until February 8, 2016. As required by CEQA and the CEQA Guidelines, the NOP provided information on the background, goals, and objectives of the Proposed Project; announced preparation of, and requested public and agency comment on, the EIR; and provided information on the public scoping meeting to be held in support of the EIR. A copy of the NOP is included in the attachments (Attachment B) to this report.

On January 21, 2016, the CPUC conducted a public scoping meeting for the Proposed Project. The meeting was held from 6 pm to 8 pm at the Alpine Community Center located at 1830 Alpine Blvd. in Alpine, CA. The public meeting was publicized in local area newspapers and via direct mailings (i.e., through the NOP) to numerous households, offices, and agencies. Copies of the newspaper ads and the NOP are included in Attachment B. The mailing list for the NOP is not reproduced here out of consideration for the privacy of private citizens on the list.

The meeting format consisted of a presentation by CPUC and consultant staff followed by opportunities for attendees to ask questions and submit comments. Posters with basic information on the project were on display and CPUC and consultant staff were available before and after the meeting to answer questions and take comments. Written comment cards were provided to all meeting attendees, as well as information on how to access project documents and participate in the public review process going forward. Approximately 9 people attended the meeting in Alpine, including two members of the applicant (i.e., NEET West) team. Notes from the meeting are included in Attachment C.

Comments Received

In addition to the oral comments and questions provided at the scoping meeting (see meeting notes in Attachment C), CPUC received 10 scoping comment letters. Copies of all the comment letters received during the scoping period are included in Attachment A, and numbered according to the date received, with agency/utility letters first. The following public agencies and utilities submitted comments on the Proposed Project:

- State Water Resources Control Board (SWRCB) (Comment Letter #1)
- California Department of Fish and Wildlife (CDFW), South Coast Region (Comment Letter #2)
- County of San Diego, Planning and Development Services (Comment Letter #3)
- Office of Ratepayer Advocates (ORA), California Public Utilities Commission (Comment Letter #4)
- San Diego Gas & Electric Company (SDG&E) (Comment Letter #5)

The identities of the private citizens who submitted comments are not listed out of consideration for their privacy. The key concerns and comments contained in the scoping letters and expressed at the scoping meeting are summarized and categorized in the following section.

Comment Summary by Topic

To inform the environmental analysis and assist in the preparation of the EIR, the individual comments and concerns received during the scoping period were categorized as follows:

- **CEQA Process**: Comments related to the formal environmental review process as outlined by CEQA and CEQA Guidelines, such as the length of the public review period.
- **Project Description**: Comments related to specific aspects of the Proposed Project, such as Project design, schedule, or cost.

- Alternatives: Comments related to potential alternatives to the Proposed Project, such as siting the facility at a different location or using alternative technologies or methods.
- *Environmental Impacts*: Comments related to possible impacts on the physical environment, such as noise impacts during Project construction or operation, or possible effects on biological resources from Project components.
- *Permitting*: Comments related to project permitting, such as information on required permits should the Proposed Project be approved.

Project scoping comments are organized into these categories and listed below. Where applicable, the public entity who submitted the comment is indicated in parentheses. Note: comments are summarized; see the full comment letters in Attachment A and the meeting notes in Attachment C for the full comments and additional detail.

CEQA Process

- Is this going to be a "fast-tracked" EIR? This has happened in the past.
- Are there time limits for submittal of comments?
- Where can we see the EIR?

Project Description

- List all permits that may be required for the Proposed Project and identify the specific activities that may trigger these permitting actions. (SWRCB)
- Include a complete discussion of the purpose and need for, and description of, the Proposed Project, including all staging areas and access routes to the construction and staging areas. (CDFW)
- What is the need for this project? Is it really necessary?
- Does the project use cooling water? Would it take any water out of the ground?
- Why didn't you put the facility closer to the wind mills?
- How much power goes through the existing substation?
- Is there an underground component to the Static Var Compensator (SVC) facility? How far down will excavation go?
- This facility will connect with renewable generation in Imperial Valley? Does that mean more energy will be coming through Alpine?

- Will blasting occur?
- How will the proposed facility be used in conjunction with the existing substation?
- Who owns the land right now?
- Are they going to be using helicopters?
- How much energy is/will be coming in from Imperial Valley? Is there 1,700 megawatts of stranded renewable energy out there?
- Why don't they just hook into that line going down to Calexico?
- Include pictures or visual simulations showing what the proposed facility will look like.

Alternatives

- Describe and analyze all alternate locations for the SVC facility. (SWRCB)
- Evaluate the need for siting the Project in an active restoration area. (CDFW)
- Include a range of feasible alternatives that avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. (CDFW)
- Consider an alternative which would place the Project inside the existing Suncrest substation. (SWRCB, ORA) This alternative would have essentially no new environmental impacts. (SWRCB) This alternative also would be more effective in regulating voltage levels and more efficient from an operational/engineering perspective. (ORA)
- Describe whether locating the Proposed Project outside the existing Suncrest substation was based on the assumption that the California Independent System Operator and/or SDG&E would need to authorize or approve co-locating the Proposed Project within the existing substation. (ORA)
- See Public Utilities Code, Section 762, which grants CPUC the authority to order changes to the site of new structures, if it determines that such change(s) are in the public interest. Section 762 also grants the CPUC authority to require joint action between two or more public utilities. (ORA)
- Evaluate whether the existing substation would need to be expanded to accommodate inclusion of the Proposed Project within its current footprint. (ORA)
- Analyze an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest substation. This alternative is feasible, would meet all of the Project

objectives listed in the NOP, and would avoid or lessen the potentially significant impacts of the Proposed Project. (SDG&E)

Environmental Impacts

<u>Aesthetics</u>

• Consider potential impacts to views for residents in Japatul Valley.

Air Quality

• What will the Project's effect be on air emissions? What about ozone emissions?

Biological Resources

- Assume a fully restored habitat at the Wilson Laydown Yard restoration site when determining baseline biological conditions. (CDFW)
- Address potential impacts to Focused Conservation Areas pursuant to the East County Multiple Species Conservation Program (MSCP) Plan. (CDFW)
- Analyze potential effects of Project development on golden eagle, in particular from proposed blasting during construction, and explore feasible alternatives that avoid impacting or take of golden eagle. (CDFW)
- Include information on flora and fauna in the region, with special emphasis placed on resources that are rare or unique to the region. (CDFW)
- Include a thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. (CDFW)
- Include a current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. (CDFW)
- Include an inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. (CDFW)
- Discuss potential adverse impacts to biological resources from lighting, noise, human activity, exotic species, and altered drainage. (CDFW)
- Discuss indirect impacts on biological resources, including resources on nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands. (CDFW)
- Discuss how altered land uses from the Proposed Project could contribute to wildlifehuman interactions or conflicts. (CDFW)

- Include measures to fully avoid and otherwise protect Rare Natural Communities from Project impacts. (CDFW)
- Include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. (CDFW)
- For any proposed preservation and/or restoration, include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. (CDFW)
- Conduct vegetation clearing and construction activities outside of the peak avian breeding season, which generally runs from February 1 through September 1. If construction is necessary during the bird breeding season, conduct appropriate bird breeding surveys and implement appropriate buffers to avoid or minimize impacts. (CDFW)
- Do not use relocation, salvage, and/or transportation as mitigation for impacts to rare, threatened, or endangered species. (CDFW)
- Any plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques, and should follow the format described in CDFW's scoping letter (see Comment Letter #1 in Attachment A). (CDFW)
- Have you done any fieldwork yet?
- What type of mitigation are you going to implement for impacts to biological resources?
- For the EIR, will they do bio surveys at night or just during the day? A lot of animals only come out at night.

Cultural Resources

- Why didn't the PUC do a cultural study?
- What about impacts to artifacts from blasting?
- Is this new project going to sanitize/clear away Native American sites and artifacts like SDG&E did?

Hazards

• Evaluate potential fire danger from the proposed SVC facility. The oil filled transformers and capacitors can explode due to internal shorting, and the fire could spread during Santa Ana wind conditions.

- Consider mitigation of the fire danger associated with the Proposed Project by using a steel containment barrier around the facilities.
- Evaluate potential effects on human health from electric and magnetic field (EMF) radiation resulting from increases in power load transmitted through Alpine caused by the Proposed Project. The January 21st scoping meeting mentioned that the new facility would allow about a 20% power increase through Alpine. Measured EMF levels in Alpine currently appear to exceed levels that increase the risk of childhood leukemia (see Comment Letter #7 in Attachment A for attached EMF studies provided by the commenter).
- The amount of power which may be added to the Sunrise Powerlink (1,700 megawatts) will increase the EMF radiation exponentially, and potentially exacerbate existing human health impacts.
- Will the Project increase fire danger?
- What about radiation effects (e.g., leukemia) from increase energy going through Alpine?

Hydrology and Water Quality

- Refer to the basin plans when evaluating potential impacts to water quality and incorporate mitigation measures that are consistent with all applicable water quality standards, prohibitions, and provisions in the basin plans. (SWRCB)
- Include a regional-scale map identifying all surface water resources potentially affected by the Proposed Project. (SWRCB)
- Identify and list the beneficial uses of the identified potentially affected surface water resources and evaluate the Project's potential impacts to water quality with respect to these beneficial uses. (SWRCB)
- Include alternatives or list mitigation measures that avoid or minimize any identified impacts to water quality to a less-than-significant level. (SWRCB)
- Evaluate potential adverse effects on the hydrology and ecological functions of compensatory mitigation sites for the Suncrest Substation, in light of the fact that the mitigation sites were set aside in part to compensate for impacts to waters of the U.S. caused by the construction of the Sunrise Powerlink Project, including the Suncrest Substation. (SWRCB)
- Avoid where possible impacts to waters of the state, including waters of the U.S. Provide compensatory mitigation for any permanent unavoidable impacts to waters of the state or U.S. when avoidance and/or minimization is not possible. (SWRCB)

- Evaluate potential adverse effects on waters of the state or U.S. through alteration of watershed functions, such as from addition of a new, hardscape industrial facility to the area. (SWRCB)
- Include in the final Project design elements that treat stormwater as a resource to be managed for multiple benefits in accordance with the SWRCB's Revised Draft Strategy to Optimize Resource Management of Storm Water (Storm Water Strategy). (SWRCB)
- Include measures to re-configure the existing drainage system of Bell Bluff Truck Trail, as this road does not currently exhibit design features that would be consistent with the SWRCB's Storm Water Strategy. (SWRCB)
- Conduct a jurisdiction wetland delineation (JD) for the Proposed Project. A JD conducted for the Suncrest substation project identified multiple ephemeral drainages in the area. (CDFW)
- Discuss potential changes in drainage patterns on and downstream of the Project site that could occur from the Proposed Project, including changes in the volume, velocity, or frequency of flows, or addition of polluted runoff. (CDFW)
- When evaluating potential storm water quality-related impacts, consider postconstruction Best Management Practices (BMPs), Low Impact Development (LID), Source Control BMPs and hydromodification management plan (HMP) in accordance with the relevant San Diego Municipal Storm Water Permit (2007 MS4 Permit or 2013 MS4 Permit pending the time of project approval/construction). (County of San Diego)
- When evaluating potential storm water quality-related impacts, consider construction BMPs and associated plans for conformance with the County of San Diego's Grading Ordinance, Watershed Protection Ordinance, and State of California's Construction General Permit. (County of San Diego)
- Will the facility affect groundwater during construction or operation?

Land Use

- Evaluate impacts, and include a discussion related to the Project's conformance with the guidance provided in the East County MSCP Planning Agreement's Interim Review Process. (CDFW)
- Evaluate potential conflicts with the proposed community trail identified as Bell Bluff Trail in the Alpine Community Trails and Pathways Plan and Map, which is included in the San Diego County Trails Master Plan. (County of San Diego)

- Coordinate with Alpine Community Planning Group regarding any proposed trail accommodation through the site. (County of San Diego)
- Avoid conflicts with SDG&E's on-going, legally-binding mitigation obligations related to construction of the existing Suncrest substation. (SDG&E)

Noise

• Comply with San Diego County's Regulatory Section: Section 36.401 for construction and operation of the facilities with respect to noise. (County of San Diego)

Public Services

- Ensure the control house on the SVC site is constructed of non-combustible materials. (County of San Diego)
- Discuss how the applicant is to contract with a private industrial fire brigade to conduct operations on electrical-related fires within the facility. (County of San Diego)
- Ensure that the access gates to the facility are two feet wider than the access roads (i.e., gates are 22 feet wide) and that the gates are setback 30 feet from Bell Bluff Truck Trail. (County of San Diego)
- Ensure access roads are capable of supporting 75,000 pounds. (County of San Diego)
- Include in the project design a 10,000 gallon water storage tank, which is to be situated to the southwest of the northernmost access driveway and accessible by fire engines. (County of San Diego)
- Provide a minimum of 100 feet of defensible space around the facility, with the first 50 feet of space being devoid of any vegetation. (County of San Diego)
- Are you going to use contracted fire suppression services?

Recreation

Evaluate potential impacts on the proposed community trail identified as Bell Bluff
Trail in the adopted Alpine Community Trails and Pathways Plan and Map, included
in the San Diego County Trails Master Plan. (County of San Diego)

Cumulative

- Evaluate cumulative impacts on biological resources and consider past, present, and future projects in light of their impacts on similar plant communities and wildlife habitats. (CDFW)
- Will there be more lines connecting into the Suncrest Substation in the future?

• How many of these types of facilities are they putting in?

Permitting

- A Clean Water Act, section 402, subdivision (p) stormwater permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit, may be required for land disturbance associated with the Project. (SWRCB)
- The Project may require a Clean Water Act, section 401 water quality certification for impacts to waters of the U.S., or dredge and fill Waste Discharge Requirements for impacts to waters of the state, both of which would be issued by the applicable Regional Water Quality Control Board. (SWRCB)
- Notification pursuant to Fish and Game Code section 1600 et seq. is required for any impact that will divert or obstruct the natural flow, or change or use any material from the bed channel or bank of any river or stream (CDFW)
- If the Project will result in take of a threatened or endangered species under the California Endangered Species Act (CESA), and is not covered under an approved Natural Communities Conservation Plan, the Project proponent will need to obtain authorization, such as an incidental take permit (ITP), prior to implementing the Project. (CDFW)
- Storage of transformer oils as described in the NOP will require a ministerial Unified Program Facility Permit, issued by the County Department of Environmental Health. (County of San Diego)
- For storm water, the 2007 MS4 Permit (Order No. R9-2007-0001) and the County of San Diego SUSMP are currently in effect and may apply. The Project may also need to comply 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). (County of San Diego)

Attachment A

Comment Letters Received





State Water Resources Control Board

January 28, 2016

Rob Peterson, CPUC c/o Tom Engels
Horizon Water and Environment
180 Grand Avenue, Suite 1405
Oakland, CA 94612
robert.peterson@cpuc.ca.gov
suncrestproject@horizonh2o.com

Dear Mr. Peterson:

Division of Water Quality Scoping Comments for the Suncrest Dynamic Reactive Power Support Project (Project) Proposed by NextEra Energy Transmission West, LLC

Please accept these comments in response to the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the subject Project, prepared by the California Public Utilities Commission (CPUC) and received at the State Water Resources Control Board (State Water Board) Division of Water Quality (DWQ) on January 7, 2016.

