

3 COMMENTS AND RESPONSES

3.1 AGENCY COMMENTS AND RESPONSES

This section contains responses to comments received from public agencies. Responses follow each comment letter.

3 COMMENTS AND RESPONSES



Comment Letter A1

DEPARTMENT OF THE ARMY

Los Angeles District Corps of Engineers
Regulatory Division-Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008

May 22, 2015

REPLY TO
ATTENTION OF

Office of the Chief
Regulatory Division

Ms. Connie Chen
Environmental Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102-3298

SUBJECT: Information regarding requirement for Department of the Army Permit

Dear Ms. Chen:

A1-1

This is in response to information received regarding SDG&E Salt Creek Substation Project (A-13-09-014). Based on the information you have provided, we are unable to determine if the proposed work would be regulated under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please review your project and determine if you need a permit.

Applications and additional information are available on our website <http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx>. If you have any questions, please contact Shari Johnson of my staff at 760-602-4829 or via e-mail at Shari.Johnson@usace.army.mil.

Sincerely,

Therese O. Bradford
Chief, South Coast Branch

3 COMMENTS AND RESPONSES

3.1.1 Response to Letter A1: Therese Bradford, USACE Los Angeles District

A1-1 Comment noted. The preliminary project design avoids impacts to waters of the United States. However, the need for a permit under Section 404 of the Clean Water Act would be determined during final design of the approved project if the Commission decides to grant the requested Permit to Construct. A Section 404 permit is listed in Table 2.9-1: Required Permits and Approvals. The proposed project is not regulated under Section 10 of the Rivers and Harbors Act.

3 COMMENTS AND RESPONSES

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Comment Letter A2



*Serious drought.
Help save water!*

June 17, 2015

11-SD-125
PM 4.1
Salt Creek Substation DEIR

Ms. Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. Chen:

The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (DEIR) for the proposed Salt Creek Substation project near State Route 125 (SR-125). We have the following comments:

In the statements of Mitigation Measure Traffic – 1

Mitigation Measure Traffic-1: SDG&E should prepare and submit to Caltrans a Highway Closure Plan as part of the encroachment permit application. The plan should require that closure or partial closure of SR-125 comply with the California Manual on Uniform Traffic Control Devices (Part 6, Temporary Traffic Control), Standard Plans, and Standard Specifications for traffic control systems. The plan should conduct work so as to create the least possible inconvenience to the traveling public; traffic should not be unreasonably delayed. This may be limited to off-peak, non-daytime hours. The plan should include detours for SR-125 traffic, including routes and signage. SDG&E should provide evidence of Caltrans approval of the plan to CPUC at least 15 days prior to initiating installation of the crossings.

Timing:

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans right of way until an encroachment permit is approved.

A2-1

Highway closure times will be reviewed and approved by Caltrans to minimize delay to traveling public.

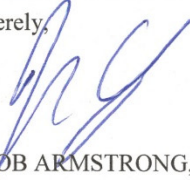
*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

3 COMMENTS AND RESPONSES

Ms. Connie Chen
June 17, 2015
Page 2

If you have any questions on the comments Caltrans has provided, please contact Roger Sanchez of the Development Review Branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Development Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

3 COMMENTS AND RESPONSES

3.1.2 Response to Letter A2: Jacob Armstrong, Caltrans District 11

A2-1 Mitigation Measure Traffic-1 has been revised in response to this comment, as shown below:

Mitigation Measure Traffic-1: SDG&E shall prepare and submit to Caltrans a Highway Closure Plan as part of the encroachment permit application at least 30 days prior to initiating installation of crossings of SR-125. The plan shall require that closure or partial closure of SR-125 be limited to off-peak, non-daytime hours, from 10 p.m. to 5 a.m., and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Highway closure times will be reviewed and approved by Caltrans to minimize delay to SR-125 traffic. The plan shall also outline suggested detours for SR-125 traffic, including routes and signage. SDG&E shall provide evidence of Caltrans approval of the plan to CPUC at least 15 days prior to initiating installation of the crossings. No work shall begin in Caltrans right-of-way until the encroachment permit and Highway Closure Plan are approved by Caltrans.

3 COMMENTS AND RESPONSES



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

June 30, 2015

Comment Letter A3

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

Subject: Salt Creek Substation Project
SCH#: 2014081032

Dear Connie Chen:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 29, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

3 COMMENTS AND RESPONSES

Document Details Report State Clearinghouse Data Base

SCH# 2014081032
Project Title Salt Creek Substation Project
Lead Agency Public Utilities Commission

Type EIR Draft EIR
Description San Diego Gas & Electric (SDG&E) proposes to construct and operate the Salt Creek Substation Project in southeastern Chula Vista, CA. The project includes a new 120-megavolt-ampere 69/12-kilavolt distribution substation south of Hunte Parkway within an 11 acre parcel and a new 5-mile long 69 kV power line to bring power from the existing Migue! Substation to the proposed Salt Creek Substation. The new 69 kV power line would be constructed within SDG&E's right-of-way, adjacent to two 230 kV power lines and one 69 kV power line.

Lead Agency Contact

Name Connie Chen
Agency California Public Utilities Commission
Phone 415 703 2168 **Fax**
email
Address 505 Van Ness Avenue
City San Francisco **State** CA **Zip** 94102-3298

Project Location

County San Diego
City Chula Vista
Region
Cross Streets Hunte Parkway and Exploration Falls Drive
Lat / Long
Parcel No.
Township

Range	Section	Base
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Proximity to:

Highways I-125
Airports
Railways
Waterways Otay Lake; Otay River
Schools High Tech High
Land Use SDG&E fee-owned land and right-of-way

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission

Date Received 05/15/2015 **Start of Review** 05/15/2015 **End of Review** 06/29/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

3 COMMENTS AND RESPONSES

SCH #2014 08 1032

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
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clear
6/29/15
E
REC
JUN 17 2015
STATE CLEARING HOUSE



Serious drought.
Help save water!

June 17, 2015

11-SD-125
PM 4.1
Salt Creek Substation DEIR

Ms. Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. Chen:

The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (DEIR) for the proposed Salt Creek Substation project near State Route 125 (SR-125). We have the following comments:

In the statements of Mitigation Measure Traffic – 1

Mitigation Measure Traffic-1: SDG&E should prepare and submit to Caltrans a Highway Closure Plan as part of the encroachment permit application. The plan should require that closure or partial closure of SR-125 comply with the California Manual on Uniform Traffic Control Devices (Part 6, Temporary Traffic Control), Standard Plans, and Standard Specifications for traffic control systems. The plan should conduct work so as to create the least possible inconvenience to the traveling public; traffic should not be unreasonably delayed. This may be limited to off-peak, non-daytime hours. The plan should include detours for SR-125 traffic, including routes and signage. SDG&E should provide evidence of Caltrans approval of the plan to CPUC at least 15 days prior to initiating installation of the crossings.

Timing:

The Highway Closure Plan, as part of the encroachment permit, should be submitted to Caltrans at least 30 days prior to initiating installation of the crossings. No work shall begin in Caltrans right of way until an encroachment permit is approved.

A3-2

Highway closure times will be reviewed and approved by Caltrans to minimize delay to traveling public.

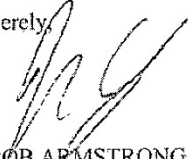
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to enhance California's economy and livability"*

3 COMMENTS AND RESPONSES

Ms. Connie Chen
June 17, 2015
Page 2

If you have any questions on the comments Caltrans has provided, please contact Roger Sanchez of the Development Review Branch at (619) 688-6494.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Development Review Branch

*"Provide a safe, sustainable, interconnected and efficient transportation system
to enhance California's economy and livability"*

3 COMMENTS AND RESPONSES

3.1.3 Response to Letter A3: Scott Morgan, California State Clearinghouse

A3-1 Comment noted.

A3-2 Refer to response to comment A2-1.

