



February 2, 2026

California Public Utilities Commission  
Collinsville 500/230 Kilovolt Substation Project  
c/o Panorama Environmental, Inc.  
717 Market Street, #400  
San Francisco, California 94103  
[collinsville@panoramaenv.com](mailto:collinsville@panoramaenv.com)

Re: Comments on the Collinsville 500/230 Kilovolt Substation Project (SCH No. 2025010149)

Dear California Public Utilities Commission,

Martin Marietta Marine Operations, LLC, Lind Marine, Inc., and their joint venture Suisun Associates (collectively, “Lessees”) hold leases from the California State Lands Commission (“CSLC”) to mine construction-grade sand from discrete and limited areas in Central San Francisco Bay and in the Suisun Bay area of the western Sacramento-San Joaquin Delta. Lessees and their predecessors have helped develop the State’s critical mineral resources for decades, providing sand to a diverse set of public and commercial uses including public infrastructure, roadways, hospitals, schools, and housing, as well as coastal resilience, wetland restoration, and beach replenishment projects. We are writing to provide comments on the Draft Environmental Impact Report (“DEIR”) and Collinsville 500/230 Kilovolt Substation Project (“Collinsville Project”) proposed by LS Power Grid California, LLC (“LSPGC”), which is expected to cross portions of the Suisun Lease Area (PRC 7781.1).

Lessees have reviewed the DEIR and support the currently proposed alignment of the LSPGC 230 kV submarine segment. Lessees and LSPGC have been working cooperatively to facilitate the Collinsville Project while seeking to minimize its impacts on Lessee’s operations and important mineral resources of the State of California. The currently proposed alignment minimizes such impacts.

Although Lessees support the currently proposed alignment of the 230 kV submarine segment, any modification to that alignment that would further encroach and overlap the existing mineral lease area and increase the severity of this already significant and unavoidable impact would be inconsistent with the California Environmental Quality Act (“CEQA”) mandate that public agencies not approve projects if feasible alternatives are available that would substantially lessen the significant environmental effects.<sup>1</sup> The Draft EIR confirms that the currently proposed alignment is feasible and minimizes impacts to the State’s important mineral resources. Lessees submit these comments on the Collinsville Project and DEIR to emphasize the regional and statewide importance of its mining operations and the public

---

<sup>1</sup> Pub. Resources Code, §§ 21002, 21092.1; CEQA Guidelines, § 15088.5, subds. (a), (c).

policies they advance.

## BACKGROUND

The California Legislature declared through enactment of the Surface Mining and Reclamation Act of 1975 (“SMARA”), that “the extraction of minerals is *essential* to the continued economic well-being of the state and to the needs of the society.”<sup>2</sup> The Legislature has further emphasized that “the production and development of local mineral resources that help maintain a strong economy and that are *necessary* to build the state’s infrastructure are *vital* to reducing transportation emissions that result from the distribution of hundreds of millions of tons of construction aggregates that are used annually in building and maintaining the state.”<sup>3</sup> For these reasons, it has remained “the continuing policy of the State . . . to foster and encourage private enterprise in . . . [t]he orderly and economic exploration, development, and utilization of the state’s mineral resources. . . .”<sup>4</sup>

In furtherance of these long-held state policies, Lessees’ operations foster the use of State mineral resources, supplying a local source of construction aggregate essential to the regional economy and infrastructure, and reducing transportation distances and associated greenhouse gas and other air emissions. Alluvial sand and gravel mined by Lessees is a high-quality construction-grade aggregate used throughout the Bay Area in concrete and fill for hospitals, schools, affordable housing, major transportation improvements, and utility infrastructure. Bay sand is also utilized for shoreline resilience and beach restoration projects that help combat the adverse effects of sea-level rise and climate change. In addition, Lessees’ operations generate significant revenues for the State and local agencies through annual royalties and rent, contributing to the State’s economic well-being.

## PROJECT APPROVAL

The DEIR correctly recognizes that installation of the LSPGC 230 kV submarine segment would intersect with Lessees’ active sand mining operations in Suisun Bay, conducted under CSLC Lease No. PRC 7781.1 (Suisun Bay/Western Delta).<sup>5</sup> Specifically, the submarine segment would prohibit sand mining activities in an approximately 52-acre portion of the lease area.<sup>6</sup> This area includes a buffer on either side of the segment cable to minimize any risk of cable strike.<sup>7</sup> Preliminary calculations indicate that this restriction would render approximately 1,762,000 to 5,117,000 cubic yards of construction-grade sand—a critical mineral resource of the State—

---

<sup>2</sup> Pub. Resources Code, § 2711(a), emphasis added.

<sup>3</sup> Pub. Resources Code, § 2711, subd. (d).

<sup>4</sup> Pub. Resources Code, § 2650, subd. (a).

<sup>5</sup> DEIR, p. 4.12-3.