Authority

Pursuant to The Guidelines for the Implementation of the California Environmental Quality Act (Cal. Code Regs., tit. 14, sec. 1500 et seq.; hereinafter *CEQA Guidelines* or *Guidelines*), in particular, California Code of Regulations (CCR), title 14, section 15096, responsible agencies must specify the scope and content of the environmental information germane to their statutory responsibilities. The State Water Resources Control Board (State Water Board) is a responsible agency. Staff of the State Water Board has reviewed the NOP and considered the

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR



proposed Project's potential impacts to water quality and the beneficial use of waters of the State.

We have identified a number of potentially significant impacts to water quality that must be evaluated in the environmental review. Without adequate mitigation; Project implementation could result in significant adverse impacts to water quality and hydrology; thereby adversely affecting beneficial uses of waters of the State. Staff

State Water Board Staff has reviewed the NOP for the Project in light of previous personal communication via e-mail and teleconference, and requests that the following comments be incorporated in the CPUC's environmental review process.

Role of the Regional Water Boards and Basin Plans

State law assigns responsibility for protection of water quality in the affected regions to the Regional Water Boards. Any discharges of waste that may affect water quality and, ultimately, the beneficial uses of waters of the state may be regulated by the State Water Resources Control Board and the Regional Water Quality Control Boards (collectively, the Water Boards).

All waters of the state are protected under California law. All surface waters and groundwater are waters of the State and include, but are not limited to, aquifers, drainages, streams, washes, ponds, pools, and wetlands. Surface water bodies may be permanent, intermittent, ephemeral or seasonal.

Additional protection is provided for waters of the United States under the federal Clean Water Act (CWA). The water quality control plans (basin plans) for the affected regions contain policies that the Water Boards use with other laws and regulations to protect water quality. The basin plans provide guidance regarding water quality and how the Water Boards may regulate activities that have the potential to affect water quality within the regions.

Water Board staff request that the final environmental document refer to the basin plans and incorporate mitigation measures that are consistent with all applicable water quality standards, prohibitions, and provisions in the basin plans.

Permitting

A number of activities associated with the Project may require permits issued by the State Water Board or the San Diego Regional Water Quality Control Board (RWQCB). These permitting requirements include, but are not necessarily limited to, those described below.

A Clean Water Act, section 402, subdivision (p) stormwater permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Stormwater Permit, may be required for land disturbance associated with the Project. The NPDES permit requires the development of a Stormwater Pollution Prevention Plan and implementation of best management practices (BMPs). Industrial activities may require an NPDES General Industrial Stormwater Permit, obtained from the State Water Board, or individual stormwater permit obtained from the RWQCB.

Streambed alteration and/or discharge of fill material to a surface water may require a

Clean Water Act (CWA), section 401 water quality certification (WQC) for impacts to waters of the U.S., or dredge and fill Waste Discharge Requirements (WDRs) for impacts to "non-federal" waters of the state, or both. These permits would be issued by the RWQCB.

Determinations of the jurisdictional extent of the waters of the U.S. are made by the United States Army Corps of Engineers. Projects that have the potential to impact surface waters will require the appropriate jurisdictional determinations.

These determinations are necessary to discern if the proposed surface water impacts will be regulated under section 401 of the CWA or through dredge and fill WDRs issued by the Water Boards.

Additionally, waste discharge requirements (WDRs) for the discharge of waste in excess of water quality objectives may be required pursuant to California Code of Regulations (CCR), title 27 requirements.

We request that the environmental document list the permits that may be required, as outlined above, and identify the specific activities that may trigger these permitting actions in the appropriate sections of the environmental document.

<u>Project proponents should continue to consult with the RWQCB to ensure that all regulatory obligations associated with all project alternatives are understood.</u>

Beneficial Use Analyses

The DEIR should include a regional-scale map identifying all surface water resources potentially affected by the Project. These water resources should be tabulated and organized by waterbody type and described in detail in the appropriate sections of the DEIR.

We request that the DEIR identify and list the beneficial uses of the identified surface water resources, as outlined in the San Diego Regional Water Quality Control Plan (Basin Plan), and evaluate the Project's potential impacts to water quality with respect to those beneficial uses.

The environmental document must include alternatives to avoid those impacts or list specific mitigation measures that, when implemented, minimize unavoidable impacts to a less than significant level.

Project-Specific Comments

- 1. We understand that the Project must be placed within a limited distance from the existing Suncrest Substation in order to meet engineering limits, but alternatives to the precise location and placement of the proposed Dynamic Reactive Power Support structures do exist. All of those alternate locations should be described and analyzed in the Draft EIR (DEIR).
- 2. Location of the Project within the existing footprint of the Suncrest Substation is technically feasible, and should be fully considered in the DEIR. This alternative would have essentially no new impacts on the environment.

- 3. As we have stated before, DWQ's interest in this project stems from its potential impacts to the recently established Suncrest compensatory mitigation site which surrounds the Suncrest Substation. This mitigation site was set aside to compensate, in part, for impacts to waters of the State, including waters of the U.S., that were caused by the construction of the Sunrise Powerlink Project which included the Suncrest Substation. Therefore analysis of any project alternatives that could adversely affect the compensatory mitigation site's hydrology or ecological functions must be included in the Draft EIR.
- 4. Alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through direct fill. In general, these types of impacts should be avoided whenever possible, and minimized when avoidance is not possible. When permanent unavoidable impacts would result from a project alternatives, these impacts should be clearly identified, and compensatory mitigation for any such permanent impacts should be provided in the mitigation measures for those alternatives.
- 5. Alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through alteration of watershed functions. Impacts from previous development in the area would be exacerbated by a new, hardscape industrial facility. These potential impacts should be fully described in the DEIR, and mitigations for those impacts should be presented.

Mitigation for these impacts should consider the approaches found in the Revised Draft Strategy to Optimize Resource Management of Storm Water (Storm Water Strategy), which can be accessed at:

http://www.waterboards.ca.gov/water issues/programs/stormwater/strategy initiative.shtml

The final Project should include design elements that treat stormwater as a resource to be managed for multiple benefits. State Water Board staff are available to assist CPUC and Project proponents in development of alternatives that better achieve the goals of the Storm Water Strategy.

6. As described in comment 5 above, alternatives that would locate the Project off site from the Suncrest Substation, as described in the NOP, have the potential to adversely affect waters of the state, including waters of the U.S. through alternation of watershed functions. Those alternatives could include construction that would significantly excavate and re-build the existing access road, the Bell Bluff Truck Trail.

This road, in its current form, does not exhibit design features that would be consistent with the goals of the Storm Water Strategy mentioned in comment 5. If such alternatives that entail substantial excavation and re-construction of the road are described, mitigation for the impacts to waters of the state, including waters of the U.S. should include measures to re-configure the existing drainage system of the road.

We note that runoff is currently diverted and concentrated in a series of concrete lined V-ditches. Alternatives that moderate the rate and concentration of discharge into the affected watershed area should be analyzed as part of the development of alternatives.

In Conclusion

State Water Board staff thanks the CPUC for the proactive outreach to the Water Boards in the development of the Project to date. We look forward to cooperating with the CPUC and the Project proponents in development of a Draft EIR that provides a full and accurate analysis of all potential project impacts to waters of the state.

Please continue to list me as the State Water Board staff contact for the proposed Project.

Cliff Harvey, Environmental Scientist Division of Water Quality, 401 Unit State Water Resources Control Board 1001 I Street, 15th Floor Sacramento, CA 95814 (916) 558-1709 clifford.harvey@waterboards.ca.gov

Sincerely,

Cliff Harvey

cc: Eric Becker, San Diego Regional Water Quality Control Board eric.becker@waterboards.ca.gov

Cliff Hamen

Chris Beegan, Division of Water Quality, Storm Water Planning Unit chris.beegan@waterboards.ca.gov

Shanti Santulli, U.S. Army Corps of Engineers – Los Angeles District shanti.a.santulli@usace.army.mil



State of California – Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE

WILDLIFE

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February 2, 2016

Mr. Robert Peterson, Project Manager
Infrastructure Permitting and CEQA, Energy Division
California Public Utilities Commission
505 Van Ness Ave.
San Francisco 94102
suncrestproject@horizonh20.com

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project, Unincorporated

San Diego County, San Diego County, California (SCH # 2016011004)

Dear Mr. Peterson:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Suncrest Dynamic Reactive Power Support Project Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program. The County of San Diego (County) participates in the NCCP program through a signed Planning Agreement for the East County Multiple Species Conservation Program (MSCP).

The Suncrest Dynamic Reactive Power Support Project (Project) is located in unincorporated south-central San Diego County, approximately 5.75 miles southeast of the community of Alpine, off of Bell Bluff Truck Trail Road. The lands surrounding the proposed Project are primarily undeveloped, with some rural-residential development to the east and south, and the existing Suncrest Substation at the Project's western terminus. The Project is located approximately 1.8 miles south of Interstate-8 and Japatul Valley Road (State Highway 79) is approximately 1.2 miles to the southeast. The Project would be located on private property within the administrative boundary of the Cleveland National Forest.

The Proposed Project includes two primary components: 1) a Static Var Compensator (SVC) facility, to be located approximately 1 mile east of the existing Suncrest Substation; and 2) a 230 kilovolt (kV) transmission line from the proposed SVC facility to the existing Suncrest substation.

The proposed SVC facility would produce and consume reactive power for voltage support and would interconnect with the Suncrest bus via the proposed transmission line. The facility would be approximately 6 acres in total size (with a fenced area of approximately 2.58 acres) and would be located on an area previously used as a construction staging and materials storage area during construction of the Suncrest Substation (completed in 2012).

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 2 of 9

The SVC facility would include various structures and electrical equipment, such as power transformers, power circuit breakers, control buildings, capacitors, and reactors, all of which would be installed on concrete foundations. The four power transformers within the proposed SVC facility would each require a maximum of approximately 10,000 to 12,000 gallons of oil. The tallest structures within the SVC would be the lightning shielding masts, which would be approximately 75-feet-tall.

In addition to the electrical equipment, the SVC facility would include the following components: signage and lighting; access driveway improvements; stormwater drainage system and detention basin; retaining wall; 7-foot-high chain link and barb wire security fencing; and transformer oil containment basins. A retaining wall would be installed on the east side of the SVC facility to minimize the potential for erosion and would be approximately 480 feet long and 15 feet tall at its highest point.

The proposed 230 kV transmission line would be approximately 1 mile in length and would connect the proposed SVC facility to the existing Suncrest Substation. The proposed transmission line would be installed primarily underground beneath Bell Bluff Truck Trail Road, with approximately 300 feet of the line transitioning aboveground via an 85- to 95-foot-tall riser pole connecting with the existing substation. The underground transmission line would be installed in polyvinyl chloride conduits within a concrete-encased duct bank system. The duct bank would be approximately 5 deep, and would be approximately 30 inches wide by 24 inches tall. The underground transmission line would include up to five underground splice vaults spaced roughly every 900 feet to facilitate installation of the underground cables and operation and maintenance of the transmission line. The majority of the underground transmission line would be installed within Bell Bluff Truck Trail; however, installation of the splice vaults may require temporary disturbance outside of the roadbed.

The 85- to 95-foot-tall riser pole, for transition of the transmission line to an overhead span and entry into the existing Suncrest Substation, would be installed north of Bell Bluff Truck Trail. The base of the riser pole would be approximately 7 feet in diameter and require an additional approximately 15 foot radius of permanent disturbance around the riser pole.

In total, the Project would impact 12.2 acres of land, 6.2 acres of temporary impacts and 6 acres of permanent impacts. Construction is projected to be completed within 10 months with a targeted operation period of June 2017.

The Department offers the following comments and recommendations to assist the California Public Utilities Commission (CPUC) in avoiding, minimizing, and adequately mitigating Project-related impacts to biological resources.

Specific Comments

Project Scope

 The Project is proposed to be constructed on an active habitat restoration site associated with the construction of the Sunrise Powerlink's Suncrest substation. Pursuant to the Sunrise Powerlink Project Final Environmental Impact Report (FEIR) Mitigation Measure B-1a, a minimum of 5 years of success monitoring (or until successful restoration is achieved) Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 3 of 9

is required for "...all areas temporarily impacted by construction, such as tower construction sites, laydown/staging areas, temporary access and spur roads..." and by Condition 2.52 and 3.12 for impacts addressed under Sunrise Powerlink's Streambed Alteration Agreement (1600-2009-0365-R5). Currently, the Suncrest substation restoration is in its 4th year (fall 2012) of restoration efforts. The Department recommends that the DEIR analyze the need for siting the Project in an active restoration area rather than within previously developed locations. When evaluating the significance of impacting a restoration site, it is prudent to base that analysis on what the required condition of the land would have been following successful restoration pursuant to the restoration plan (see mitigation measures referenced above). For any development proposals within restoration areas, a fully restored habitat should be assumed when determining the baseline biological conditions for the DEIR's analysis.

Draft East County Plan

2. A Planning Agreement for the East County Multiple Species Conservation Program (MSCP) Plan was executed between the County of San Diego, the Department, and the U.S. Fish and Wildlife Service (USFWS) on November 18, 2008 and subsequently amended in May 2014 (Planning Agreement). The Planning Agreement guides the planning and preparation of the MSCP plan including defining the parties' goals and commitments, defining the scope of the conservation planning areas, and establishing an interim review process intended to meet the preliminary conservation objectives and reserve assemblage. The assemblage of the regional reserve system (as defined per the NCCP/Habitat Conservation Plan process) has been an ongoing process for well over a decade in San Diego County, led by not only the state (Department/CA State Parks) and federal (USFWS/Bureau Land Management/U.S. Forest Service) contingency, but also through partnerships with the local governments that have elected to work towards and adopt multi-species planning documents.