3 COMMENTS AND RESPONSES

3.2 APPLICANT COMMENTS AND RESPONSES

This section includes the comments received from the Applicant (SDG&E), with individual comments delineated and followed by responses to each comment. Comments were provided by SDG&E in a letter and a supplemental table. The letter provided a summary of SDG&E's comments on the Draft EIR. The table provided line by line suggested corrections to the Draft EIR text. Comments included editorial corrections, technical clarifications and corrections, and provision of supplemental data on special-status Hermes copper butterfly. Where changes were not incorporated, an explanation is provided.



David L. Geier
Vice President – Electric Transmission &
Systems Engineering
8330 Century Park Ct
San Diego • CA 92123-1530

June 29, 2015

Connie Chen
California Public Utilities Commission
c/o Panorama Environmental, Inc.
One Embarcadero Street, Suite 740
San Francisco, CA 94111

Re: Draft Environmental Impact Report for Salt Creek Substation Project
(State Clearinghouse No. 2014081032)

Dear Ms. Chen:

Enclosed please find comments by San Diego Gas & Electric Company (SDG&E) on the Draft Environmental Impact Report (Draft EIR) prepared by the California Public Utilities Commission (CPUC) for the proposed Salt Creek Substation Project (Salt Creek Project). SDG&E commends the CPUC on its comprehensive analysis and consideration of SDG&E’s Salt Creek Project. The Draft EIR documents the effort by the CPUC to ensure resources are used appropriately and cost-effectively and that all possible alternatives to the project as proposed are taken into consideration. SDG&E’s primary goals in preparing these comments are to assure an accurate and complete record. SDG&E would be happy to provide additional information upon request. In this case, SDG&E believes that the few, temporary significant impacts identified in the Draft EIR for the Salt Creek Project are significantly outweighed by the capacity and reliability provided by the proposed substation and power lines. As explained in more detail below, SDG&E urges the CPUC to prepare and certify the Final EIR and approve the Salt Creek Project as proposed in the original application without further delay:

B1-1

- The Draft EIR is the product of many years of thorough analysis and consideration. Customer load in the south San Diego County, particularly in the Chula Vista area, has continued to grow during that time, and the Salt Creek Project would provide much-needed reliability for existing and future system needs.
The Draft EIR erroneously concludes that Alternative 2 (relying on generation at Border and Larkspur Electric Generating Facilities instead of constructing TL 6965) is the environmentally superior alternative, as it fails to acknowledge that

B1-1

the Alternative 2 emissions surpass the amortized emissions of the Salt Creek Project very early in the project life, as early as the third year.

- Alternative 2 also fails to reduce any of the significant impacts associated with the Salt Creek Project. Instead, Alternative 2 appears to base its “environmentally superior” status on reduction of impacts that are already less than significant. There is no basis under CEQA to select Alternative 2 in place of the proposed Salt Creek Project.
- The conservative analysis presented in the Draft EIR overestimates the potential significant impacts of the Salt Creek Project and in some cases recommends mitigation measures that are unnecessary, disproportionate to the impact or in conflict with existing requirements.
- Specific overriding considerations outweigh any potential environmental impacts of the Salt Creek Project.

Thank you for the opportunity to comment on the Draft EIR and for your efforts to reach this significant milestone. We look forward to continuing to work with you to implement this important capacity and reliability project.

Sincerely,



David L. Geier
Vice President – Electric Transmission &
Systems Engineering
San Diego Gas & Electric Company

SALT CREEK SUBSTATION PROJECT

**SAN DIEGO GAS & ELECTRIC COMPANY’S COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT**

San Diego Gas & Electric Company (“SDG&E”) appreciates the opportunity to provide comments to the California Public Utilities Commission (“CPUC”) on the Draft Environmental Impact Report (“DEIR”) for the Salt Creek Substation Project (“Proposed Project”).

Several of SDG&E’s comments address important legal issues, including the selection of alternatives, assessment of significant impacts, and imposition of mitigation measures. SDG&E requests that the CPUC incorporate the following information into the Final Environmental Impact Report (“FEIR”).

SDG&E’s Proposed Project would construct a new 120-MVA, 69/12-kV electric distribution substation including three distribution circuits, an underground loop-in of an existing 69-kV power line (TL 6910) and fiber optic line. DEIR at p. 2-1. It would also include construction of approximately 5 miles of overhead 69-kV power line and 1,000 feet of underground power line between Miguel Substation and the proposed Salt Creek Substation (TL 6965). *Id.* Finally, the Proposed Project would add a new circuit position at Miguel Substation for TL 6965. *Id.*

Although the DEIR labels Alternative 2 the environmentally superior alternative, the information and analysis in the DEIR, the Proponent’s Environmental Assessment (“PEA”) and supporting documents indicate that SDG&E’s Proposed Project is the environmentally superior option for meeting the project objectives and minimizing environmental impacts. SDG&E’s Proposed Project would: (1) meet the area’s projected long-term electric distribution capacity needs by constructing the proposed substation near planned load growth to maximize system efficiency; (2) provide three 69-kV circuits into the proposed substation to serve load growth in the region and meet the regulatory requirements of the North American Electric Reliability Corporation (“NERC”), Western Electric Coordinating Council (“WECC”) and California Independent System Operator (“CAISO”); (3) provide substation and circuit tie capacity that would provide additional reliability for existing and future system needs; (4) reduce loading on area substations to optimum operating conditions, providing greater operational flexibility to transfer load between substations within the proposed substation service territory; (5) comply with and respect the outcome of the extensive community-based public process to select a site for a new substation in the Otay Ranch area; (6) meet proposed project needs while minimizing environmental impacts; and (7) locate proposed new power facilities within existing utility right-of-ways, access roads, and utility-owned property. As such, SDG&E requests that the FEIR reflect the Proposed Project as the environmentally superior option.

B1-2

B1-3

Separately, SDG&E requests revisions to certain impact analyses in alignment with the California Environmental Quality Act (“CEQA”). Mitigation measures should be revised to ensure that they are feasible, proportionate, and consistent with existing requirements. SDG&E also requests that certain technical inaccuracies in the DEIR be corrected in the FEIR, as set forth in the attached charts of proposed line revisions.

B1-4

The comments and attached materials more fully describe SDG&E’s concerns and include proposed modifications to the mitigation measures and DEIR to address these concerns. SDG&E believes that none of the information in these comments would trigger recirculation of the DEIR. SDG&E appreciates CPUC’s review and consideration of these comments and looks forward to working with the CPUC in furtherance of this important reliability project.

B1-5

I. Environmental Review Does Not Support Eliminating TL 6965 from the Proposed Project.

SDG&E has proposed to construct approximately 5 miles of new overhead 69-kV power line and 1,000 feet of underground power line (TL 6965) within existing right of way. The DEIR concludes that Alternative 2, relying on generation at Border and Larkspur Electric Generating Facilities instead of constructing TL 6965, would be the environmentally superior alternative. DEIR pp. 6-6, 6-8. SDGE respectfully disagrees with this conclusion and requests that the Proposed Project be selected.

B1-6

A. The Proposed Project Is the Environmentally Superior Alternative.

The Proposed Project, including construction of TL 6965, would be environmentally superior to Alternative 2 over the life of the project. In response to CPUC’s recommendation that Alternative 2 would be environmentally superior, SDG&E compared the emissions (in metric tons of CO2 equivalents or “metric tons CO2e”) associated with construction and operation of the Proposed Project to the emissions associated construction and operation of Alternative 2. This analysis shows that in the immediate short term, emissions associated with construction of the Proposed Project would be greater than Alternative 2. However, within three years, the overall emissions associated with Alternative 2 exceed the overall emissions associated with the Proposed Project. That is, the operational emissions created by Alternative 2 far exceed the operational emissions of the Proposed Project and these operational emissions quickly add up to “cancel out” any emissions saving associated with not building TL 6965.

