



County of San Diego

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January 30, 2017
Robert Peterson, C/O Tom Engels
Horizon Water and Environment
180 Grand Avenue, Suite 1405
Oakland, CA 94612

Via email to suncrestproject@horizonh2o.com

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT REGARDING SUNCREST DYNAMIC REACTIVE POWER SUPPORT PROJECT

Dear Mr. Peterson,

The County of San Diego (County) has reviewed the Proposed Suncrest Dynamic Reactive Power Support Project (Proposed Project) Draft Environmental Impact Report (Draft EIR), and appreciates this opportunity to provide input. The County has completed their review and has the following comments regarding the proposed project.

Land Use Authority

The Proposed Project applicant, NextEra Energy Transmission West (NEET West), has applied to the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (Certificate) for the Proposed Project. Upon issuance of the Certificate, NEET West will be a public utility as defined by Public Utilities Code 216 and 218. As a public utility, NEET West will be subject to the land use authority of the CPUC for the Proposed Project.

1. If NEET West does not receive the Certificate, the Proposed Project would be subject to the County's land use authority. County permits would be required for the proposed use, grading, drainage, and the legal subdivision of private property in order to purchase a portion of a legal lot. Permits required by the County in the event the Certificate is not approved should be described in Section 2.5 Permits and Approvals of the Draft EIR.
2. The purpose of the Certificate and its implications to the Proposed Project's land use authority should be described in detail throughout the Proposed Project's Draft EIR.

Alternatives

1. The County recommends approval of the Draft EIR Environmentally Superior Alternative, the Suncrest Substation Alternative (Draft EIR 20.3.3). This alternative avoids close to all of the potential environmental impacts of the Proposed Project by installing the Static VAR Compensator (SVC) on the existing Suncrest Substation site and eliminating the need for a transmission line. San Diego Gas & Electric (SDG&E) has indicated there is room within the existing substation to construct the SVC without expanding the substation footprint (Draft EIR 20.3.3). Co-locating these large industrial-type uses would reduce impacts to rural community character, biological resources, and be more resilient in an emergency such as a firestorm.

County Plans

1. The County requests project consistency with County plans, such as the Multiple Species Conservation Plan, the County Trails Master Plan and General Plan Mobility Element, be analyzed and the Proposed Project conditioned accordingly to ensure compliance with these plans.
2. 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

1. The Proposed Project should comply with the County's Regulatory Section: Section 36.401 for operation and construction of the facilities. During construction for the Suncrest Substation, SDG&E was required to obtain a Noise Variance from the County when construction activity was proposed outside of allowed hours between 7 a.m. and 7 p.m. Monday through Saturday. This was required during the 24-hour oil filling of the transformers. A County Noise Variance is required for the Proposed Project if work outside the normal construction hours is proposed.

Fire

1. The Fire Protection Plan provided in Appendix K of the Draft EIR shall be reviewed and accepted by the San Diego County Fire Authority.
2. This Proposed Project, along with all other development, has a cumulative impact on the emergency services for this community. To mitigate for this impact, the Proposed Project will be conditioned to participate in the existing County Service Area 135 Community Facilities District No. 04-1.

Vector Control Program

The County Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV).

1. The VCP respectfully requests the design features described in the Draft EIR address potential impacts from possible mosquito breeding sources created by the Proposed Project and that the Proposed Project be designed and constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities, vehicle tires, trenching (described in the Draft EIR, page 12-24, paragraph 5) and excavation (described in the Draft EIR, page 12-24, paragraph 5) do not result in depressions that will hold standing water. In addition, ensure best management practices and storm water conveyance systems and structures (described in the Draft EIR, page 12-24, paragraph 1) do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development. Finally, if habitat remediation is required for the Proposed Project, the design should be consistent with guidelines for preventing mosquito habitat creation.
2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.

For your information, the County Guidelines for Determining Significance for Vectors can be accessed at: http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at: <http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf>

Grading/Improvement Plans

If the Proposed Project comes under the County's land use authority, then grading and improvement plans, as required, shall be reviewed and approved prior to issuance of construction permits pursuant to the County Grading Ordinance and County road standards. If the grading or improvement requires the use of County roads to transport materials, then a Truck Haul Route study will be required.

Drainage

If the Proposed Project crosses or has any existing drainages within the project scope, then these should be reviewed to ensure no impacts will occur as a result of the Proposed Project. Any impacts to jurisdictional waters of the United States or State shall be discussed with the

appropriate entities and avoided or, if allowed, mitigated to the satisfaction of the governing authority.

Watershed Protection Program

The Proposed Project may generate potential storm water impacts to adjacent private parcels located in the unincorporated County.

1. Consider updating Local Laws, Regulations, and Policies Section 12.2.3 to include a discussion for the Proposed Project to meet the requirements of the 2013 Municipal Separate Storm Sewer Systems Permit Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, and the County Best Management Practices Design Manual (dated February of 2016).