<sup>6</sup> DEIR, p. 4.12-9.

<sup>7</sup> *Ibid.*

permanently unavailable for mining.<sup>8</sup>

As long recognized, “it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . . .”<sup>9</sup> Generally, “the lead agency must adopt feasible mitigation measures or project alternatives to reduce the effect to insignificance.”<sup>10</sup> If such measures or alternatives are insufficient to render the environmental impact insignificant, the lead agency may still approve the project if it adopts a statement of overriding considerations.<sup>11</sup> However, adopting such a statement does not negate the statutory obligation to implement feasible measures or alternatives.<sup>12</sup>

In addition to the requirement to adopt feasible mitigation measures or alternatives, CEQA obligates a lead agency to recirculate an EIR when, prior to certification, “significant new information is added. . . .”<sup>13</sup> New information may be “significant” when that information includes a change resulting in a “substantial increase in the severity of an environmental impact” or when the project proponent declines to adopt “a feasible project alternative . . . that clearly would lessen the environmental impacts of the project. . . .”<sup>14</sup> Further, an EIR must contain an “accurate, stable, and finite project description,” including a description of the project’s “precise location and boundaries. . . .”<sup>15</sup> Thus, if a project is changed in a manner that substantially increases the severity of a significant impact, the EIR must be recirculated for public review.<sup>16</sup>

---

<sup>8</sup> According to Lessees, sand reserves within Suisun are estimated to extend from current grade down to at least a depth of between minus fifty feet (-50’) and minus ninety feet (-90’). At these depths and based on current bathymetry in the area, available sand resources expected to be lost range between 33,880 cubic yards per acre (1,762,000 cubic yards total) to roughly 98,413 cubic yards per acre (5,117,000 cubic yards total).

<sup>9</sup> Pub. Resources Code, § 21002; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564–565.

<sup>10</sup> *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 231; *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1356–1357 [warehouse EIR failed to include sufficient facts supporting conclusion that reduced-size alternative was infeasible].

<sup>11</sup> Pub. Resources Code, § 21081, subd. (b).

<sup>12</sup> *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 852; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524–525 [“Even when a project’s benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless . . . truly infeasible.”].

<sup>13</sup> Pub. Resources Code, § 21092.1; CEQA Guidelines, § 15088.5, subds. (a), (c).

<sup>14</sup> *Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1129–1130; *East Oakland Stadium Alliance v. City of Oakland* (2023) 89 Cal.App.5th 1226, 1266 [recirculation required when added information reveals substantial increase in environmental impact].

<sup>15</sup> CEQA Guidelines, § 15124.

<sup>16</sup> *Save Our Capitol! v. Department of General Services* (2023) 87 Cal.App.5th 655, 193; *Federation of Hillside and Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1267 fn.12.

Lessees provide this context to highlight that the Collinsville Project's removal of approximately 1,762,000 to 5,117,000 cubic yards of construction-grade sand from the State's available mineral resources has implications that extend beyond the lease area itself. For example, by supplying aggregate close to where it is needed, Bay sand mining reduces transportation distances and associated emissions, directly supporting California's climate and air-quality objectives. In contrast, importing aggregate from distant sources would increase fuel consumption, greenhouse gas emissions, air pollution, and traffic congestion. Lessees' operations also support and preserve local jobs—particularly for tug and barge crews and other workers integral to mining, transport, and handling—that would otherwise be at risk if local sources were displaced by distant imports. Lastly, the loss of this resource could hinder the State's ability to achieve its infrastructure, climate, and economic-development objectives.

Lessees recognize that the currently proposed alignment of the LSPGC 230 kV submarine segment may be necessary to fulfill the objectives of the Collinsville Project. Thus, the Lessees remain committed to working with LSPGC to facilitate the Collinsville Project and support its currently proposed alignment while minimizing impacts on important mineral resources to the extent feasible. Conversely, Lessees oppose and caution against any adjustment in the alignment that may expand its footprint in the mineral lease area or otherwise reduce the volume of minerals available for extraction, as doing so would result in even greater significant and unavoidable impacts on the availability of important mineral resources under Impacts MIN-1 and MIN-2.<sup>17</sup>

## CONCLUSION

We appreciate the opportunity to comment on the Collinsville Project and DEIR. Lessees look forward to working with LSPGC, the California Public Utilities Commission, and the CSLC to ensure that the implementation of the Collinsville Project can proceed while ensuring that impacts on Lessee's operations and California's critical mineral resources are avoided or minimized to the maximum extent feasible.

Sincerely,



Erika Guerra  
Martin Marietta Materials



William H. Butler  
Lind Marine

cc: Nicole Dobroski, Chief, Division of Environmental Science, Planning, and Management  
Christopher Huitt, Senior Environmental Scientist  
Joseph Fabel, Senior Attorney  
California State Lands Commission

---

<sup>17</sup> DEIR, pp. 4.12-9–4.12-11.