B1-7

The DEIR implies that such analysis may have been done, but it is not adequately addressed. The greenhouse gas analysis in Table 6.5-1: Comparison of the Proposed Project to Project Alternative Impacts ranks Alternative 2 fifth overall, below the Proposed Project, which is ranked second. DEIR p. 6-11. This table explains that the Proposed Project has the “lowest amortized greenhouse gas emissions over the estimated 30-year life of the facility.” *Id.* However, this does not seem to have been acknowledged in the air quality comparison, which

B1-7 | ranks Alternative 2 second, and the Proposed Project third.

B1-8 | This DEIR analysis should have explicitly compared the lifetime air quality and greenhouse gas impacts rather than focusing on construction impacts. Indeed, SDG&E’s analysis demonstrates that the annual Alternative 2 emissions surpass the amortized emissions of the Proposed Project very early in the project life; as early as the third year.

CEQA also requires that the lead agency consider and prioritize energy conservation. Pub. Res. Code §21100(b)(3). One way to do so is to avoid unnecessary consumption of energy. *Id.* CEQA Guidelines Appendix F provides lead agencies with a framework for analyzing energy conservation toward the goals of decreasing overall per capita energy consumption and decreasing reliance on fossil fuels. It requires that in an EIR, “[a]lternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy.” Appendix F(II)(E).

B1-9 | The Proposed Project avoids unnecessary consumption of energy by making efficient use of the existing power that has already been generated and transmitting it through the grid in a reliable manner. In contrast, Alternative 2 increases consumption of energy. Given that such energy consumption is not necessary under the Proposed Project, the Alternative 2 energy consumption can be classified as “unnecessary.” As such, it should be avoided pursuant to Appendix F.

B1-10 | The fact that Border and Larkspur use fossil fuels (natural gas) to generate electricity is also relevant. Implementing Alternative 2 would increase energy and fossil fuel use to improve reliability by generating additional electricity. The Proposed Project, however, would improve reliability without increasing energy or fossil fuel use. This aligns with CEQA, which discourages additional fossil fuel use. Appendix F prioritizes “increasing reliance on renewable energy sources” instead of fossil fuels. Appendix F(I)(3). This is in accord with the California renewable energy portfolio standards derived from AB32, and from SDG&E’s Long Term Procurement Plan (“LTTP”). Both policies prioritize conservation and renewable energy use ahead of fossil fuel use.

B1-11 | Over time, the environmental benefits of the Proposed Project will continue to accrue relative to Alternative 2. The Proposed Project would create fewer emissions, would consume less energy, and would use less fossil fuel relative to Alternative 2.

B1-12 | **B. SDG&E’S Objective 2 Should Be Retained.**
SDG&E articulated as Objective 2 that the project should “provide three 69-kV circuits into the proposed substation to serve load growth in the region and meet the regulatory requirements of the North American Electric Reliability Corporation (NERC), Western Electric

Coordinating Council (WECC), and California Independent System Operator (CAISO).” DEIR p. 2-1. This objective was included to articulate the regulatory requirements imposed upon SDG&E in order to maintain reliability. In particular, the NERC, WECC, and CAISO each establish standards to ensure that the overall electric generation, transmission, and distribution systems remain reliable over a broad spectrum of system conditions, including credible contingency situations in which there are generation and/or transmission outages. As a participant in the electric system, SDG&E must ensure that its system complies with the reliability standards set forth for the nation, region, and state.

Three 69-kV circuits in the Salt Creek substation are needed to meet the regulatory requirements articulated by NERC, WECC, and CAISO and protect against service outages. Without these three circuits, the reliability of the system risks falling short of the regulatory requirements. Two examples illustrate how this would occur under Alternative 2, versus the Proposed Project. First, under heavy summer loading conditions, without TL 6965, a thermal overload is more likely to occur on TL 649 in the event of a Category B outage (i.e., an unanticipated loss of a single transmission element, such as a line or transformer) than if the Proposed Project were constructed and there were three 69-kV circuits in the Salt Creek substation. Second, again without TL 6965, in the event of an unexpected contingency on one of the two power lines feeding Salt Creek substation, an overload could occur on TL649 due to generation at Border substation not being able to be brought on line quickly enough to respond to unexpected loss of a power line; it would therefore be necessary to dispatch Border generation under all system conditions where an overload on TL649 might occur. With the Proposed Project, in contrast, the possibility of such outage would be greatly lessened unless there were simultaneous contingencies on two of the other 69-kV circuits. This is a much less likely scenario. The likelihood of overloads under Alternative 2 would increase over time as the load at the Salt Creek substation increases due to population growth in the surrounding area. The need for TL 6965 is expected to continue to increase over time, and therefore the likelihood that NERC, WECC, and CAISO violations would occur would similarly increase in the absence of the Proposed Project.

B1-12

Eliminating Objective 2 increases the likelihood of selecting an alternative (like Alternative 2) that does not meet the applicable regulatory standards and resulting reliability needs.

C. The Alternatives Analysis Should Focus on Reducing Significant Impacts.

The DEIR’s alternatives discussion considers all impacts, rather than focusing on the reduction of significant impacts as required by Public Resources Code Section 21002. Indeed, Alternative 2 does not reduce any of the significant impacts from the Proposed Project to a less-than-significant level. Both the Proposed Project and Alternative 2 would have significant and unavoidable impacts on aesthetics, noise, and recreation. There is no basis to select Alternative 2

B1-13

B1-13 | as the environmentally superior project.

CEQA requires that the alternatives analysis focus on the reduction of significant impacts, rather than a reduction in any impacts, including those that are less-than-significant impacts. “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project...” CEQA Guideline §15126.6(b). Similarly, “[t]he range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA Guideline §15126.6(c). And finally, “[a] matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison.” CEQA Guideline §15126.6(d).

B1-14

The aesthetics analysis provides a clear example. The DEIR concludes that the construction and operation of TL 6965 would have less-than-significant impacts on Impacts Aesthetics-1 and -2. DEIR pp. 4.1-38 to -48. These impacts would be less than significant because they would not significantly change the overall intactness of the immediate landscape. DEIR p. 4.1-38 to -45. The immediate landscape already contains TL 6910, which would be similar in form, line, color, and texture to TL 6965 and it also already contains TL 23041/42, which is taller and more dominant. DEIR p. 4.1-38. Yet Table 6.5-1 says that Alternative 2 “[a]voids permanent visual impact from new power line.” DEIR p. 6-9. *See also*, DEIR pp. 6-3, 6-9. It appears that Alternative 2 was chosen, in part, because it reduced an impact that the DEIR had already determined to be less than significant.

B1-15

The recreation analysis is similarly flawed. The DEIR concludes that trail closures or detours would create less-than-significant impacts. DEIR pp. 4.13-8 to -10. But the Alternatives analysis concludes that Alternative 2 would reduce this already less-than-significant impact. DEIR pp. 6-4, 6-13. *See also*, discussions of Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Public Services, Transportation and Traffic, and Utilities and Service Systems. DEIR pp. 6-3 to 6-4; 6-9 to 6-14.

B1-16

It appears that Alternative 2 was selected on the basis of reductions to less-than-significant impacts. Given that it does not reduce any of the significant impacts to a less-than-significant level, there is no CEQA basis to select Alternative 2 instead of the Proposed Project.

B1-17

D. There Are Additional Reasons that Alternative 1 Should Not Be Selected.

The DEIR properly determined not to select Alternative 1 as environmentally superior. DEIR pp. 6-5 to 6. Alternative 1 would construct a larger 230/12-kV substation and include a 230-kV loop-in of the existing 230-kV line that is in the transmission corridor adjacent to the

B1-17 | substation. DEIR p. 3-7. SDG&E believes that it would be appropriate to include a more robust discussion as to why Alternative 1 fails to meet the project objectives and would create greater significant impacts than the Proposed Project.