While the CPUC is not a party to the East County MSCP Planning Agreement, the Project is located within a Focused Conservation Area, a reserve planning tool for developing the draft East County MSCP. At the core of this plan (and as it exists under adopted MSCP Subarea Plans) is the preservation of large blocks of contiguous habitat in exchange for the participating local jurisdictions receiving permitting authority to regulate loss of the covered species. The underlying expectation is that the preserve areas remain whole or, if affected by development, be made whole again by replacing the functions and values lost. In order to address these aforementioned concerns we encourage the CPUC to coordinate with the Department and the USFWS in identifying potential areas for habitat acquisition or develop opportunities for habitat restoration within eastern San Diego County, to offset direct impacts to environmentally sensitive lands from the Project. Additionally, the Department recommends that the DEIR include a discussion regarding the Project's conformance to the guidance provided in the Planning Agreement's Interim Review Process to ensure successful implementation of the Project and draft MSCP plan.

Jurisdictional Delineation

The Project is proposed to be built within the existing laydown yard of the Suncrest substation. As part of the permitting process associated with that project a jurisdictional Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 4 of 9

delineation (JD) identified multiple ephemeral drainages within the Department's jurisdiction. In order to document the current conditions, the Department recommends that a subsequent JD is performed for the Project. The Department recommends notification pursuant to Fish and Game Code section 1600 *et seq.* for any impact that will divert or obstruct the natural flow, or change or use any material from the bed, channel, or bank (which may include associated riparian resources) of any river, or stream (see comment 5 below).

Proposed Blasting

4. Multiple golden eagle (Aquila chrysaetos) territories are known within the Project vicinity. The NOP identifies "...hammering, cutting and localized low energy blasting" within the scope of potential Project related construction. The Department is concerned with the potential effects that the proposed blasting may have on golden eagle. As a fully protected species (Fish and Game Code § 3511), take (Fish and Game Code § 86) of Golden Eagle is prohibited in addition to protections already afforded by the federal Bald and Golden Eagle Protection Act (as amended, 16 U.S.C. § 668). The DEIR should analyze the potential effects of the Project development on golden eagle and explore feasible alternatives that avoid impacting or take of golden eagle.

General Comments

Streambeds and Riparian Habitats

5. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, Project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.

The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, or stream, or use material from a river, or stream. For any such activities, the Project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the lead agency's Environmental Impact Report for the Project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 5 of 9

identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹

Threatened, Endangered, and Candidate Species

- 6. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085, 2835). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, and is not covered under an approved NCCP, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c), and 2835). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 7. To enable the Department to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.
 - A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives to ensure that alternatives to the proposed Project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 6 of 9

Biological Resources within the Project's Area of Potential Effect

- To provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.
 - a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see http://www.dfg.ca.gov/habcon/plant/). The Department recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008²). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
 - c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.

² Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. <u>A Manual of California Vegetation, Second Edition</u>. California Native Plant Society Press, Sacramento.

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 7 of 9

- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
- b) Discussions regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c) The zoning of areas for development Projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

- 10. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from Project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
- 11. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 12. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 8 of 9

- 13. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the Project area would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary flagging, and remain in effect as long as construction is occurring or until the nest is no longer active. No Project construction shall occur within the flagged nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
- 14. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
- 15. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on this NOP. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858-467-4289) or eric.weiss@wildlife.ca.gov.

Sincerely,

Gail K. Sevrens

Environmental Program Manager

South Coast Region

ec: State Clearinghouse, Sacramento

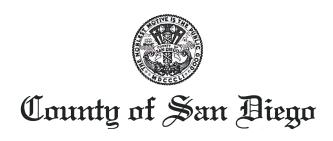
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad

Mr. Robert Peterson, Project Manager California Public Utilities Commission Mr. Charles Baker February 2, 2016 Page 9 of 9

Literature Cited:

Community Conservation Program Plans and Habitat Conservation Plans. NCCP Planning Agreement No. 2810-2007-00205_October 29, 2008.

County of San Diego, 2013. North and East County MSCP Planning Agreement and related amendment. PA# 2810-2007-00205. Amendment to County of San Diego, the California Department of Fish and Wildlife and the United States Fish, and Wildlife Service Regarding the North and East County Multiple Species Conservation Program Plans: Natural Community Conservation Plans and Habitat Conservation Plans. November 15, 2013.



MARK WARDLAW DIRECTOR PHONE (858) 694-2962 FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
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DARREN GRETLER ASSISTANT DIRECTOR PHONE (858) 694-2962 FAX (858) 694-2555

February 8, 2016

Robert Peterson California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298

Via email to: suncrestproject@horizonh20.com

COMMENTS ON NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE SUNCREST DYNAMIC REACTIVE POWER SUPPORT PROJECT PROPOSED BY NEXTERA ENERGY TRANSMISSION WEST, LLC

Dear Mr. Peterson,

The County of San Diego (County) has received the California Public Utilities Commission's Notice of Preparation of an Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project (Project) and appreciates this opportunity to comment. County staff has completed their review and have the following comments regarding the Project:

Hazardous Materials

The Project is expected to require the storage of between 10,000 – 12,000 gallons of oil for the transformers. Typical transformer oils are hazardous substances under State law. This storage will require a ministerial Unified Program Facility Permit, issued by the County Department of Environmental Health. For questions related to this permit, please contact Wendy Martinez at 619-247-2008 or Wendy Martinez@sdcounty.ca.gov.

Watershed Protection

For storm water quality standards, the 2007 MS4 Permit (Order No. R9-2007-0001) and the County of San Diego SUSMP, dated August 1, 2012, are currently in effect and may apply. Please note that the Project may need to comply with the recently adopted San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100) if prior lawful approval is not established prior to the implementation of the BMP Design Manual and other development regulations related to the 2013 San Diego Municipal Storm Water Permit (Order No. R9-2013-0001). County staff will provide additional review comments during the draft EIR period.

Mr. Peterson February 8, 2016 Page 2 of 3

The Project may generate potential storm water quality impacts onto unincorporated County of San Diego lands; therefore, the Project may need to consider the following items:

- Post-construction Best Management Practices (BMPs), Low Impact Development (LID), Source Control BMPs and hydromodification management plan (HMP) in accordance with the relevant San Diego Municipal Storm Water Permit (2007 MS4 Permit or 2013 MS4 Permit pending the time of project approval/construction).
- Construction BMPs and associated plans for conformance with the County of San Diego' Grading Ordinance, Watershed Protection Ordinance and State of California's Construction General Permit.

Parks and Recreation

The adopted Alpine Community Trails and Pathways Plan and Map, included in the County Trails Master Plan (CTMP), identifies proposed community trail alignment #23 as the Bell Bluff Trail (see attachment A). The trail locations shown on the maps on the CTMP represent general corridors and do not represent exact trail alignment locations. The Department of Parks and Recreation recommends coordination with the Alpine Community Planning Group regarding any proposed trail accommodation through the site.

Noise

The Project should be designed to comply with the County's Regulatory Section: Section 36.401 for operation and construction of the facilities.

Fire

County Fire Services has completed a review of the Fire Protection Plan prepared by Dudek, dated December 2015 and has provided the following comments to the Project applicant:

- Page 1, Footnote 1: Please update the timeline for the completion of the dissolution of the SDRFPD to be by mid-2016.
- It is stated in the FPP that there will be a 2,500 sq. ft. Control House (Sec. 1.1.2.2). Please specify in the FPP that the Control House will be non-combustible construction.
- Sec. 3.1.1 *Emergency Response*, Page 37: Please revise that initial response will be from the SDCFA Descanso Fire Station, which is staffed with CAL FIRE firefighter / paramedics via Schedule A contract with the SDCFA.
- Sec. 3.1.1 *Emergency Response*, Page 38, second paragraph: Replace this entire paragraph with discussion that the next due in will be the SDCFA Pine Valley Fire Station, which is staffed with CAL FIRE firefighter / paramedics via Schedule A contract with the SDCFA.
- Sec. 3.1.1 *Emergency Response*, Page 38: Provide discussion on how the applicant is to contract with a private fire industrial brigade to conduct operations on electrical-related fires within the facility (similar to SDG&E's contract with Capstone).

Mr. Peterson February 8, 2016 Page 3 of 3

- Sec. 3.1.1 Emergency Response—Emergency Services: Revise this section to state that Mercy is the contract ambulance provider to this area. The Mercy ambulance is in the Alpine area during the day and at night is housed in the Descanso Fire Station.
- Sec. 3.2.1 Fire and Maintenance Access in FPP & Sec. 3.5 Fire Access in the Tech. Report: Revise the discussion regarding gates to state that they are to be two feet wider than the access roads (gates 22' wide) and that the gates are to be setback 30' from Bell Bluff Truck Trail.
- Sec. 3.2.1 Fire and Maintenance Access: Revise the discussion regarding access roads to state that they are to be capable of supporting 75,000 lbs.
- Sec. 3.3 Water. Second Paragraph: Replace the sentence that begins "If a water tank is built next to the SVC location..." with "A 10,000 gallon water storage tank will be situated to the southwest of the northernmost access driveway and accessible by fire engines".
- Sec. 3.7 Defensible Space and Vegetation Management of the FPP & Sec. 4.2 Fuels Management of the Tech Report: Clearly state that a minimum of 100' of defensible space will be provided around the facility, which will include the first 50' being devoid of any vegetation.
- Sec. 4.0 Mitigation Measures, Item 2: Reference to Appendix G should be replaced by Appendix F.
- Please provide a Project Facilities Availability Fire form with Section 1 completed and signed to our department for us to complete so that you may add it to Appendix C of the next revision of the FPP.

If you have any questions regarding these comments, please contact Danny Serrano, Land Use/Environmental Planner, at (858) 694-3680, or via email at Daniel.serrano@sdcounty.ca.gov.

Sincerely,

Senfor Joseph Farace, AICP Group Program Manager Advance Planning Division

Planning & Development Services

Attachment A: Bell Bluff Trail

Email cc:

Adam Wilson, Policy Advisor, Board of Supervisors, District 2

Conor McGee, CAO Staff Officer, LUEG

Eric Lardy, Land Use/Environmental Planning Manager, Planning & Development Services Ashlev Smith, Land Use/Environmental Planner, Planning & Development Services

Nick Alex, Planner, Department of Public Works

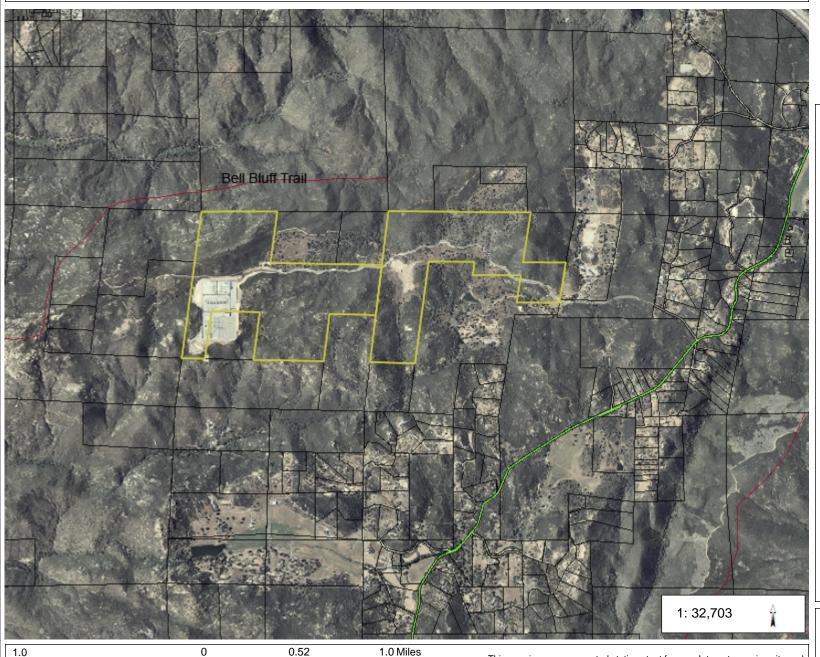
Mary Wells Bennett, Department of Environmental Health

Marcus Lubich, Park Project Manager, Department of Parks and Recreation

Comment Letter #3



Bell Bluff Trail





Legend

Parcels

Circulation Element

Expressway/Freeway

Prime Arterial

Major Roads Series

Boulevard Series

Community Collector Series

Light Collector Series

— Minor Collector Series

Local Public Roads

Trails

Regional Regional

___ Community Trail

Trail Easements

Notes

NAD_1983_StatePlane_California_VI_FIPS_0406_Feet Planning and Development Services

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

Comment Letter #4

ORA



Office of Ratepayer Advocates California Public Utilities Commission

> LINDA SERIZAWA Interim Director

505 Van Ness Avenue San Francisco, California 94102 Tel: 415-703-25250 Fax: 415-703-2057 http://ora.ca.gov

February 8, 2016

Rob Peterson, Project Manager Infrastructure Permitting and CEQA, Energy Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Comments on the Notice of Preparation of an Environmental Impact Report for the Suncrest Reactive Power Support Project, Proposed by NextEra Energy Transmission West, LLC; Application (A.) 15-08-027

Dear Mr. Peterson:

The Office of Ratepayer Advocates (ORA) hereby submits the following comments to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Suncrest Reactive Power Support Project (Project) proposed by NextEra Energy Transmission West, LLC (NextEra). ORA seeks to ensure that the EIR considers all the potential environmental impacts of the Project, including the difference between placing the Project outside the locational footprint of the Suncrest substation and inside the locational footprint. ORA believes that placing the Project inside the site of the Suncrest substation will prove the preferable alternative on environmental and other grounds, and requests that the Commission evaluate this among the alternatives considered.

Table 1 of the NOP identifies the summary of potential impacts and issues for the EIR and notes the following with respect to alternatives to the Project:

Alternatives.

• Concerns regarding inclusion, evaluation of a project alternative co-located within existing Suncrest substation site, (i.e. concerns that such an alternative wouldn't be evaluated in an MND, 1) which could have induced environmental impacts. 2

158377940

¹ Mitigated Negative Declaration, California Code of Regulations, Section 15070.

² Notice of Preparation of EIR, p. 3.