The County looks forward to receiving future documents and/or notices related to this Proposed Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Emma Schoppe, Land Use / Environmental Planner at [REDACTED]

Sincerely,



Joseph Farace, Group Program Manager
Advance Planning Division
Planning & Development Services

Attachment A: Bell Bluff Trail CTMP

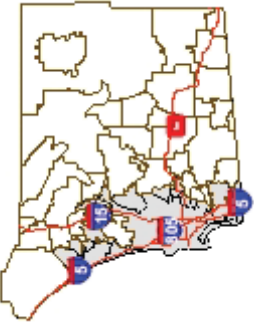
Email cc:

Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Keith Corry, Policy Advisor, Board of Supervisors, District 3
Adrian Granda, Policy Advisor, Board of Supervisors, District 4
Melanie Wilson, Board of Supervisors, District 5
Vincent Kattoula, CAO Staff Officer, LUEG
Leann Carmichael, Program Manager, LUEG
Jeff Kashak, Environmental Planner, DPW
Sheri McPherson, Project Manager, DPW
Marcus Lubich, Project Manager, DPR
Deborah Mosley, Group Program Manager, DPR
James Pine, Deputy Fire Marshal, County Fire Authority
Daniel Valdez, Environmental Health Specialist, DEH
Ed Sinsay, Planning Manager, PDS

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Jarrett Ramaiya, Planning Manager, PDS
Laurel Lees, Planning Manager, PDS
Emma Schoppe, Land Use/Environmental Planner, PDS

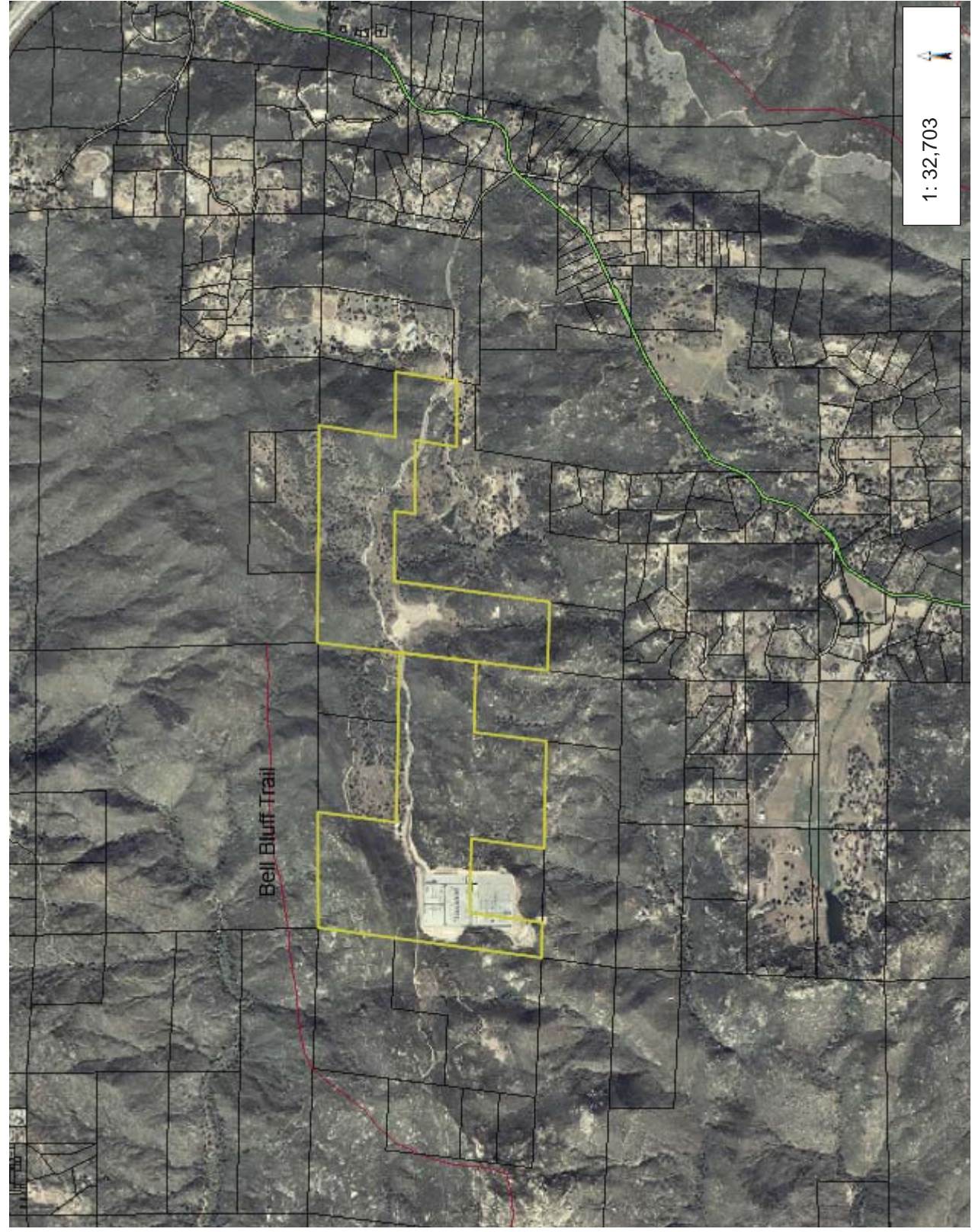
Bell Bluff Trail



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



1: 32,703

1.0 Miles

0.52

0

1.0

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