B1-18 | Alternative 1 would compromise the reliability that the Proposed Project is designed to achieve. First, there are no existing 230/12-kV substations in the SDG&E system, so this would be a unique system component requiring extensive new design and engineering. Operation, maintenance, and repair of the nonstandard transformers would be costly and time consuming. This compromises the reliability of the system as a whole because there are not existing protocols for operations, maintenance or repair of such transformers and because the equipment itself would be unique (even requiring a third spare 230/12-kV transformer to be procured initially), so replacement parts would differ from standard available parts.

With Alternative 1, if one of the transformers was out of commission, the entire substation load would need to be handled by a single transformer until a spare transformer was connected. Moreover, if either of the transmission lines feeding the Alternative 1 substation has a fault, then utilization of the substation would be compromised. This contrasts with the Proposed Project, which would provide for three sources feeding the substation to provide a reliable distribution substation design.

B1-19 | The impacts of Alternative 1 would be more significant than those of the Proposed Project. The visual impacts would be markedly greater because the 230/12-kV substation would need to be much taller and would require larger cable poles to loop in the 230 kV transmission line. Concerns have been raised regarding the visibility of the proposed, smaller substation from nearby residences, so the visibility and visual impacts should not be increased by selecting Alternative 1.

II. The DEIR Seeks to Impose Mitigation Measures that Are Not Necessary and that Conflict with Existing Requirements.

A. No Mitigation Is Required for Less-Than-Significant Impacts.

B1-20 | Under CEQA, the lead agency must analyze and impose mitigation measures that could feasibly reduce significant impacts. Pub. Res. Code §21002; CEQA Guideline §15126.4(a)(1). However, CEQA does not require mitigation of less-than-significant impacts. “Mitigation measures are not required for effects which are not found to be significant.” CEQA Guideline §15126.4(a)(3).

Notwithstanding this limitation, the DEIR imposes mitigation and proposes “optional mitigation” for impacts that are less than significant. SDG&E respectfully requests that the unnecessary mitigation measures be removed from the document.

B1-20 | A number of the mitigation measures are overly broad and protect against impacts that are not possible to occur, or that would be less-than-significant. For example:

B1-21 |

- Mitigation Measure BIO-6 is intended to avoid impacts on nesting birds. In part, it requires nest survey buffers for golden eagle and Swainson’s hawk. DEIR pp. 4.4-57 to -58. Such buffers do not relate to any biological impact, much less a significant impact. There is no suitable habitat for golden eagle within 1 mile of the project site and Swainson’s hawk does not nest in the region.

B1-22 |

- Mitigation Measure BIO-7 is intended to protect bats. It is overly broad because it applies to all bats when in fact, the only bat that is a Species of Special Concern in the project area is the western yellow bat. BIO-7 should be revised so that it is appropriately tailored to potential impacts. Potential impacts could occur to western yellow bat maternity roosts during the breeding season. Comment #26, 27, 28 articulates textual changes to tailor the mitigation measure appropriately.

B1-23 |

- Mitigation Measure BIO-8 relates to protection for San Diego desert woodrat. This is a covered species under the NCCP, so additional mitigation for this species is not appropriate. Perhaps more importantly, no San Diego desert woodrat individuals or nests were observed during the biological surveys. It is unlikely that the project would have any impact on the San Diego desert woodrat. Comment #29 articulates textual changes to the mitigation measure.

B1-24 |

- Mitigation Measure HYDRO-1 regulates temporary access roads that would be constructed across drainages. But this does not relate to any potential impact because the project will not construct new temporary access roads across drainages. Comment #63 articulates textual changes to this mitigation measure.

B1-25 | In the aesthetics analysis, the DEIR creates Optional Measure Aesthetics-1, requiring SDG&E to “install opaque mesh along the fence of all staging yards used for the proposed project to screen the view of the staging yards from public vantage points, such as roads.” DEIR p. 9-7. This measure is intended to reduce the visual impacts caused by construction work at the staging yards. However, the DEIR determines that such impacts are less-than-significant. DEIR p. 4.1-46. Under CEQA, no mitigation is required for such less-than-significant impacts. Indeed, classifying this measure as “optional” indicates that it is not required to mitigate a significant impact.

Similarly, the biological resources analysis imposes “Optional Measure Biology-1: To further minimize the construction-related direct impacts to San Diego County sunflower (a species that has limited distribution in California, but is not a federally or state-listed endangered

B1-25

plant), San Diego County sunflower shall be included in the planting/seed mix for re-vegetation of temporary impacts in suitable habitat areas.” DEIR p. 9-28. This measure is intended to mitigate impacts to the San Diego Sunflower. *Id.* Such impacts were determined to be less than significant. DEIR p. 4.4-34. No CEQA mitigation is required.

B1-26

B. The Biological Mitigation Measures Must Be Internally Consistent, Feasible to Implement, and in Alignment with the Regulatory Framework.

SDG&E follows its Natural Communities Conservation Plan (“NCCP”), the Low-Effect Quino Checkerspot Butterfly Habitat Conservation Plan (“QCB HCP”), and all applicable laws and regulations governing impacts to biological resources. Together, these documents provide a comprehensive regulatory framework for managing impacts on biological resources.

The DEIR articulates mitigation measures that overlap and conflict with the applicant proposed measures (“APMs”) and the existing regulatory framework. SDG&E respectfully requests that the mitigation measures be revised to align with the APMs and existing regulatory framework so that the mitigation measures are clear and able to be implemented. Such revisions will facilitate SDG&E’s ability to report compliance and the CPUC’s ability to track compliance. The following analysis describes the problems associated with the biological mitigation measures as they are articulated in the DEIR.

B1-27

Mitigation Measures BIO-1, BIO-2, BIO-8, BIO-10, and BIO-11 are duplicative of, but not identical to the APMs implementing the NCCP. It is unclear from the wording of mitigation measures themselves whether the CPUC intends to require these mitigation measures in addition to compliance with SDG&E’s NCCP, or in place of SDG&E’s NCCP. The NCCP provides a comprehensive program for avoidance, minimization, and compensation for SDG&E impacts to covered species and their habitats. If SDG&E is able to utilize the NCCP for this project, several of the mitigation measures proposed should not be required. SDG&E respectfully requests clarification that these mitigation measures will not apply to the extent that SDG&E relies instead on the approved and/or amended NCCP. SDG&E acknowledges that if it does not rely on the approved and/or amended NCCP, then Mitigation Measures BIO-1, BIO-2, BIO-8, BIO-10, and BIO-11 will apply.

Even if SDG&E does not rely upon the NCCP for the new construction, it must still comply with the NCCP’s protocols for operations and maintenance. The Proposed Project was designed to comply with such protocols, and includes appropriate design features to that end. When a project has been designed to avoid or minimize environmental impacts, the project design features are not themselves mitigation measures. Instead, CEQA requires the lead agency to separate out the project design features from the mitigation measures being imposed. CEQA Guideline §15126.4(a)(1)(A).

B1-27

SDG&E respectfully requests that the portions of biological mitigation measures that are covered by the NCCP’s operations and maintenance protocols be deleted. This will ensure that there is a single, enforceable set of compliance and reporting measures that is internally consistent. Such clarity will facilitate SDG&E’s reporting and CPUC’s monitoring of compliance. The particular line edits to accomplish this task are articulated in the attached table at Comment #16 (regarding Mitigation Measure BIO-1).

B1-28

- Mitigation Measure BIO-1 includes requirements for compensatory mitigation for temporary and permanent impacts to vegetation communities. DEIR p. 9-20. These requirements are not “operational protocols,” but are instead construction impact protocols. The timing to fulfill these requirements is different than the timing for fulfilling the other requirements in Mitigation Measure BIO-1. Therefore, SDG&E requests that these measures be removed from Mitigation Measure BIO-1 and placed in a separate mitigation measure to facilitate implementation, reporting, and monitoring of this measure.