Rob Peterson February 8, 2016 Page 2

Locating the proposed Project within the site of the existing Suncrest substation mitigates significant impacts and should be studied even if the Commission decides to prepare an MND for the project. As well as being lead agency for California Environmental Quality Assessment (CEQA), the Commission is also the agency ultimately charged with determining if a project can be located within the site of the existing Suncrest substation³. Thus, ORA has requested that the scope of this proceeding include a determination of whether locating the proposed Project outside the existing Suncrest substation was based on the assumption that California Independent System Operator (CAISO) and/or San Diego Gas & Electric company (SDG&E) would need to authorize or approve co-locating the proposed Project within the Suncrest substation.⁴

Public Utilities Code, Section 762, in relevant part states:

Whenever the commission, after a hearing, finds that additions, extensions, repairs, or improvements to, or changes in, the existing plant, equipment, apparatus, facilities, or other physical property of any public utility or of any two or more public utilities ought reasonably to be made, or that new structures should be erected, to promote the security or convenience of its employees or the public, or in any other way to secure adequate service or facilities, the commission shall make and serve an order directing that such additions, extensions, repairs, improvements, or changes be made or such structures be erected in the manner and within the time specified in the order. If the commission orders the erection of a new structure, it may also fix the site thereof. If the order requires joint action by two or more public utilities, the commission shall so notify them and shall fix a reasonable time within which they may agree upon the portion or division of the cost which each shall bear.

If co-location of the proposed Project and the Suncrest substation is not studied in this EIR, and the Commission ultimately determines that the project should be located inside the substation site, then another EIR would likely ensue to study the co-location alternative.

Therefore, ORA recommends that the following issues be included in the scope of the EIR:

1. Whether the proposed Project should be co-located within the footprint of the existing Suncrest Substation.

³ See Public Utilities Code, Section 762 et. seq; see also Public Utils. Code, Section 851 et seq.

⁴ <u>Id.</u>; See also ORA's Response to NextEra's Application.

Rob Peterson February 8, 2016 Page 3

2. Whether the existing Suncrest substation needs to be expanded to accommodate inclusion of the proposed Project within its site or current footprint.

There is no need for the one mile 230 kV transmission line interconnecting the proposed Project and the existing Suncrest substation. Locating the Project within the footprint of the Suncrest substation would more effectively provide voltage support services to the Suncrest substation, operate more reliably and be easier to coordinate from an engineering standpoint. Co-locating the Project within the substation also costs less and might have less impact on the environment than building the Project outside the site of the substation.

Sincerely,

/s/ LINDA SERIZAWA Linda Serizawa Interim Director, Office of Ratepayer Advocates

Cc: Tom Engles, Horizontal Water and Environment, LLC Administrative Law Judge Todd Edmister Service List for A.15-08-027



Adrianna B. Kripke Senior Environmental Counsel

San Diego Gas & Electric Company 8330 Century Park Court, CP32C San Diego, CA 92123 Tel: 858-654-1536 akripke@semprautilities.com

February 8, 2016

SENT BY EMAIL

Rob Peterson, California Public Utilities Commission c/o Tom Engels, Horizon Water and Environment, LLC 180 Grand Avenue, Suite 1405 Oakland, CA 94612 <suncrestproject@horizonh2o.com>

Re: San Diego Gas & Electric Company's Comments on the Notice of Preparation of an Environmental Impact Report for the Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Dear Mr. Peterson:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Suncrest Dynamic Reactive Power Support Project (Proposed Project). San Diego Gas & Electric Company (SDG&E) agrees that the EIR should address the potentially significant impacts and issues listed in the NOP. SDG&E especially encourages the EIR's consideration of: (1) the Proposed Project's potential conflicts with SDG&E's ongoing, legally binding mitigation obligations for the Suncrest Substation; and (2) an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation.

I. The Proposed Project Should Not Conflict with SDG&E's Ongoing, Legally Binding Mitigation Obligations for the Suncrest Substation

The NOP's list of potentially significant impacts and issues includes "[i]mpacts on existing mitigation sites/conflicts with existing mitigation obligations related to the existing Suncrest Substation." SDG&E owns and operates the Suncrest Substation and will continue to honor these ongoing, legally binding mitigation obligations. SDG&E therefore requests that the Proposed Project not conflict with any of these obligations, which include restoring habitat on the site of the Proposed Project and transferring nearby land to the U.S. Forest Service for conservation purposes.

_

NOP at 2.

Rob Peterson, California Public Utilities Commission February 8, 2016 Page 2 of 4

II. SDG&E Requests Analysis of an Alternative that Locates an SDG&E-Owned Dynamic Reactive Device Within the Suncrest Substation

SDG&E requests that the EIR analyze an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation. This will help to meet the requirement in the California Environmental Quality Act (CEQA) Guidelines to analyze 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."²

A. The Alternative Is Feasible

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation meets the criteria for inclusion in the alternatives analysis. This alternative is feasible, which the CEQA Guidelines define as meaning "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

The NOP states:

The Proposed Project originates from the California Independent System Operator's (CAISO's) 2013-2014 transmission planning process, which identified a need for a 300-million volt-ampere reactive (megavar) dynamic reactive device at the existing Suncrest Substation's 230 kilovolt (kV) bus to meet California's 33% Renewable Portfolio Standard.⁴

SDG&E submitted a project sponsor bid to CAISO to locate an SDG&E-owned dynamic reactive device within the Suncrest Substation based on SDG&E's determination that doing so was feasible. While CAISO selected NextEra Energy Transmission West, LLC (NEET West) to be the project sponsor, CAISO emphasized in its selection report that it considered both NEET West and SDG&E "to be highly qualified to finance, construct, own, operate, and maintain" the device. CAISO's selection report therefore confirms SDG&E's determination that locating an SDG&E-owned device within the substation is feasible.

² Cal. Code Regs. tit. 14, § 15126.6(a).

³ *Id.* § 15364.

⁴ NOP at 4.

⁵ CAISO, Suncrest Reactive Power Project – Project Sponsor Selection Report at 1 (Jan. 6, 2015), *available at* https://www.caiso.com/Documents/SuncrestProjectSponsorSelectionReport.pdf.

Rob Peterson, California Public Utilities Commission February 8, 2016 Page 3 of 4

In the Proponent's Environmental Assessment for the Proposed Project, NEET West stated correctly that SDG&E will not agree to NEET West's construction of the dynamic reactive device within the Suncrest Substation. NEET West then stated that its construction of the device within the substation would be infeasible due to issues with site control and timing.

While these issues affect the feasibility of NEET West's construction of the dynamic reactive device within the Suncrest Substation, they do not affect the feasibility of locating an SDG&E-owned device within the substation. As discussed below, an alternative that locates an SDG&E-owned device within the substation could avoid or substantially lessen any significant environmental effects from the Proposed Project.

SDG&E requests that the EIR analyze this alternative regardless of the ultimate conclusions about site control and timing. This will ensure that the EIR provides a complete analysis under CEQA of the Proposed Project's environmental impacts.

B. The Alternative Meets the Project Objectives

The NOP lists the Proposed Project's objectives as follows:

- Meet the CAISO's identified need for reactive support at the Suncrest Substation's 230 kV bus;
- Improve and maintain the reliability of the transmission grid;
- Facilitate delivery of renewable energy generation from the Imperial Valley area to population centers to the west;
- Support achievement of the state's 33% Renewable Portfolio Standard.⁶

An alternative that locates an SDG&E-owned device within the substation meets all these objectives.

C. The Alternative Could Avoid or Substantially Lessen Any Significant Environmental Effects

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation could avoid or substantially lessen any of significant environmental effects from the Proposed Project.

The Proposed Project would construct: (1) a Static Var Compensator facility approximately one mile east of the Suncrest Substation; and (2) a new, approximately one-mile

⁶ NOP at 4.

Rob Peterson, California Public Utilities Commission February 8, 2016 Page 4 of 4

230 kV transmission line, which would connect the Static Var Compensator facility to the substation. The Static Var Compensator facility would have a total footprint of approximately six acres, located in an area previously used for staging and storage during construction of the substation. The transmission line would be installed primarily underground beneath Bell Bluff Truck Trail road. The last approximately 300 feet would transition above ground at an 85- to 95-foot riser pole that would connect via SDG&E-owned overhead conductors to the 230 kV bus at the substation.

An alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation would not require any construction outside the substation footprint and would require only a minimal amount of new transmission conductors within the substation. Using the existing substation footprint, as well as avoiding construction of an approximately one-mile transmission line, could avoid or substantially lessen the potentially significant impacts identified in the NOP. These potentially significant impacts are for biological resources, cultural resources, hydrology and water quality, land use, noise, and public services.

For these reasons, the alternative analysis should include an alternative that locates an SDG&E-owned dynamic reactive device within the Suncrest Substation. SDG&E looks forward to reviewing the alternatives analysis, as well as the analysis of potential conflicts with SDG&E's ongoing, legally binding mitigation obligations for the substation.

Thank you for considering these comments. Please contact me if you have any questions.

Sincerely,

Adrianna B. Kripke

Senior Environmental Counsel

San Diego Gas & Electric Company

adrianna B. Kripke

Wendy D. Johnson, Regulatory Business Manager, SDG&E

cc:

California Public Utilities Commission

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Scoping Comment Form

Name:
Group/Organization (optional):
Mailing Address:
Telephone Number (optional):
Email (optional):
SEND EIR revent INFO
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O Reference the EPA Clean water act in EIR
(1) send me a Coron of the
3) Please Ex Plain the need for one The
actual technical process used in
Jan ell
O GASEOUS EMISSIONS, OZONE FIC.
5) Fire Danger - FROM FACILITY Process
(6) EXISTING SUBSTATION FIR EFFECT
1) Need FOR Project?
8 More PONER THRU ALPINE +
/u Comea?
he heed more 1 NFO TO Prevent
Ponges.

Please use additional sheets if necessary.

Submit written comments (postmarked no later than February 8, 2016) to:

Mail: Rob Peterson, CPUC Project Manager

c/o Tom Engels

Horizon Water and Environment, LLC 180 Grand Avenue, Suite 1405

Oakland, CA 94612

Email: suncrestproject@horizonh2o.com

Questions? Please contact us or visit our website: http://www.cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html

February 1, 2016

Rob Peterson, CPUC % Tom Engels Horizon Water and Environment 180 Grand Avenue, Suite 1405 Oakland, CA 94612

Subject: Response to the Scoping Meeting on the Sun Crest Dynamic Reactive Power Support Project Meeting held in Alpine, CA January 21st 2016

The meeting discussed adding another facility next to the existing Transformer Facility near Bell Bluff in Alpine. Both the present facility and the proposed facility used oil filled transformers and possibly capacitors. Both facilities in my opinion create a serious fire danger. The oil filled transformers and capacitors can explode due to internal shorting. In a Santa Ana wind condition the fire can spread to adjacent transformers.

The combustion can attach and flame-hold to the downstream side of adjacent transformers which act as bluff body flame-holders and create a long conflagration, which can create in wind conditions a firestorm which could burn Alpine Viejas Casino, the town of Alpine and perhaps El Cajon, California.

However, the fire danger can be mitigated by installing a steel containment barrier around the facilities to contain the fire, allow for suppression installation, prevent ignition from stray bullets and errant vehicles. Advanced Engineering will provide preliminary design for the two barriers as a public service in return for some Powerlink information.

The January 21st meeting mentioned that the new facility would allow about 20% power increase through Alpine. Alpine has just recovered from the destruction caused by routing the Powerlink through its main street.

We are opposed to the increase of power levels through Alpine California because of the increase in EMF radiation levels associated with it, and the danger to children from leukemia. Measured EMF levels on Alpine, Blvd. appear to exceed the levels that increase the risk of childhood leukemia as reported in the references contained in the attached study. (Study of EMF Levels on Alpine Blvd., In Alpine California before and after Sunrise Powerlink Energization, January 21st, 2016).



January 21st 2016

Study of EMF Levels on Alpine Blvd. in Alpine, CA Before and After Sunrise Powerlink Energization

EMF measurements were taken along Alpine Blvd before and after the buried Powerlink cables were energized by Robie Faulkner and Michael Milligan of Alpine. Measurements were taken also inside an F150 truck on Alpine Blvd. at the same locations and on I8 E parallel to Alpine Blvd. The measurements taken inside the vehicle on Alpine Blvd. appear to be higher than measured on the roadside.

The reason the measurements were taken was to determine if levels may be harmful to health.

A synopsis of an Oxford University and Institute of Environmental Health in Stockholm Sweden studies are attached. The results of the study appear to indicate the risk of childhood leukemia increase with exposure to magnetic fields above .2 / .4 Micro Tesla.

It appears from the trend of the measurements taken and the information presented in the literature that children in Alpine may be at risk for leukemia.

We ask the Alpine Planning Group to ask the County of San Diego to examine the Alpine children for leukemia once a year as a precaution.



EMF measurements taken on Alpine Blvd with Lutron EMF Field Tester, Model EMF – 822A Measured in micro tesla for 30 sec.

	Date 3-11-12	06-24-12	01-25-16	01-26-16
Location, Alpine	Before Pwrlnk	RD.	RD.	*Vehicle
Star Vly Rd.	.01	.22	.27	.12
Cranors house (SVR	.02	.22	.01	. 9
Star Vly Rd. Mail Bo	x .1	.73	1.85 avg	.80
Alpine Blvd. Bridge	.3	.74	1.03 avg	.30
High School site	.6	.9	.155 avg	2.04
Albertsons	.2	1.7	1.01	1.75
Donatos	.2	.2	.36	1.06
4 Way Stop	.21	.38	.25	.18
Elementary School	.07	.27	.38 avg	.61
Tavern & Alpine Blv	vd .03	.4	.43	.40
Peutz Vly Rd.	.015	1	.47	2.12

Note: Average measurements. Taken at center and side of road and averaged.

Note: Measurements were taken on I8 E inside F150 Truck parallel Alpine Blvd. Readings measured .03 to .06 micro tesla except for Victoria Dr. underpass .13 and bridge underpass .2 micro tesla

^{*}Measurements taken in F150 Truck in West lane of Alpine Blvd.

Comment Letter #7

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What we do > Raising awareness > Our latest news

Press release: new power line study on link with childhood leukaemia

About childhood

07 February 2014

cancer

Press release: Overhead power line study does not overturn existing link with childhood leukaemia

Press release: embargoed until 00.01 hrs Friday 7th February 2014

Fundraising and events

What we do

Children with Cancer UK notes the publication of the Bunch et al paper in the British Journal of Cancer today [i] and its further exploration of the association between residential proximity to high voltage overhead power lines and childhood leukaemia risk.