B1-29

- The compensatory mitigation in Mitigation Measure BIO-1 also conflicts, in part, with the NCCP requirements. The NCCP Section 7.2 requires monitoring for 3 years whereas mitigation Measure BIO-1 requires monitoring for 5 years (DEIR p. 9-20). The measure should be revised to conform to the NCCP requirements.

B1-30

In addition to conflicting with the NCCP requirements, certain other biological mitigation measures conflict with other regulatory requirements. Mitigation Measure BIO-3 addresses the introduction and spread of invasive weeds. DEIR p. 4.4-43. As drafted, it is not feasible to implement and it requires approvals that are not possible within the existing regulatory framework. For example, neither Cal-IPC nor the County Agriculture Commissioner provide affirmative “authorization” or consultation. SDG&E has proposed textual changes that fulfill the intent of the mitigation measure in a feasible manner that complies with the existing regulatory framework. See Comment #19.

B1-31

Mitigation Measure BIO-6 avoids impacts to nesting birds, but it applies an overly broad definition of “nest.” DEIR p. 9-22. The California Department of Fish and Wildlife (“CDFW”) has promulgated draft regulations defining “active nest” for the purposes of protecting nesting birds. Mitigation Measure BIO-6 should follow the CDFW regulatory language. This appropriately defers to the expert agency, but it also facilitates field implementation and ultimate monitoring of results by unifying the applicable requirements.

B1-32

Mitigation Measure BIO-9 governs herbicide application, which is already adequately governed by law, the NCCP, and SDG&E’s standard protocols. The Mitigation Measure BIO-9 should be deleted in its entirety to avoid duplicative and internally inconsistent requirements

B1-32 | regarding herbicide application.

C. Other Mitigation Measures Must Also Align with Applicable Regulations.

B1-33 | Under CEQA, mitigation measures must be “feasible.” CEQA Guideline §15126.4(a). “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, legal, social, and technological factors.” CEQA Guideline §15364. Where SDG&E is already required to take a particular action, a mitigation measure that requires a different, conflicting action is not feasible because SDG&E cannot implement contradictory measures. Moreover, repetitive actions would duplicate efforts and waste resources.

The DEIR has created several mitigation measures that duplicate or conflict with existing requirements. These mitigation measures should be revised to align with the applicable regulations so that they are feasible for SDG&E to implement.

B1-34 | Mitigation Measure Geology-1 would apply to temporary surface disturbances. Such disturbances are already governed by California State Water Resources Control Board Order No. 2009-0009-DWQ (the California Construction General Permit) and the SDG&E Best Management Practices (“BMP”) Manual for Water Quality Construction. The Mitigation Measure should be revised to conform to the California Construction General Permit and the SDG&E BMP Manual. The particular line edits to accomplish this are articulated in the attached table at Comment #46.

B1-35 | Mitigation Measure GHG-1 governs disposal of organic matter. The California Legislature recently adopted AB1826 governing this same topic. The Mitigation Measure should be revised to align with AB1826, including the definition of “organic waste” so that it is feasible for SDG&E to comply with both the mitigation measure and the law. The particular line edits to accomplish task are articulated in the attached table at Comment #47, 114.

B1-36 | Applicant Proposed Measure (“APM”) Hazards-3 applies to wildland fire prevention and fire safety practices. DEIR p. 9-36. The DEIR revised the measure as proposed by SDG&E. In the DEIR, APM Hazards-3 prevents any work from occurring during high fire risk. DEIR p. 9-36. This conflicts with existing requirements and best practices, which prohibit only “at risk” activities during high fire danger periods. SDG&E requests that the language be clarified to prohibit only “at risk” activities; i.e., those activities that present a risk of fire danger. The particular line edits to accomplish task are articulated in the attached table at Comment #55, 56, 57. This change will bring the APM into alignment with existing policies and procedures, and it will avoid undue delays in the project by allowing SDG&E to complete activities that do not pose fire risk in a timely fashion.

B1-37

III. The DEIR Overstates Project Impacts.

CEQA requires an adequate analysis of environmental impacts to inform the decision-makers and the public of the environmental impacts that the project may have. CEQA Guideline §15002(a)(1). The DEIR has overstated the environmental impacts of the Proposed Project in several respects.

A. Changes for Users of Recreational Areas Is Not a CEQA Impact.

The DEIR determines that the Proposed Project will have a significant and unavoidable recreational impact on the users of nearby trails because project construction appearance and noise may reduce the desirability for recreationalists to use parks. DEIR pp. 4.13-10-11. This is not a CEQA impact, and should not be considered a significant and unavoidable impact of the Proposed Project.

CEQA requires lead agencies to identify and analyze the significant environmental effects that may result from a project. Pub. Res Code §§21100(a), (b); CEQA Guideline §15143(a). The purpose is to identify the significant effects of a project on the environment. Pub. Res. Code §21002.1(a). A “significant effect on the environment” is a “substantial or potentially substantial, adverse change in the environment.” Pub. Res. Code §21068; CEQA Guideline §15382. “‘Environment’ means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.” Pub. Res. Code §21060.5; CEQA Guideline §15360.

B1-38

Indeed, Appendix G articulates the inquiries that a lead agency should undertake when preparing an initial study. The breadth of the Appendix G inquiries indicates the kinds of impacts that a project can have on the environment. Appendix G advises thorough consideration of a project’s impacts on aesthetics, noise and recreation. But the CPUC’s inquiry extends beyond what Appendix G requires.

With regard to noise, Appendix G articulates four relevant standards: 1) noise in excess of standards; 2) excessive ground-borne noise; 3) a substantial permanent increase in noise; and 4) a substantial temporary or periodic increase in ambient noise. The state CEQA Clearinghouse has determined that when a lead agency has responded to these inquiries, it has adequately analyzed noise impacts. The CPUC analyzed these impacts and found that the Proposed Project would have a less-than-significant impact on standards 1, 2, and 3, but it would have a significant and avoidable impact on 4. This analysis was sufficient.

The DEIR expanded the noise analysis beyond the Appendix G standards by extending it into the recreational impact analysis. Appendix G articulates two inquiries for recreational impacts 1) increased use of nearby parks causing physical deterioration and 2) construction of

B1-38 recreation facilities which might affect the environment. Under CEQA, these inquiries are sufficient. But the DEIR created entirely new inquiries, unrelated to the Appendix G standards, asking whether the Proposed Project would have a substantial adverse effect on the recreational value of existing recreational facilities. DEIR p. 4.13-10. It determined that there would be a significant and unavoidable adverse impact because the visual presence of a construction site, and the noise of project construction and helicopter use would affect the recreational value of the nearby parks. DEIR p. 4.13-11.

B1-39 This determination was made without articulating a threshold of significance. CEQA Guideline §15064.7(a) requires that a threshold of significance be “an identifiable quantitative, qualitative or performance level of a particular environmental effect...” Here, there is no identifiable threshold as to when “recreational value” would be affected. Nor are there any data or methodologies articulated that would connect any project impacts with the value of the recreational facilities.

B1-40 Even if the DEIR had articulated a particular threshold, the alleged impacts here would fall short of significance. Any noise impact would be temporary, and would be ameliorated as soon as construction in a particular area was finished. Any visual impact would also be temporary, and ameliorated as soon as the landscaping began to grow in around the construction.

B1-41 SDG&E respectfully requests that the DEIR noise and recreation analyses follow the Appendix G inquiries. Recreational Impacts-3 and -4 should be removed and should therefore not be considered “significant and unavoidable” impacts of the project.

B1-42 **B. The Estimates for Biological Impacts Should Match the Project’s Potential for Creating Biological Impacts.**

SDG&E carefully and thoroughly delineated the Proposed Project’s potential impacts to sensitive habitat communities. The latest Pre-activity Survey Report (“PSR”), which data has been provided to the CPUC, estimates a total of approximately 11 acres of potential impacts. The PSR was conducted pursuant to the NCCP protocols, which protocols estimate potential impact areas at a fine-grained level. These estimates are important for SDG&E to use in its planning for potential mitigation that will be needed.

B1-43 Notwithstanding this fine-grained estimate that was generated in accordance with the NCCP protocols, the DEIR anticipates that the Proposed Project could have permanent and temporary impacts on 14.14 acres¹ of vegetation communities. DEIR Table 4.4-8, p. 4.4-29. SDG&E has reviewed the documentation in the DEIR and has not been able to re-create the calculations used to develop the total impact area. SDG&E previously requested the underlying data to support the DEIR calculations, but has not yet received such data. SDG&E stands by its

¹ This calculation does not include any impacts at the Hunte Parkway staging yard, which is discussed *infra*.

B1-43 | calculations derived from the PSR and requests that the estimated impact area be reduced to reflect the PSR data.

B1-44 | To the extent that the DEIR included the Hunte Parkway Staging Yard in its estimates of biological impacts, that inclusion was improper. The Sweetwater School District owns that staging yard and will be using it for school development. At the time that the CPUC issued its Notice of Preparation (“NOP”), the site had already been graded in preparation for future development of a middle school. The school district has undergone its own environmental review and mitigation process for such development. Given that the baseline condition (see discussion of baseline, *infra*) for the site is disturbed, any impacts and mitigation for non-native grassland associated with the staging yard should not be included in the analysis for the Proposed Project.

B1-45 | In sum, the DEIR should be revised to match the Proposed Project’s potential for biological impacts. The most accurate data that should be used to make that calculation come from the PSR and do not include any impacts to non-native grassland at the Hunte Parkway Staging Yard.

C. The DEIR Mischaracterizes Hermes Copper Butterfly, Which In Any Event Does Not Require Mitigation.

B1-46 | The DEIR characterizes the Hermes copper butterfly as a California Species of Concern, when it is not. DEIR p. 4.4-27. Instead, it is a federal candidate species that the U.S. Fish and Wildlife Service (“FWS”) has not prioritized for listing because any threats to the species are “nonimminent.” “Endangered and Threatened Wildlife and Plants; Review of Native Species That Are Candidates for Listing as Endangered or Threatened; Annual Notice of Findings on Resubmitted Petitions; Annual Description of Progress on Listing Actions; Proposed Rule,” 79 Federal Register 234 (5 December 2014), pp.72450-72497, 72474.

B1-47 | Mitigation Measure BIO-4 would require SDG&E to conduct surveys for the Hermes copper butterfly within 1 year prior to project construction activities. Mitigation Measure BIO-5 would require mitigation for impacts to Hermes copper butterfly habitat. In response to these proposed mitigation measures, SDG&E conducted a habitat assessment on June 12 and June 16, 2015 to determine whether there is any suitable habitat for the Hermes copper butterfly within the Proposed Project footprint, plus a 100-foot buffer. During the assessment, no adult Hermes copper butterflies were observed. Suitable habitat areas are those that include any woody (mature) spiny redberry shrub (*Rhamnus crocea*) with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. The habitat evaluation determined that there are only four instances of spiny redberry shrub within the BSA, and each of those instances is outside of the project impact area. The Proposed Project will not have any impact on suitable habitat. SDG&E therefore requests that Mitigation Measure

B1-47 | BIO-4 and Mitigation Measure BIO-5 (mitigation for impacts to suitable habitat) be deleted from the DEIR.

D. Temporarily Closing Short Segments of Bikeways and Sidewalks Is Not a Significant Impact.

A significant impact is a “substantial, adverse change.” CEQA Guideline §15382. Although a lead agency is afforded deference in its determinations, any such determination must be supported by substantial evidence in the record. Pub. Res. Code §21168.

B1-48 | The DEIR determines that the project will have a significant impact because temporarily closing short segments of bikeways and sidewalks will cause a significant impact on greenhouse gas emissions. DEIR p. 4.7-8. The DEIR bases this conclusion on San Diego County’s Climate Action Plan and the City of Chula Vista’s CO2 Reduction Plan. The County’s Plan seeks to increase walking and biking, among other things. DEIR p. 4.7-3. The City’s plan seeks to designate bikeways and bike lanes, improve pedestrian safety, and facilitate pedestrian connection with transit. DEIR p. 4.7-4. The DEIR concludes without explanation that temporarily blocking portions of bike and pedestrian paths would conflict with these plans. DEIR p. 4.7-8.

There is no evidence that the project would conflict with the plans or otherwise cause the kind of “substantial, adverse change” to the environment that constitutes a significant impact under CEQA. The County’s plan seeks to increase walking and biking. There is no evidence to support the notion that a temporary path closure conflicts with a policy to generally increase walking and biking throughout the County. Similarly, the project would have no effect on the City’s policies to designate bikeways and bike lanes, improve pedestrian safety, or facilitate pedestrian/transit connections. Short-term temporary closures would have no impact on the County and City climate action plans and this should not be considered a significant impact.

E. The Impacts Analysis Should Use the Proper Baseline.

B1-49 | The DEIR’s analysis of aesthetic impacts assesses how the Proposed Project will affect future developments, including a proposed regional park trail and planned development. See, e.g., DEIR pp. 4.1-31, -34 (Figure 4.1-10), and -35 (Figure 4.1-11). This analysis concludes that the Proposed Project would have significant impacts on viewers in these future developments. DEIR p. 4.1-37. However, neither the proposed Otay Valley Regional Park Trail nor the future University Village currently exists and any potential future impact on views from proposed trails or developments that have yet to be approved or constructed is highly speculative.

CEQA requires the lead agency to analyze how the project will affect the “physical environmental conditions in the vicinity of the project, as they exist at the time the notice of

B1-50

preparation is published.” CEQA Guideline §15125(a); *see also* CEQA Guideline §15126.2(a). The analysis should focus on the project’s impacts on the actual environment, not on a hypothetical situation. *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 955.

B1-51

Under these standards, the proper baseline environmental condition for the DEIR is the physical environment surrounding the Proposed Project as of September 2014. DEIR p. 4-2. In September 2014, neither the Otay Valley Regional Park Trail nor the University Village had been built. There are no formal trail easements and no improvements have yet been made. There is no indication that either will be built by the time the Proposed Project is constructed. It was inappropriate to determine that the Proposed Project would have a significant impact on future development that does not, and may never, exist.

SDG&E requests that the references to the significant impact on future developments be removed from the DEIR.

IV. The Minor Project Refinement Process Should Align with CEQA Standards.

The DEIR articulates a “Minor Project Modification” process that imposes significant environmental review requirements before necessary project refinements can be made.

In the interest of certainty, CEQA sets a high bar for when additional environmental analysis is required after a project has been approved in reliance on an EIR. Once adopted without challenge, a CEQA document “shall be conclusively presumed to comply with [CEQA] for purposes of its use by responsible agencies,” unless certain limited circumstances allow for the preparation of a subsequent document. Pub. Res. Code §21167.2. No subsequent environmental report may be prepared unless:

B1-52

- (1) substantial changes are proposed in the project which require major revisions of the environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of environmental effects;
- (2) substantial changes occur with respect to the circumstances under environmental impact report due to the involvement of new significant environmental effects or a substantial increase in the severity of environmental effects; or
- (3) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

Pub. Res. Code §21166; CEQA Guideline §15162.

B1-52

Importantly, mere “changed circumstances” or “project changes” are not enough to permit a subsequent environmental review document—the changes must be substantial and must result in new or greater impacts than were considered in the original document. CEQA Guideline §§15162(a)(1), (a)(2). Similarly, new information must be of substantial importance to new or increased environmental impacts to warrant the preparation of a new environmental document. CEQA Guideline §15162(a)(3).