For researchers

Researchers at the Childhood Cancer Research Group in Oxford extended their previous study of childhood leukaemia and proximity to power lines by including more recent data, cases and controls from Scotland, by

considering 132 kV power lines as well as 275 kV and 400 kV and by looking at greater distances from the power

About us

lines. Their report published today concludes that the risk declines after the 1980s.

In 2005, the 'Draper Study' [ii], published in the British Medical Journal reported an increased risk of leukaemia in

Donate

In 2005, the 'Draper Study' [ii], published in the British Medical Journal reported an increased risk of leukaemia is children born in England and Wales between 1962-1995 whose birth address fell within 600 metres of a high voltage power line.

Latest family update

Electric and magnetic fields (EMFs) are created by the presence of electricity. They are produced in varying degrees and strengths by all elements of the electricity supply system – from high-voltage power lines to domestic electrical appliances.



A doubling of the risk of childhood leukaemia with exposure to magnetic fields associated with the electricity supply above 0.3/0.4 microtesla is widely acknowledged. The robustness of this association has been re-affirmed in the recent EU SCENIHR draft Report [iii] and a new pooled analysis of international studies [iv].

Benji

Professor Denis Henshaw, Emeritus Professor of Human Radiation Effects at the University of Bristol and Scientific Advisor to Children with Cancer UK, said: "The report adds weight to the original 2005 findings that children living in proximity to power lines were, until after the 1980s, at increased risk of developing leukaemia.

Three-year-old Benji was waking up screaming with terrible leg pams. He was diagnosed with leukaemia. Although still undergoing treatment, he has started school and is loving it.

"We are clear that this report does not alter the widely acknowledged robust association of power frequency magnetic fields with childhood leukaemia risk. That the risk now appears to have diminished is intriguing and at present we can only speculate as to why this may be. This paper highlights the clear need for further research."

Related Topics

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(patient stories)

Around 3,600 youngsters, including children and babies, are diagnosed with cancer every year in the UK. Children with Cancer UK funds life-saving research into the causes, prevention and treatment of childhood cancer and works to protect young lives through essential welfare and campaigning programmes.

acute lymphoblastic leukaemia acute myeloid ieukaemia brain and spinal tumours brain tumour initiative cancer treatments childhood cancers corporate partners cycling

running

ENDS

Notes to editors

- For quotes or interviews and further information about the charity please contact Tina Price, PR Manager Email: tina@tinapriceconsultants.com Tel: 01258 861 221 Out of hours: 07966 239 092
- Where possible, please include the contact details for more information: www.childrenwithcancer.org.uk or 020 7404 0808.

Oxford Journals Medicine & Health American Jnl of Epidemiology Volume 138, Issue 7 Pp. 467-481

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Am. J. Epidemiol. (1993) 138 (7), 467-481.

Magnetic Fields and Cancer in Children Residing Near Swedish High-voltage Power Lines

Maria Feychting and Michael Alhbom

Author Affiliations

Reprint requests to Maria Feychting, Institute of Environmental Medicine, Karolinska Institutet, Doktorsringen 18, Box 60208, S-104 01 Stockholm, Sweden

Received December 28, 1992. Revision received June 10, 1993.

Abstract

A case-control study was conducted to test the hypothesis that exposure to magnetic fields of the type generated by high-voltage power lines increases cancer incidence in children. The study base consisted of everyone under age 16 years who had lived on a property located within 300 meters of any of the 220 and 400 kV power lines in Sweden during the period 1960-1985. Subjects were followed from their entry into the study base through 1985. A total of 142 cancer cases were identified through a record linkage to the Swedish Cancer Registry. There were 39 leukemia and 33 central nervous system tumor cases. A total of 558 controls were selected at random from the study base. Exposure was assessed by spot measurements and by calculations of the magnetic fields generated by the power lines, taking distance, line configuration, and load into account, Information about historical loads on the power lines was used to calculate the magnetic fields for the year closest in time to diagnosis. When historical calculations were used as exposure assessment for childhood leukemia with cutoff points at 0.1 and 0.2 microtesla (µT), the estimated relative risk increased over the two exposure levels and was estimated at 2.7 (95% confidence interval (CI) 1.0-6.3) for 0.2 µT and over; p for trend = 0.02. When the upper cutoff point was shifted to 0.3 μ T, the relative risk was 3.8 (95% Cl 1.4-9.3); p for trend = 0.005. These results persisted when adjustment for potential confounding factors was made. For central nervous system tumor, lymphoma, and all childhood cancers combined, there was no support for an association.

Keywords child electromagnetic fields leukemia neoplasms

© 1993 by The Johns Hopkins University School of Hygiene and Public Health

Articles citing this article

A Pooled Analysis of Extremely Low-Frequency Magnetic Fields and Childhood Brain Tumors An Hipsdamal (2019) 173 (7): 752-761

Abstract Full Text (HTML) Full Text (PDF)

Exposure assessment and other challenges in non-ionizing radiation studies of childhood leukaemia Polist Post Pometer (2018) 139 (2) 139 (4)

Abstract Full Text (HTML) Full Text (PDF)

Nighttime Exposure to Electromagnetic Fields and Childhood Leukemia: An Extended Pooled Analysis

Am 11 pelegood (2017) 166 (3) 263-263

From: Peterson, Robert
To: Tom Engels

Subject: public scoping comment Fwd: Suncrest Dynamic Reactive Power Support Project

Date: Monday, February 08, 2016 7:26:56 PM

Sent by Android.

----- Original Message -----

From:

Sent: Monday, February 8, 2016 06:34 PM

To: "Peterson, Robert" < Robert.Peterson@cpuc.ca.gov> Subject: Suncrest Dynamic Reactive Power Support Project

Rob Peterson, Public Utilities Commission Project Manager,

My name is I reside at I resid

There has been completed a measurement of the EMF (radiation) currently being generated by the Sunrise Power Link. The study shows the current emissions are at a level known in Europe to cause Leukemia in children.

The amount of power which is attempting to be added to the Sunrise Power Link (1,700 Mega Watts) will increase the EMF exponentially along Alpine Boulevard where the residents walk and children play as well as wait for the school bus. The current EMF is damaging to children at existing levels. When additional power for approximately 85,000 new all electric homes is added to the Sunrise Power Link what will be the benefit be to the community of Alpine?

The Sunrise Power Link was promised by SDG&E to keep All our power bills low in San Diego, However every rate payer in San Diego county received a power rate increase due to the NEW 4 tier system of billing, which the PUC allowed. Prior the this new tier system there was peak and off peak power usage. Each and every time SDG&E has made promises they have been empty. As a member of the PUC you represent the citizens of the county NOT SDG&E. Please oppose the new power increase to the Sunrise Power Link. The health of Alpines' next generation depends on you.

Thank You for your time

California Public Utilities Commission

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Scoping Comment Form

Name:				
Group/Organization (optional):	/			
Mailing Address:				
Telephone Number (optional):			ALLEN TO THE REAL PROPERTY OF THE PERSON OF	
Email (optional):				-
Comments/Issues:	oreposed 1	Synamic	Reactive	Power

Comments/Issues: the proposed Dynamic Reactive Power
Support System to be installed Along the Bull
Blass truck trail within the Cleveland National
forvest is in direct opesition to the health of
every resident of Alpine. the Add tion of
1,700 Mega writts of electrical power will increase
the EMF of the Sunrise Power link exponentially
1,700 nege watts does not sound Like Much when
glazed over by SDE 45 is well is contractor
Next Era Energy transmission west, Lic. However
that is power enough for 85,000 111 electric
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Place use additional sheets if neressary.

Submit written comments (postmarked no later than February 8, 2016) to:

Mail: Rob Peterson, CPUC Project Manager

c/o Tom Engels

Horizon Water and Environment, LLC

180 Grand Avenue, Suite 1405

Oakland, CA 94612

Questions? Please contact us or visit our website:

Ce Diaho - Tocal http://www.cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html

Email: suncrestproject@horizonh2o.com



February 9, 2016

Dianne Jacob Supervisor, Second District

Dear Dianne,

I don't know if you received this from the PUC but the PUC wants to grant permission to NextEra Energy Transmission West LLC the right to construct a Static Var Compensator and a mile of 230 Volt transmission line in the same area as the existing Suncrest Substation in Japatul Valley.

Nowhere in the notice of the preparation of the EIR is a picture or description of what's proposed to be constructed so I thought you might be interested in what it looks like since it's made to sound so benign.

The pictures I've enclosed are of a similar unite located in El Cajon at SDG&E's office, and as you will note it's not a small thing.

Those of us that live in Japatul Valley and already are forced to look at the Suncrest Substation (that was to be screened by now, see enclosed 2011 email) and don't want another piece of power transmission equipment built that will further impede our views and further decrease property values.

This proposed construction in no way benefits San Diego or San Diego County much less the residents of Japatul Valley.

If left unchecked in 20 years we will be looking at an electrical facility of a magnitude that will be unstoppable. Allowing Sempra Energy a foot in the door is like opening the floodgates to whatever they want to do, and you know as well as I the PUC will go along.

What is your position and your plan regarding the preparation of the EIR?



CC: Robert Peterson, CPUC, C/O Tom Engels, Horizon Water and Environment



Notice of Preparation

To:	Responsible and Trustee	Agencies	From:	California Public Utilities Commission
,	(Agency			(Agency)
			4)	505 Van Ness Avenue
	(Addres.	8)		(Address)
			6	San Francisco, CA 94102-3298
Subj		Power Support F		Impact Report for the Suncrest Proposed by NextEra Energy
envir agen statu and/	ronmental impact report (I cy as to the scope and con tory responsibilities in cor	EIR) for the project id tent of the environment anection with the propronmental documents	entified ental info posed pr	the lead agency and will prepare an below. We are requesting the views of your primation that is germane to your agency's oject. Your agency may need to use the EIR d by our agency when considering your
	project description, location rials. A copy of the initial			al effects are contained in the attached d.
	nuse of the time limits man not later than 30 days after			onse must be sent at the earliest possible date
Enge		vironment, 180 Gran	d Avenu	om or Robert Peterson, CPUC, C/O Tome, Suite 1405, Sacramento, CA 94612. Please gency.
Proj	ect Title:	Suncrest Dynamic R	Leactive	Power Support Project
Proj	ect Applicant, if any:	NextEra Energy Tra	nsmissio	on West, LLC
Date	: January 5, 2016	Si	ignature	Red Adam
		T	itle:	Project Manager, Energy Division, Infrastructure Permitting and CEQA
			elephonomail:	e: (844) 211-7510 suncrestproject@horizonh2o.com

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Notice of Preparation

of an

Environmental Impact Report

for the

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298 Contact: Tom Engels 916/790-8548





DIANNE, 4 YEARS WATTER & NO SIGN OF A TREE

Thank you however your response does not address my question, that is the EIR said the towers at the substation would blend in. If substation towers (the the parts that stick up above the transformers) were to blend in, you will note that's just not possible as the rise above the surrounding terrain(see my pictures). If your (Sempra) asking me to wait 30 to 50 years before the substation blends in with or is less visible assuming the trees continue to grow I will be dead.

If that's your premise it should have been disclosed to that effect in the EIR, why was it not?

The way I see it its a very clear statement that the "substation will blend in" what am I to do now that it doesn't?

Your welcom to come to my home and have a look for your self,, just give me a call

Sincerely, --- On Tue, 8/21/12, wrote: Subject: Status of visual screening at Suncrest Substation

Date: Tuesday, August 21, 2012, 7:19 PM

Hello

From:

To:

Cc:

Earlier this month you emailed CPUC regard screening of the Suncrest Substation as seen from your location on Japatula Valley Road.

I can report the following with regard to reducing visual impacts:

SDG&E has stained rock cut areas so they mimic and better blend with the natural landscape. Jute netting and hydroseeding have been applied where there is soil; shrubs, wildflowers, and grasses will take hold in these areas. On the manmade slope facing the valley, shrubs and other vegetation has been planted and are being irrigated. The retaining walls lower on this slope also have been stained. The chain link fence around the south side of the substation has had brown slats inserted into it to help obscure the lower elements of the substation.



From your vantage point, the most significant action will occur this fall. With cooler weather, 42 additional trees will be planted. These will be Coulter pine (Pinus coulteri) and Mondell or Afghan pine (Pinus eldarica). As they grow, they will provide a dense foliage and will establish a substantial visual screen. They will be irrigated and monitored for success. However, as with many trees, it will take time for them to grow. The Coulter pine is a relatively slow grower, at about a foot per year for its first 20 years. The Mondell or Afghan pine grows more rapidly, as much as 3 to 6 feet per year when young, up to about 30-40 feet. While a Coulter pine near Julian measures nearly 130 tall with a spread of 60 feet, a typical height at maturity is 80 feet. The Afghan/Mondell pine reaches 30-50 feet in height and will be planted under the power

lines

entering/exiting the substation. Many of the trees will be planted near the top of the slope, but a number will be scattered on the slope as well.

Information on the trees can be found on the internet. See, for example:

Coulter pine -- http://www.conifers.org/pi/Pinus_coulteri.php

Afghan pine -- http://aces.nmsu.edu/county/donaana/mastergardener/documents/afghan-pine.pdf

Coulter pine:

Photo of Coulter pines near Santa Ysabel, Ca.