B1-53

The DEIR turns this standard on its head, effectively requiring environmental review prior to any minor project modification in Section 9.2. DEIR p. 9-3. It should be revised to align with the CEQA standards because the intent of Section 9.2 is to determine whether supplemental CEQA review is required pursuant to Public Resources Code section 21166 or CEQA Guideline §15162(a). In particular, a minor project modification should include minor project changes that will not trigger additional, unanticipated permit requirements and that do not result in a new significant impact or substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR. SDG&E further requests that the process be renamed “Minor Project Refinement” rather than “Minor Project Modification.”

V. No Recirculation is Necessary.

SDG&E appreciates the opportunity to comment on the DEIR. None of SDG&E’s comments articulated herein or in the attached table requires significant new information to be added to the EIR when it is finalized that would require the DEIR to be recirculated.

B1-54

Under CEQA, a DEIR must be recirculated for public comment when “significant new information is added.” CEQA Guideline §15088.5(a). “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” *Id. See also, Laurel Heights Improvement Assn v. Regents of University of Calif.* (1993) 6 Cal.4th 1112. The kind of information that triggers recirculation is information showing a new significant impact, a substantial increase in the severity of a significant impact, or a considerably different alternative or mitigation measure that would lessen significant impacts and that the Applicant declines to adopt. CEQA Guideline §15088.5(a)(1) through (3). Conversely, information that “merely clarifies or amplifies or makes insignificant modifications in an adequate EIR” does not require recirculation. CEQA Guideline §15088.5(b).

The information contained in this narrative and the attached table clarifies, amplifies, and proposes minor modifications to the DEIR. It does not suggest that there are any new significant impacts or that any impacts would be substantially increased. In fact, many of SDG&E’s

B1-54 | comments explain that the Proposed Project’s impacts would be substantially less than what the DEIR expects. As such, there is no need to recirculate the DEIR before the FEIR is finalized.

VI. Conclusion.

B1-55 | SDG&E appreciates the CPUC’s review of SDG&E’s Proposed Project and SDG&E’s comments on the EIR. SDG&E respectfully requests that the CPUC consider SDG&E’s comments set forth herein and in the attached proposed line revisions when preparing the FEIR.

SALT CREEK SUBSTATION PROJECT

Overriding Considerations

SDG&E's Proposed Project would construct a new 120-MVA, 69/12-kV electric distribution substation including three distribution circuits, an underground loop-in of an existing 69-kV power line (TL 6910) and fiber optic line. DEIR at p.2-1. It would also include construction of approximately 5 miles of overhead 69-kV power line and 1,000 feet of underground power line between Miguel Substation and the proposed Salt Creek Substation (TL 6965). *Id.* Finally, the Proposed Project would add a new circuit position at Miguel Substation for TL 6965. *Id.*

B1-56

The significant environmental impacts identified in the Draft Environmental Impact Report ("DEIR"), relating to aesthetics, noise, and recreation¹ are minor and temporary in nature. DEIR 6-2 to -5. The aesthetics and recreation impacts result from the construction and presence of the substation until the landscaping matures within 5 years following construction of the Proposed Project. DEIR 4.1-24 to -48; 4.13-10 to -11; 6-5. The noise impacts result from construction and would conclude within 18 to 24 months. DEIR 4.11-26 to -29; 6-5.

These short-term impacts are more than significantly outweighed by the benefits associated with the Proposed Project. The Project will provide a wide range of substantial economic, legal, social, technological and other benefits to the region, including but not limited to, furthering federal and state transmission policies and goals and improving safety and reliability in the region. *See* Proponent's Environmental Assessment Section 2.0 (Purpose and Need) (incorporated herein by reference). More specifically, these benefits include:

B1-57

- The proposed Salt Creek Substation would add capacity in the southeastern Chula Vista area. Expected electrical load growth, the desire to avoid extended outages and disruption of services to new and existing customers in the area, and the need to maintain reliable service to SDG&E customers are primary driving factors in determining the need to construct a new substation in the area.
- The Proposed Project would create the reserve capacity in area substations that is necessary to handle outages and manage routine maintenance by transferring load to avoid disruption of customer service.
- An additional benefit of developing a new substation is to ensure reliability of service to customers. SDG&E designs and develops substations to meet this objective. SDG&E considers additional substation transformer capacity when the

¹ SDG&E disagrees with the CPUC's conclusion that the recreation impacts are significant, as explained in the DEIR comment letter.

loss of a single transformer may cause an interruption to major commercial/industrial load that cannot be restored through use of 12kV circuit ties to other substations. The proposed Salt Creek Substation meets this requirement, as it would provide needed capacity and additional 12kV distribution circuit ties with the substations currently serving the area to avoid service interruptions.

- B1-57
- The existing power network (TL 6910) provides only two 69kV sources with the loop-in of TL 6910 into the new 120MVA Salt Creek Substation. This creates violations of mandatory NERC/WECC/CAISO reliability criteria that can only be addressed in the short term by dispatching local generation. The amount of local generation required to mitigate these reliability criteria violations would increase over time, as the load at Salt Creek grows. Without the additional power line from Miguel to the proposed Salt Creek Substation (TL 6965), the region is also vulnerable to bulk power system failures which may lead to the interruption of power to customers. The addition of TL 6965 would provide an additional source of power for the proposed Salt Creek Substation and would ensure that the system meets regulatory requirements and applicable reliability criteria.

B1-58

In sum, the benefits of the Proposed Project far outweigh the minimal environmental impacts. The Proposed Project represents a permanent improvement to the electrical infrastructure in San Diego County, and more particularly, within Chula Vista. The temporal and physical extent of the adverse effects is very limited. The DEIR found that the Proposed Project would have less than significant impacts within the following 11 resource areas: Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Public Services, Transportation and Traffic, and Utilities and Service Systems. DEIR p. 6-3 to -4. It found that there would be no impact on Land Use and Planning. DEIR p. 6-4.

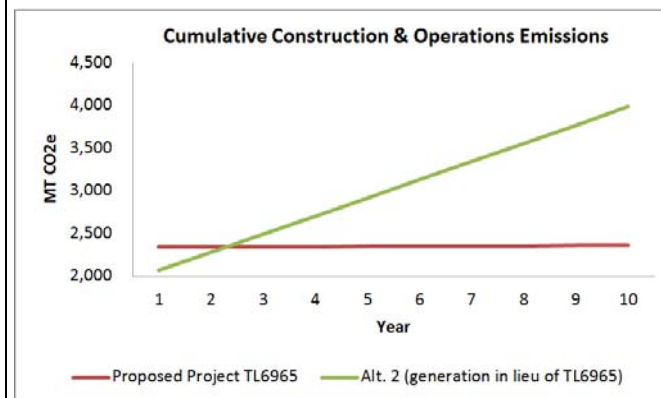
There were only three areas in which the Proposed Project would have significant and unavoidable impacts, and these would only be temporary: Aesthetics, Noise, and Recreation. DEIR p.6-3 to -4. The Aesthetics and Recreation impacts would become less-than-significant within five years (DEIR 4.1-24 to -48; 4.13-10 to -11; 6-5), and the Noise impact would end as soon as construction ends, within 18-24 months (DEIR 4.11-26 to -29; 6-5).

B1-59

The benefits of the Proposed Project would extend in perpetuity, long after the significant impacts had ended. The project's benefits outweigh the policy of reducing or avoiding significant environmental impacts of the project.