Mondell or Afghan pine:



Attachment B

Notice of Preparation and Newspaper Ads

Notice of Preparation

To: <u>F</u>	Responsible and Trustee	Agencies	From:	California Public Utilities Commission
	(Agency	·)		(Agency)
				505 Van Ness Avenue
	(Address	s)	•	(Address)
			-	San Francisco, CA 94102-3298
Subje		e Power Support P		Impact Report for the Suncrest Proposed by NextEra Energy
enviro agency statuto and/or	onmental impact report (I y as to the scope and con ory responsibilities in cor	EIR) for the project id tent of the environmen enection with the propronmental documents	entified ental info oosed pro	the lead agency and will prepare an below. We are requesting the views of your ormation that is germane to your agency's oject. Your agency may need to use the EIR d by our agency when considering your
	roject description, locationals. A copy of the initial			al effects are contained in the attached d.
	se of the time limits man at later than 30 days after			onse must be sent at the earliest possible date
Engels		vironment, 180 Grand	d Avenu	om or Robert Peterson, CPUC, C/O Tom e, Suite 1405, Sacramento, CA 94612. Please gency.
Proje	ct Title:	Suncrest Dynamic R	eactive 1	Power Support Project
Proje	ct Applicant, if any:	NextEra Energy Tra	nsmissic	on West, LLC
Date:	January 5, 2016	Si	gnature:	Rel Action
		Ti	tle:	Project Manager, Energy Division, Infrastructure Permitting and CEQA
			elephone nail:	: (844) 211-7510 suncrestproject@horizonh2o.com

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Notice of Preparation

of an

Environmental Impact Report

for the

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102-3298 Contact: Tom Engels 916/790-8548

Introduction

Purpose of the NOP

The California Public Utilities Commission (CPUC) is the lead agency for preparation and review of an environmental impact report (EIR) for NextEra Energy Transmission West, LLC's (NEET West's or the Applicant's) proposed Suncrest Dynamic Reactive Power Support Project (Proposed Project). The Proposed Project would involve construction of a dynamic reactive power support facility and an approximately one-mile-long transmission line connecting to the existing Suncrest Substation in south-central San Diego County, near the community of Alpine.

This Notice of Preparation (NOP) presents general background information on the scoping process, the environmental issues to be addressed in the EIR, and the anticipated uses of the EIR. It also briefly describes the Proposed Project as currently envisioned. The project description is subject to refinement during the process of preparing the EIR, depending on, among other things, input received in comments responding to this NOP and revisions to the Proposed Project. The CPUC has prepared this NOP pursuant to Section 15082 of the State California Environmental Quality Act (CEQA) Guidelines.

Scope of the EIR

This EIR will evaluate potential environmental impacts of the Proposed Project. As the lead agency under CEQA, CPUC has determined that the Project may have a significant impact on the environment and has decided to prepare an EIR. Consistent with the basic purposes of CEQA (State CEQA Guidelines Section 15002[a]), the purposes of the EIR will be to:

- 1. Inform governmental decision makers and the public about the potential, significant environmental effects of the proposed activities;
- 2. Identify the ways that environmental damage can be avoided or significantly reduced;
- 3. Prevent significant, avoidable damage to the environment through the use of feasible alternatives or mitigation measures.

A preliminary environmental review for the Proposed Project indicated the possibility for several potentially significant impacts and issues, as described in Table 1.

Table 1: Summary of Possible Impacts and Issues

Resource Topic	Potentially Significant Impact/Issue
Biological Resources	Impacts to wetlands and/or jurisdictional waters
	Impacts to Hermes copper butterfly during Project
	construction
Cultural Resources	Impacts to buried archaeological resources during
	Project construction
Hydrology & Water Quality	Impacts to downstream water bodies from stormwater
	discharges during Project construction and operation
	Impacts to hydrology and water quality during Project
	construction
Land Use	Impacts on existing mitigation sites/conflicts with
	existing mitigation obligations related to the existing
	Suncrest Substation
Noise	Noise impacts during construction
Public Services	 Adverse impacts related to fire protection service
Alternatives	Concerns regarding inclusion/evaluation of a Project
	alternative co-located within existing Suncrest
	Substation site (i.e., concerns that such an alternative
	wouldn't be evaluated in an MND), which could have
	reduced environmental impacts

No significance determinations have been made regarding the possible impacts listed in Table 1. The analysis in the EIR ultimately will determine whether these impacts actually could occur, will determine their level of significance, and will propose feasible mitigation measures to reduce significant impacts. Thresholds for determining significant impacts will be based on applicable sections of the State CEQA Guidelines, regulatory agency standards, and the judgment of the CEQA lead agency, CPUC. In addition to the possible impacts identified in Table 1, the EIR will evaluate other potential impacts/resource topics, as described in Appendix G of the State CEQA Guidelines.

Public Involvement

The CPUC is soliciting the views of interested persons and agencies on the scope and content of the environmental information that is germane to the Proposed Project. A scoping meeting for the Proposed Project will be held as follows:

Thursday, January 21, 2016, 6 p.m. to 8 p.m. Alpine Community Center, Sage Room 1830 Alpine Blvd.
Alpine, CA 91901

The scoping meeting will feature a presentation on the Proposed Project and environmental review process and an opportunity for interested members of the public to submit oral or written comments.

Written comments may be submitted any time during the scoping period. All available documents pertaining to the Proposed Project can be located at the following website: http://cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html. Because of the time limits mandated by state law, your written comments on the scope and content of the EIR must be *received no later than February 8, 2016 at 5:00 p.m.* Please send written comments to the CPUC, to the attention of Rob Peterson, CPUC, c/o Tom Engels, Horizon Water and Environment, 180 Grand Avenue, Suite 1405, Oakland, CA 94612. Please include the name and phone number of the contact person for your agency, if applicable. CPUC will consider and incorporate scoping comments on the Proposed Project in preparation of the EIR as appropriate.

PROJECT DESCRIPTION

Background and Need

The Proposed Project originates from the California Independent System Operator's (CAISO's) 2013-2014 transmission planning process, which identified a need for a 300-million volt-ampere reactive (megavar)¹ dynamic reactive device at the existing Suncrest Substation's 230 kilovolt (kV) bus² to meet California's 33% Renewable Portfolio Standard (CAISO 2014). CAISO determined that the retirement of the San Onofre Nuclear Generating Station and projected increases in renewable generating capacity in the Imperial Valley would cause loading and voltage stability issues in the transmission system in the area of the existing Suncrest Substation. CAISO conducted a competitive bid solicitation process for the Suncrest dynamic reactive facility and selected NEET West to construct the Proposed Project.

Following its selection by CAISO in January 2015 as the approved project sponsor, NEET West submitted to CPUC a Proponent's Environmental Assessment (PEA) in August 2015, as part of its application (A.15-08-027) for a Certificate of Public Convenience and Necessity (CPCN), as specified in CPUC General Order (G.O.) 131-D.

Project Objectives

The objectives of the Proposed Project as defined by the Applicant are as follows:

- Meet the CAISO's identified need for reactive support¹ at the Suncrest Substation's 230 kV bus;
- Improve and maintain the reliability of the transmission grid;
- Facilitate delivery of renewable energy generation from the Imperial Valley area to population centers to the west;
- Support achievement of the state's 33% Renewable Portfolio Standard.

Suncrest Dynamic Reactive Power Support Project

¹ Volt-ampere reactive (var) is a unit by which reactive power is expressed in an alternating current (AC) electric power system. Reactive power exists in an AC circuit when the current and voltage are not in phase. In an electric transmission system, reactive power serves to support the voltage levels needed to maintain system reliability. Megavar means one million vars.

² A bus or busbar is a metallic strip or bar that conducts electricity within a substation or other electrical apparatus. Buses are often the connection points for incoming transmission lines into a substation.

Project Location

The Proposed Project is located in unincorporated south-central San Diego County, approximately 5.75 miles southeast of the community of Alpine, off of Bell Bluff Truck Trail road. Figure 1 shows the Project location. The lands surrounding the Proposed Project are primarily undeveloped, with some rural-residential development present to the east and south, and the existing Suncrest Substation at the Project's western terminus. The nearest residence is approximately 0.6 mile to the southeast. Interstate-8 is located approximately 1.8 miles to the north of the Project area and Japatul Valley Road (State Highway 79) is approximately 1.2 miles to the southeast. The Proposed Project would be located on private property within the administrative boundary of the Cleveland National Forest.

Proposed Project

The Proposed Project includes two primary components: (1) a Static Var Compensator (SVC) facility, to be located approximately one mile east of the existing Suncrest Substation, and (2) a 230 kV transmission line from the proposed SVC facility to the existing substation. Figure 2 illustrates the primary project components.

SVC Facility

The proposed SVC facility would produce and consume reactive power for voltage support and would interconnect with the Suncrest bus via the proposed transmission line. The facility would be approximately 6 acres in total size (with a fenced area of approximately 2.58 acres) and would be located on an area previously used as a construction staging and materials storage area during construction of the Suncrest Substation (completed in 2012).

The SVC facility would include various structures/pieces of electrical equipment, such as power transformers, power circuit breakers, control buildings, capacitors, and reactors, all of which would be installed on concrete foundations. The four power transformers within the proposed SVC facility would each require a maximum of approximately 10,000 to 12,000 gallons of oil. The tallest structures within the SVC would be the lightning shielding masts, which would be approximately 75-feet-tall.

In addition to the electrical equipment, the SVC facility would include the following components: signage and lighting; access driveway improvements; a stormwater drainage system and detention basin; a retaining wall; approximately 7-foot-high chain link and barb wire security fencing; and transformer oil containment basins. The retaining wall would be installed on the east side of the SVC facility to minimize the potential for erosion and would be approximately 480 feet long and 15 feet tall at its highest point.

Transmission Line

The proposed 230 kV transmission line would be approximately one mile in length and would connect the proposed SVC facility to the existing Suncrest Substation. The proposed

transmission line would be installed primarily underground beneath Bell Bluff Truck Trail road, with the last approximately 300 feet of the line transitioning aboveground via an 85-to 95-foot tall riser pole to connect with the existing substation.

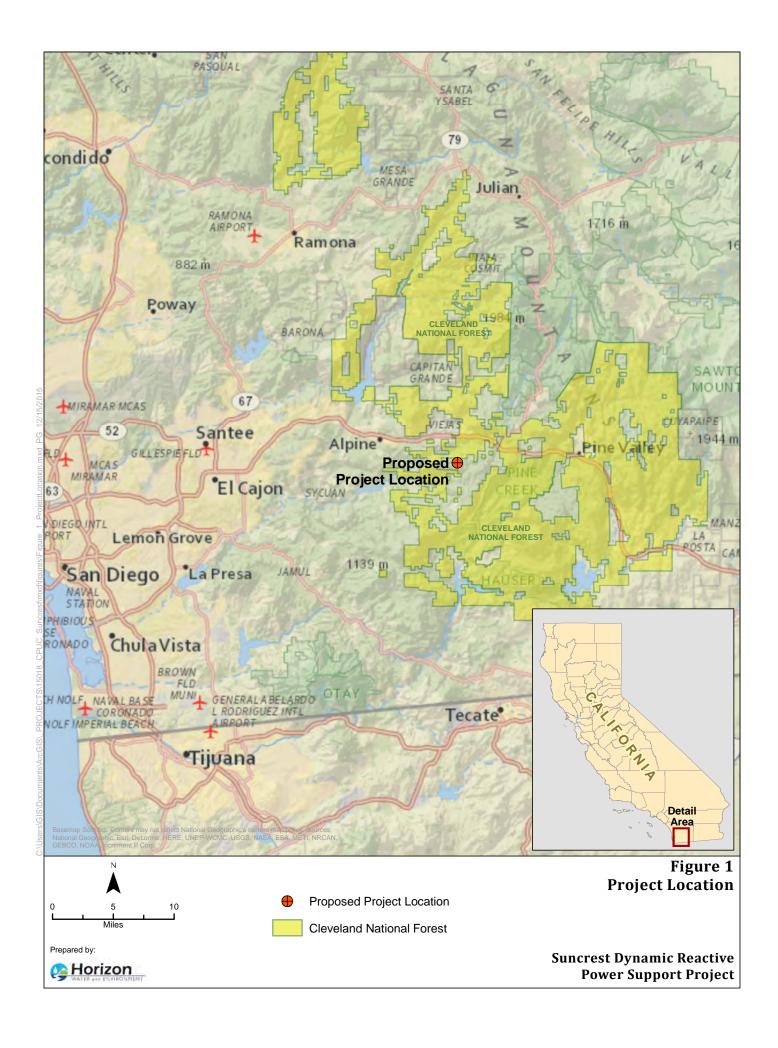
The underground transmission line would be installed in polyvinyl chloride (PVC) conduits within a concrete-encased duct bank system. The bottom of the duct bank would be approximately 5 feet below grade, and the duct bank would be approximately 30 inches wide by 24 inches tall. The underground transmission line would include up to five underground splice vaults spaced roughly every 900 feet to facilitate installation of the underground cables and operation and maintenance of the transmission line. The majority of the underground transmission line would be installed within Bell Bluff Truck Trail; however, installation of the splice vaults may require temporary disturbance outside of the roadbed.

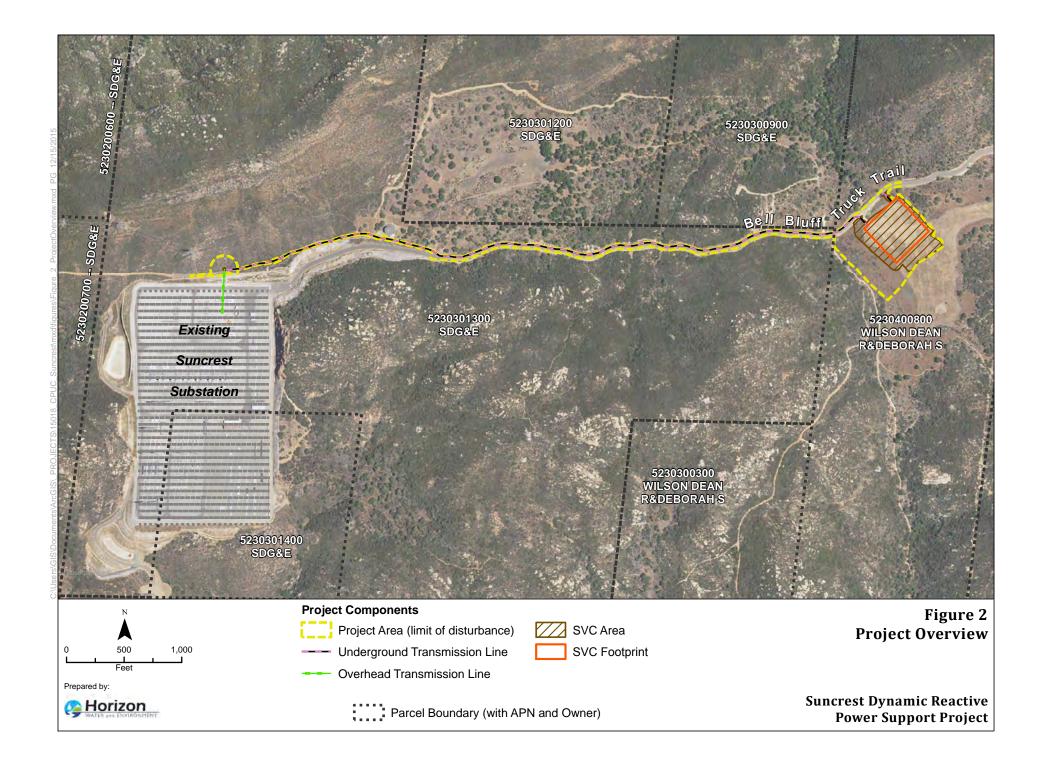
The 85- to 95-foot riser pole, for transition of the transmission line to an overhead span and entry into the existing Suncrest Substation, would be installed north of Bell Bluff Truck Trail. The base of the riser pole would be approximately 7 feet in diameter and require an additional approximately 15-foot radius of permanent disturbance around the riser pole.

Project Construction

Construction of the SVC facility generally would include site clearing, grubbing, grading, and installation of foundations and electrical equipment. Construction of the underground transmission line would be anticipated to be concurrent with construction of the SVC and would follow a general process of utility line locating; survey; asphalt cutting of pavement; trench excavation; installation of duct bank and vaults; pavement restoration; installation of conductor cables and fiber optic cables (for communications for line relaying, SCADA, and other devices as required); and splicing and testing of the line. Grading for the SVC may result in up to 4,000 cubic yards of excess material, which would be hauled off site. In select locations, where material cannot be excavated using a backhoe and/or bulldozer, material removal may require scraping, ripping, drilling, hammering, cutting and localized low energy blasting. Construction of the Proposed Project would result in approximately 6.2 acres of temporary disturbance, accounting for staging area impacts and trenching for underground transmission line installation. When added to the permanent disturbance area of the SVC, total disturbance from the Proposed Project would be approximately 12.2 acres.

The project would take 10 months to construct and is targeted to be operational by June 2017. Typically, construction would occur 10 hours per day, 6 days per week, Monday through Saturday, between 7 a.m. and 7 p.m.; however, certain time-sensitive activities and/or activities which are not noise-intensive may occur outside these hours.





References

CAISO. See California Independent System Operator.

California Independent System Operator. 2014. 2013-2014 Transmission Plan. Retrieved from: https://www.caiso.com/Documents/Board-Approved2013-2014TransmissionPlan_July162014.pdf. Accessed December 14, 2015.

8 ***** Jan. 14, 2016 The Alpine Sun





Local officials, SDG&E urge emergency preparedness during El Niño season

SDG&E announces **\$70,000** donation for emergency generators

SAN DIEGO — San Diego city and county officials, along with San Diego Gas & Electric, shared emergency preparedness plans and outreach efforts aimed at ensuring the needs of the county's most vulnerable residents are met before the next round of intense El Niño storms. Meteorologists are predicting that there could be another 60 days of rain activity leading to flooding, among other hazards.

"Being prepared for storms of this magnitude is critical," said Toni Atkins, California Assembly Speaker. "San Diego officials and businesses like SDG&E have set a fine example by collaborating on preparedness, response and recovery plans that will help keep the region safe."

SDG&E purchased 10,000 "SAFELY OUT KITS" from Citizen Voice to distribute to vulnerable members of the community such as the elderly and those with mobility issues. The kits are complete with materials that can be used if someone is homebound during an emergency. Distribution of the kits has already begun through a

partnership with agencies like Elder Help, Meals-on-Wheels and American Medical Response.

"The cooperation among our region's first responders during last week's storms helped minimize property damage and kept San Diegans safe. I've directed City staff to continue to take aggressive action to prepare our community for more severe weather," said Mayor Kevin L. Faulconer. "El Niño is expected to bring more storms, so now is the time to prepare our families, homes and businesses before the next rains come. I'd like to thank SDG&E for partnering with us to help our most vulnerable residents make sure they can weather the storms."

SDG&E also announced a donation of \$70,000 to the San Diego Regional Fire Foundation for the purchase of three emergency generators to be used at its San Diego County disaster shelters.

"Adding these generators will help ensure the continuation of life-saving services when our most vulnerable residents, such as those needing oxygen, find themselves evacuated to an emergency shelter," said Chairman Roberts. "I want to thank

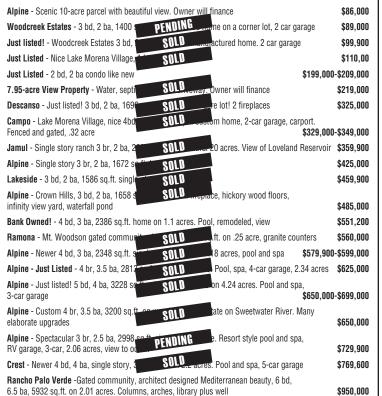
SDG&E for again stepping up to help fill a public safety need."

"With a shared vision of promoting public safety and helping those community members who need it the most, these donations were a natural fit for us at SDG&E," said Caroline Winn, chief energy delivery officer for SDG&E. "We believe that providing essential materials like these kits is another way to help first responders identity who needs help in an emergency. It's an honor to continue to support the Regional Fire Foundation and Citizen Voice in its mission to foster a safer city.

SDG&E is a regulated public utility that provides safe and reliable energy service to 3.4 million consumers through 1.4 million electric meters and 868,000 natural gas meters in San Diego and southern Orange counties. The utility's area spans 4,100 square miles. SDG&E is committed to creating ways to help customers save energy and money every day. SDG&E is a subsidiary of Sempra Energy (NYSE: SRE), a Fortune 500 energy services holding company based in San Diego. Connect with SDG&E's Customer Contact Center at 800-411-7343 on Twitter (@SDGE) and Facebook.

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Join us for a Public Scoping Meeting for the

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

The California Public Utilities Commission (CPUC) invites you to attend a public scoping meeting on NextEra Energy Transmission West, LLC's (NEET West's) proposed Suncrest Dynamic Reactive Power Support Project (Proposed Project). The Proposed Project would involve construction of a dynamic reactive power support facility and an approximately one-mile-long transmission line connecting to the existing Suncrest Substation in south-central San Diego County. The Proposed Project would be located off of and along Bell Bluff Truck Trail road, approximately 5.75 miles east of the community of Alpine. The CPUC is the lead agency for the Proposed Project under the California Environmental Quality Act (CEQA) and has decided to prepare an environmental impact report (EIR). The purpose of the meeting will be to provide information about the Proposed Project and to solicit input on the scope and content of the environmental information to be included in the EIR. Meeting attendees will have the opportunity to submit oral or written comments on the Proposed Project and identify any concerns or issues they would like to have considered in the EIR. The date, time, and location of the public scoping meeting will be as follows:

Thursday, January 21st, 2016, 6:00 pm – 8:00 pm Alpine Community Center 1830 Alpine Blvd., Alpine, CA 91901

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact Tom Engels, Horizon Water and Environment at (916) 790-8548. Auxiliary aides and services are available to individuals with disabilities upon request.

6 ❖ Jan. 21, 2016 THE ALPINE SUN

FIRE LOG

ALPINE FIRE PROTECTION DISTRICT

01/11/2016 13:41:32 2157 Arnold WY /721 EMS call, excluding vehicle 01/11/2016 13:48:50 1635 Foss RD EMS call, excluding vehicle 01/11/2016 19:58:46 1539 Tavern RD /65 EMS call, excluding vehicle 01/12/2016 19:25:00 2660 ALPINE BL /104 EMS call, excluding vehicle 01/13/2016 08:14:37 2001 Tavern RD EMS call, excluding vehicle 01/13/2016 10:31:10 2001 Tavern RD Gas leak (natural gas or LPG 01/13/2016 10:58:53 8770 Harb Canyon RD Gas leak (natural gas or LPG 01/13/2016 11:29:51 15542 OLDE HIGHWAY 80 /LA Disp & cancelled 01/13/2016 15:57:09 I-8 Wb Motor Vehicle Accident with 01/13/2016 16:55:30 2955 Alpine BL Auto Lock-out 01/14/2016 03:31:39 1364 Tavern RD EMS call, excluding vehicle 01/14/2016 03:58:21 948 Alpine Heights RD EMS call, excluding vehicle 01/14/2016 07:13:46 3116 Via Asoleado Dispatched & cancelled en ro 01/14/2016 13:17:56 2400 Alpine BL /71 Assist invalid 01/14/2016 15:56:37 3114 Victoria DR EMS call, excluding vehicle 01/15/2016 07:13:53 2302 Via Dieguenos 01/15/2016 08:30:53 1540 Alpine Terrace RD Person in distress, Other 01/15/2016 09:35:09 1364 Tavern RD EMS call, excluding vehicle 01/16/2016 13:55:08 Anderson Rd / E Victoria EMS call, excl vehicle 01/17/2016 09:51:36 17600 JAPATUL RD Dispatched & cancelled en ro 01/17/2016 16:51:24 2400 Alpine BL /130 EMS call, excluding vehicle 10/13/2012 08:19:15 1849 Alpine BL EMS call, excluding vehicle 10/13/2012 14:03:16 II80 Alpine Heights RD Disp & cancelled en ro 10/13/2012 19:54:22 1750 Arnold WY /96 EMS call, excluding vehicle 10/13/2012 20:08:42 2636 Alpine BL /B EMS call, excluding vehicle 10/14/2012 01:53:19 0 I-8 Eb 622 No Incident found on arrival 10/14/2012 13:42:21 24II Victoria Meadows DR EMS call, excluding





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Volunteers Needed for California's Road Charge Pilot Report outlines statewide piing gas prices, increased use of only \$23 billion of work, leaving

Report outlines statewide pilot to study potential long-term replacement for the state's gas

SACRAMENTO – California is actively seeking 5,000 volunteers to take part in a free study that could shape the way drivers are charged for road usage. Called for by the Legislature in 2014, the Road Charge Pilot Program will produce information for further study on the concept of a "road charge" program. State officials aim to recruit a large number of volunteers reflective of the vast geographic and socioeconomic diversity of the state.

The California Road Charge Technical Advisory Committee released its final recommendations for the statewide road charge pilot study—a system where drivers could pay for road maintenance and repairs based on the number of miles they drive, rather than how much gas they consume. Senate Bill (SB) 1077, signed by the Governor in September 2014, called for the pilot program. The free pilot program will inform the Legislature's decision on whether moving forward with a fullscale permanent road charge program, potentially replacing the gas tax, is worthwhile. The state's current transportation funding system relies on revenue from fuel taxes, which continue to decline with fluctuating gas prices, increased use of hybrid and electric vehicles and overall improvements in new vehicles' fuel economy.

Volunteer participation and feedback will be vital in finetuning the proposed program that could eventually tie highway funding with road usage rather than gas tax proceeds. Volunteer drivers will be able to choose from one of several mileage reporting methods that California will be testing. Volunteering is free and no actual money will be exchanged. Participants will have the choice of submitting mock payments via mail or a secure website for testing purposes. Volunteers can enroll at www.CaliforniaRoad-ChargePilot.com.

"Our recommendations reflect the input we received from hundreds of stakeholders and individuals that represent every region of the state," said Jim Madaffer, Chair of the Technical Advisory Committee. "While this endeavor has been rigorous, it resulted in the unique opportunity to examine a per-mile road charge mechanism as a potential long term solution to the issue of declining transportation revenue facing California."

Caltrans maintains 50,000 lane-miles of highway and nearly 13,000 state-owned bridges. However, the state's current fuel excise tax is sufficient to fund

only \$2.3 billion of work, leaving \$5.7 billion in unfunded repairs each year. If this trend continues, the transportation funding gap will continue to grow and road maintenance and repair needs will continue to escalate.

"The gas tax is outdated and no longer capable of meeting all of our future transportation revenue needs," said Will Kempton, Executive Director of the California Transportation Commission. "The pilot is an excellent opportunity to study road charging and should provide the Legislature the data it needs to better determine whether and how this idea might work in California."

At the conclusion of the pilot, the California State Transportation Agency will issue a report with its findings to the Legislature, the Road Charge Technical Advisory Committee, and the California Transportation Commission. Following receipt of that report, the Commission will make its recommendations regarding the pilot program to the Legislature, which will consider whether to proceed with implementing a road charge system in California.

More information about the California Road Charge Pilot Program and participant volunteer information is available at www.CaliforniaRoadChargePilot.com.

Join us for a
Public Scoping Meeting
for the

NextEra Energy Transmission West, LLC

Suncrest Dynamic Reactive Power Support Project Proposed by

The California Public Utilities Commission (CPUC) invites you to attend a public scoping meeting on NextEra Energy Transmission West, LLC's (NEET West's) proposed Suncrest Dynamic Reactive Power Support Project (Proposed Project). The Proposed Project would involve construction of a dynamic reactive power support facility and an approximately one-mile-long transmission line connecting to the existing Suncrest Substation in south-central San Diego County. The Proposed Project would be located off of and along Bell Bluff Truck Trail road, approximately 5.75 miles east of the community of Alpine. The CPUC is the lead agency for the Proposed Project under the California Environmental Quality Act (CEQA) and has decided to prepare an environmental impact report (EIR). The purpose of the meeting will be to provide information about the Proposed Project and to solicit input on the scope and content of the environmental information to be included in the EIR. Meeting attendees will have the opportunity to submit oral or written comments on the Proposed Project and identify any concerns or issues they would like to have considered

Thursday, January 21st, 2016, 6:00 pm – 8:00 pm Alpine Community Center 1830 Alpine Blvd., Alpine, CA 91901

in the EIR. The date, time, and location of the public scoping meeting will be as follows:

Will you need an accommodation in order to attend and/or participate in this event? If so, please contact Tom Engels, Horizon Water and Environment at (916) 790-8548. Auxiliary aides and services are available to individuals with disabilities upon request.

PROOF OF PUBLICATION

STATE OF CALIFORNIA COUNTY of San Diego

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he/she is the resident of the County of San Diego. That he/she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he/she is not a party to, nor interested in the above entitled matter; that he/she is Chief Clerk for the publisher of

The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

January 15, 2016

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated in the City of San Diego, California on this 29th of January 2016.

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Join us for a
Public Scoping
Meeting
for the
Suncrest Dynamic
Reactive Power
Support Project
Proposed by
NextEra Energy
Transmission West,

LLC The California Public Utilities Commission (CPUC) invites you to attend a public scoping meeting on NextEra Energy Transmis-sion West, LLC's (NEET West's) proposed Suncrést Dynamic Reactive Power Support (Proposed Project The Project). posed Project would involve construction of a dynamic reactive power support facility and an approximately one-mile-long transmission line connecting to the existing Suncrest Substation in south-central San Diego County. Proposed Project would be locáted off of and along Bell Bluff Truck Trail road, approximately 5 75 miles east of the community of Alpine. The CPUC is the lead agency for the Pro-posed Project under the California Envi-Quality ronmental Act (CEQA) and has decided to prepare an environmental impact report (EIR). The purpose of the meeting will be to provide information about the Proposed Project and to solicit input on the scope and content of the environmental information to be included in the EIR. Meeting attendees will have the opportunity to submit oral or written comments on the Proposed Project and identify any concerns or issues they would like to have considered in the EIR. The date, time, and location of the public scoping meeting will be as follows:

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Order ID: 3894295

Attachment C

Meeting Materials and Meeting Notes



CPUC SCOPING MEETING FOR DRAFT ENVIRONMENTAL IMPACT REPORT

NEET West Energy Transmission West, LLC Suncrest Dynamic Reactive Power Support Project

Application No. 15-08-027

California Public Utilities Commission

January 21, 2016





Purpose of Scoping Meeting

- Overview of the California Public Utilities Commission (CPUC) application review processes
- Describe the proposed NextEra Energy Transmission West (NEET West), LLC Suncrest Project
- To allow the public and agencies to provide input on the scope and content of the proposed project's Draft EIR
- Scoping comments inform the scope and nature of the CEQA environmental analysis.

Roles



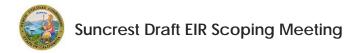
California Public Utilities Commission (CPUC) Lead Agency under CEQA



Horizon Water and Environment Environmental Contractor for CPUC



NextEra Energy Transmission West, LLC (NEET West) Project Applicant



CPUC Process

- Investor-owned utilities must submit a permit application to CPUC for construction of certain infrastructure listed under Public Utilities Code Section 1001
- NEET West filed an Application consisting of:
 - Application for Certificate of Public Convenience and Necessity for the proposed project
 - A Proponent's Environmental Assessment (PEA)
- CPUC has authority to approve or deny the Application
- CPUC permit application review involves:
 - Environmental Review (CEQA)
 - CPUC Proceeding

CEQA Overview

Basic purposes of CEQA (State CEQA Guidelines, Section 15002):

- Inform governmental decision makers and public about potential significant environmental effects of proposed activities.
- Identify ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to environment by requiring changes in projects through use of alternatives or mitigation measures when governmental agency finds changes to be feasible.
- Disclose to public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

CPUC Processes

CEQA PROCESS

Application Process

HEARING PROCESS

PEA Review and Deemed Complete

Utility Files Application and PEA **Protests to Application Filed**

Environmental Review and Public Meetings

Response to Protests

Draft Environmental Document Issued (Summer 2016)

Pre-Hearing Conference

Comments on Draft

Scoping Memo

Environmental Document

Testimony

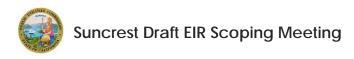
Final Environmental Document Prepared **Proposed Decision**

Evidentiary Hearings (if needed)

Comments on **Proposed Decision**

Briefs

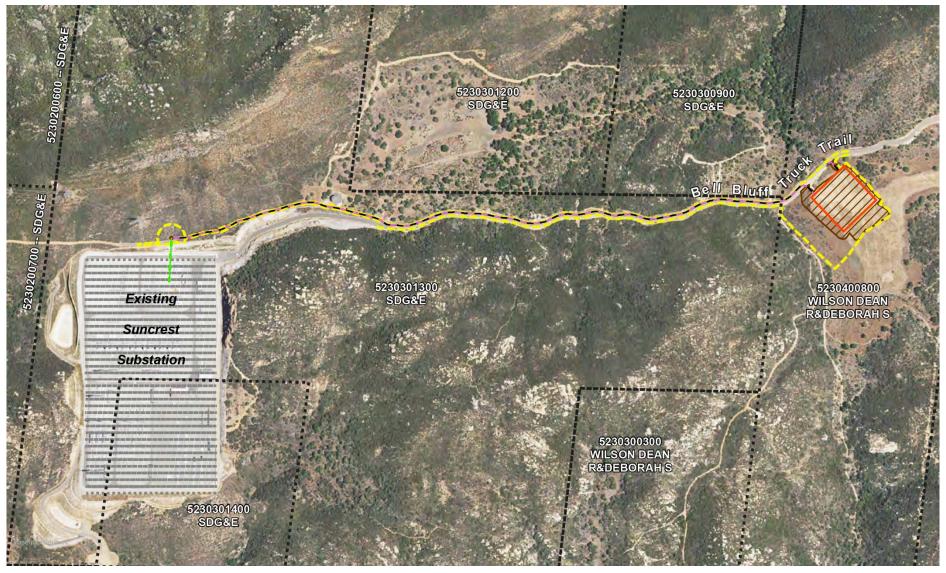
Final Decision and Final Environmental Document



Summary of Applicant's Project Objectives

- Meet the CAISO's identified need for reactive support at the Suncrest Substation's 230 kV bus;
- Improve and maintain the reliability of the transmission grid;
- Facilitate delivery of renewable energy generation from the Imperial Valley area to population centers to the west; and
- Support achievement of the state's Renewable Portfolio Standard.

Where is the Proposed Project?



Simulation of the Proposed Project (looking east)



Proposed Project Components

SVC Facility

- Approximately 6 acres total disturbance
- Contained within approximately 2.6 acres (fenced)

230 kV Transmission Line

- Approximately 1 mile in length
- Beneath Bell Bluff Truck Trail

Overhead Transmission Span

- Approximately 300 feet in length
- Would terminate into the existing San Diego Gas & Electric Suncrest Substation

Project Construction Overview

Construction Schedule

- About 10 months from start to finish
- Anticipated to begin 2016/2017

Workforce

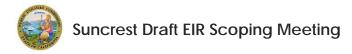
• Up to 64 workers during peak construction

Work Hours

- Monday to Saturday, 7 a.m. to 7 p.m.
- Certain time-sensitive activities may occur outside these hours

Equipment

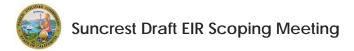
- Variety of general construction vehicles
- Possible blasting



CEQA Draft EIR

TOPICS:

Aesthetics	Land use and planning
Agriculture and forestry resources	Mineral resources
Air quality/greenhouse gas emissions	Noise
Biological resources	Population and housing
Cultural resources	Public services (fire, police, schools, parks)
Geology and soils	Recreation
Hazards and hazardous materials	Transportation and traffic
Hydrology and water quality	Utilities and service systems (water, wastewater, solid waste)



Potential Environmental Issues

Resource	Issues
Biological Resources	WetlandsHermes copper butterfly
Cultural Resources	 Potential buried archaeological resources
Hydrology/Water Quality	Stormwater discharges
Land Use	 Existing nearby mitigation sites
Noise	 Construction noise (including blasting)
Public Services	 Fire protection services
Alternatives	 Existing Suncrest Substation

How Can You Provide Comments?

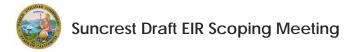
- Informal oral comments and questions tonight
- Preferred: Fill out a comment card to submit written comments and questions tonight
- Preferred: Submit comments after this meeting by mail, phone, or email

Mail	Voice Mail	Email
Mr. Rob Peterson CPUC	(844) 211-7510	suncrestproject@ horizonh2o.com
c/o Horizon Water and		
Environment		
180 Grand Avenue, Suite 1405		
Oakland, CA 94612		

• Comments due by 5:00 p.m. on February 8, 2016

For more information, go to:

http://www.cpuc.ca.gov/Environment/info/horizonh2o/suncrest/index.html



California Public Utilities Commission

Suncrest Dynamic Reactive Power Support Project Proposed by NextEra Energy Transmission West, LLC

Scoping Comment Form

Name:
Group/Organization (optional):
Mailing Address:
Telephone Number (optional):
Email (optional):
Comments/Issues:

Please use additional sheets if necessary.

Submit written comments (postmarked no later than February 8, 2016) to:

Mail: Rob Peterson, CPUC Project Manager

c/o Tom Engels

Horizon Water and Environment, LLC 180 Grand Avenue, Suite 1405

O-Li- - L CA 04612

Oakland, CA 94612

Email: suncrestproject@horizonh2o.com

Place Stamp Here

Rob Peterson, CPUC Project Manager c/o Tom Engels Horizon Water and Environment, LLC 180 Grand Avenue, Suite 1405 Oakland, CA 94612

(fold here)

Tape Here-Do not staple

CPUC Suncrest Scoping Meeting – Thursday, January 21, 2016

- Does the PUC provide legal support for residents to sue SDG&E?
- Where is NextEra from? In California?
 - Andy: NextEra is headquartered in Florida, but have facilities/operations all over North America. Already have \$4.5 billion in infrastructure in CA, but this is their first foray into the transmission sector
- What is the need for this project?
- Have you done environmental impact studies? Done any fieldwork? Where is the documentation for this?
 - o Yes. NextEra has done fieldwork already. Paperwork is in the PEA.
- Will this facility affect groundwater? Construction/operation?
 - o This will be considered in the EIR.
- Does the project use cooling water? Would it take any water out of the ground?
- What about ozone emissions?
- How come the CPUC didn't do an environmental study? Viejas requested a cultural study in August 2014 but it was denied.
 - CPUC hasn't approved anything; CPUC is currently at the beginning of its environmental review process.
- Why didn't you put the facility closer to the wind mills?
 - Andy: CAISO functional specs required it at its current proposed location.
- Are you looking at the existing Suncrest Substation EIR? Will you be cosigning it?
 - Andy: Believes Viejas is talking about the possible lithic scatters in project area. They
 requested additional testing, but NextEra didn't have authorization to conduct testing.
- What about fire danger? Air emissions? Want to know the details of the project to know possible effects.
- Is there really a need for this project? SDG&E said Sunrise Powerlink was not necessary but would be nice to have. They built it to transport electricity from Mexico, and it resulted in rate increases.
 - o EIR will address need for the project, but will not discuss rates.
- Community often does not benefit from these types of projects. San Diego County has highest number of Native Americans in state (?), and there is different value/perspective of the backcountry here.
- EMF radiation effects? Need to know the detailed process inside these facilities.
- This facility will connect with to renewable generation in Imperial Valley? Does that mean more energy coming through Alpine? What about radiation effects? Leukemia?
- Why did SDG&E refer to the Suncrest Substation as 100 acres when you say its 40 acres? Your figure's not to scale.
- Is this new project going to sanitize/clear away Native American sites/artifacts like SDG&E did?
 - o Think we have a better chance of capturing impacts in this case with a smaller site.
- This device supposed to be 230 kV? SDG&E facility had a lot of misinformation.
- How much power goes through the existing substation?
- Is there an underground component to the SVC? How far down will excavation go?
- Will blasting occur? What would happen to artifacts?

- o It's possible some artifacts could be destroyed during blasting if it's required. Want to document what is there and continue to work with the tribe.
- What about fire danger? Big explosion when Suncrest Substation was started.
- What about using these two facilities together? Technical details of process? Is it dangerous?
- In 2012, SDG&E had a north line and another line. Would there be additional lines connected to it [Suncrest Substation] in the future? Think more money will be coming into this area. What are CPUC's long-term goals? This looks like a transfer.
 - o In other words, are you asking: is this a small piece of a bigger pie? If it is, this will have to be discussed in the EIR, because that is required by CEQA/case law.
- Those boxes in the picture look like air filters filtering air underground.
 - o Those are transformers. Nothing operates below grade.
- Is there always an EIR done for projects? Down at a lake; bottom of Lake Jennings, where there was a small transformer yard that's quadrupled in size with lines going over I-8.
- It's been proposed to have a line on Proser (?) Mountain; worried about ongoing SDG&E construction plus this project. Proser (?) Mountain is part of the reservation. Will you build another one of these as SDG&E continues to build?
 - o Andy: CAISO determines that. NEET competition drives down cost in the long run.
- 1,700 MW of stranded power out there? Renewable? Do you know how many homes that would actually power? 2 MW for 10 city blocks. How much energy is/will be coming in from Imperial Valley?
- Why don't they just hook into the line that goes down to Calexico?
- 130 miles from here to desert so how many of these are they putting in?
 - o Rob: Putting similar facilities in Talega, San Luis Rey, etc. In this area, only one.
- Are they going to be using helicopters?
 - o No.
- I know there're a lot of biological resources in that area. What type of mitigation are you going to implement?
 - Tom: We're going to be working with all the state/federal wildlife and water agencies.
 Will be working with the tribe on cultural and other resources.
- In EIR, do they do bio surveys at night or just during the day? A lot of animals only come out at night.
 - o Tom: Will work with biologists plus agencies who have a good idea of what animals are out there. Other agencies may use the EIR to issue permits.
- Who owns the land right now?
 - o Currently privately owned. NextEra has a deal with the landowner.
 - Andy wants to point out that it's possible the permits Tom mentioned (i.e., USACE, CDFW, etc.) might not be required for the project; might not be a nexus with these agencies.
- There are a lot of animals out there: pheasant, chuck, four types of rattlesnake, etc. SDG&E didn't look at any of these.
- Is this going to be a "fast-tracked" EIR? This has happened in the past.
- NOP says there's a time limit for comments, so you are implementing time limits?
 - o Rob: Time limits are mandated by CEQA, but we will work with you.
- Where can we see the EIR?

- Will be posted on the project website or you can put your name on the sign-in sheet or submit a comment and we'll notify you.
- If this project causes fire it could burn up the whole county. Very high fire risk in this area.
- Diane Jacobs at County didn't know about this project until yesterday.
 - o Andy: We have met with fire officials at all levels. Have draft fire construction plan.
- Are you going to use contracted fire suppression services?
 - Andy: County will provide fire support, but we will make sure there are no impacts services. Project unlikely to cause fire. We are more worried about wildfire burning up the facility.
- What about indirect type effects: need for ancillary fire support on standby. Many gallons of fuel were transported/stored for helicopter for Suncrest. What if this fuel were to explode or spill?
- So you're cleaning up power so it can go over to San Diego?
- SDG&E has actually caused fires people's electrical panels/systems in Alpine.
- So SDG&E didn't do their job right. They should have had this type of facility in their station already.
- 500 kV is just the wire size; actual voltage/corona/amperage may be much higher. Volts could be in the millions. When they kick the power up, cell coverage can go out in wide area.
- Dean [property owner]: restoration at the site looks nearly complete. As much vegetation out there as there was before the SDG&E staging.