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
					Existing Language	Revised Language
2 – Project Description						
B1-60	2.2.2	2-2		SDG&E respectfully requests that the second project objective identified in Section 2.2.1 be retained in Section 2.2.2, Basic Project Objectives. This project objective provides for three 69-kV circuits into the proposed substation to serve load growth in the region and meet regulatory requirements. As thoroughly explained below in the Alternatives Section and the accompanying narrative, SDG&E believes the third power line will best meet long-term reliability needs.		Provide three 69-kV circuits into the proposed substation to serve load growth in the region and meet the regulatory requirements of the North American Electric Reliability Corporation (NERC), Western Electric Coordinating Council (WECC) and California Independent System Operator (CAISO)
B1-61	2.5	2-7	Table 2.5-1	In the Draft EIR Table 2.5-1, the project disturbance calculations for the substation and TL 6965, permanent work pads/modified access roads, and poles/work areas are substantially larger than SDG&E has estimated. In August 2014, SDG&E provided comments to the CPUC on the draft Project Description requesting clarification on the temporary and permanent project disturbance calculations for TL 6965. SDG&E maintains that its disturbance calculations are correct, and renews its request for clarification on the project disturbance calculations provided in the Draft EIR.		
B1-62	2.7	2-29, 2-30	Table 2.7-1	The numbers for substation cut and fill included in the first section of Table 2.7-1 of the Draft EIR were derived from data request DR.16.2 (October 2014). These numbers are raw cut and fill and do not include the theoretical over-excavation and contingency volumes included in the numbers provided in the draft PEA and subsequent data requests. To clarify, SDG&E estimates total cut and fill (including over-excavation and contingency) for the substation and access road to be approximately 90,000 CY cut and 138,000 CY fill. Similarly, the numbers for structural fill and class II aggregate on page 2-29 should be revised to reflect over-excavation and contingency and redistribution of 4,000 CY (cut) from the adjacent underground loop-in from the fifth row of Table 2.7-1.	Up to approximately 21,600 cubic yards (CY) of structural fill and class 2 aggregate would be imported for construction. A summary of the anticipated grading quantities for the proposed substation is provided in Table 2.7-1.	<i>The EIR should be revised to update the numbers in the first row of Table 2.7-1 to replace 61,600 (cut) with 89,800 and 83,100 (fill) with 137,100.</i> Proposed change on page 2-29: Up to approximately 21,600 <u>44,000</u> cubic yards (CY) of structural fill and class 2 aggregate would be imported for construction.
B1-63	2.7.16	2-49	1 st paragraph below Table 2.7-7	The Draft EIR correctly identifies that standard daytime construction hours are Monday through Friday 7AM-7PM and Saturday 8AM-7PM. However, should it become necessary to meet project in-service needs, construction on Sundays may be performed consistent with the City of Chula Vista Municipal Code which permits construction on Sundays.	Standard daytime construction hours for the proposed project would be Monday through Friday, 7 AM to 7 PM, and 8 AM to 7 PM on Saturday.	Standard daytime construction hours for the proposed project would be Monday through Friday, 7 AM to 7 PM, and 8 AM to 7 PM on Saturday. Should it become necessary to meet project in-service needs, construction on Sundays may be performed consistent with the City of Chula Vista Municipal Code that allows construction on Sundays.

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B1-64	5.	2.7.6	2-39	Grounding Rods section	The EIR should be revised to clarify that a minimum of two grounding rods would be required to meet design requirements.	All steel poles would require two grounding rods and a copper ground wire connecting the steel pole to the rods.	All steel poles would require <u>a minimum of</u> two grounding rods and a copper ground wire connecting the steel pole to the rods.
B1-65	6.	2.7.7	2-39	Conductor Installation	The Draft EIR states that mesh netting would be installed at crossings of SR-125. This statement should be revised to reflect multiple options utilized during conductor installation crossing freeways.	Temporary guard structures and mesh netting would be installed at crossings of SR-125 to ensure safety during conductor installation.	Temporary guard structures and mesh netting would be installed at crossings of SR-125. <u>SDG&E, the construction contractor and Caltrans will collaborate to determine appropriate methods to ensure safety during conductor installation over SR-125. Typical methods include short periods of stopping traffic, guard structures or mesh netting.</u>
B1-66	7.	2.6.2	2-28	Alternating Current Features	SDGE Gas Engineering will be removing the 4 inch gas line from service over the next two years (approximately). This will probably result in fewer AC features (i.e. likely no reason to mitigate induced AC current effects on the 4 inch gas line). SDG&E would have ARK Engineering revise the induced AC current study and proposed AC features to re-evaluate the effects of AC current and the need for features.	The proposed TL 6965 power line would be located within proximity of two SDG&E gas pipelines: a 36-inch-diameter pipeline and a 4-inch-diameter pipeline.	The proposed TL 6965 power line would be located within proximity of two SDG&E gas pipelines: a 36-inch-diameter pipeline and a 4-inch-diameter pipeline. <u>SDG&E anticipates the 4-inch-diameter pipeline will be removed within approximately two years. If the pipeline is to be in place at the time of energization of TL 6965, the following AC features for the 4-inch-diameter gas line will be installed.</u>
3 – Alternatives							
B1-67	8.	3.4.2 69/12 kV sub with no new line (gen)	3-11+	General Comment	Alternative 2 proposes the approval of a 69/12 kV substation and utilizing generation at the Border and Larkspur Electric Generating Facilities in lieu of the new TL6965 power line from the Salt Creek Substation to the existing Miguel substation. Utilizing generation will result in higher cumulative emissions (metric tons CO ₂ e) during the third year of operation (see chart below); the proposed TL6965 is a better option from a reduced emissions perspective.	See DEIR	<u>The general comments to the left are in response to the CPUC's choice of Alternative 2 as the Environmentally Superior alternative.</u>



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B1-67 (cont.)				<p>SDG&E does not have a Power Purchase Agreement (PPA) with Larkspur or CalPeak Border; therefore energy is not purchased directly from them except for that blended with CAISO energy products. SDG&E has a Resource Adequacy (RA) contract (capacity) with CalPeak Border which is not designed for energy transactions. These units do not directly sell energy to SDG&E – they instead sell to the CAISO who delivers power at Locational Marginal Pricing (LMP) prices to wholesale buyers like SDG&E and others in the network.</p> <p>These generation units were commissioned in 2001 and likely have a book-life of 25 years; SDG&E feels it reasonable to assume that the generators will be in service for as much as 4 years beyond the book-life so it is possible that they have approximately 15 years of remaining life. The second Miguel to Salt Creek line TL6965 will likely be required when a third transformer bank is installed within what then will be the existing Salt Creek Substation. Timing for this third transformer bank is tentatively forecast between eight to ten years from now, in order to improve operational flexibility and reduce the inadvertent outage risk to customers. Given the potential retirement of the CTs in 15 years and the third line TL6965 likely being needed within a ten year window, SDG&E recommends approval of the project as proposed (a 69/12 kV substation with a loop-in of TL6910 and installation of the new TL6965).</p> <p>CAISO detected a reliability concern (like a transmission contingency) that might be relieved by using greater generation from any of these units yet nonetheless approved the second power line (TL6965) in the CAISO 2014-2015 Transmission Plan. With there only being a loop-in of TL6910 to the Salt Creek Substation, a NERC CAT B (G-1/N-1 or N-1) thermal overload exists on another power line (TL649) due to the loss of TL6965. In other words, under heavy summer loading conditions, TL649 will overload if there is no generation available at Border and TL6965 is out of service. Potential causes for the generation being unavailable include generators having exceeded their emissions limits, gas curtailment (there is only a single line serving the majority of the gas load in San Diego), or generators being out of service for</p>		

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B1-67 (cont.)				<p>maintenance or equipment failures. Furthermore, acute failures that lead to the loss of a power line will not allow sufficient time to bring generation online and thus could lead to a loss of load at Salt Creek Substation depending on customer demand at the time. Finally, generation would not be beneficial in the event both feeds to Salt Creek were lost (N-1-1). An outage of TL6965, followed by loss of TL649, will result in loss of all load at Salt Creek as well as loss of any generation at Border. Addition of the second Salt Creek-Miguel line (TL 6965) will prevent loss of Border generation and loss of load in the event of this contingency. Note also that the overload potential will continue to worsen as the load at Salt Creek grows. Therefore SDG&E strongly renews its request to build Salt Creek with three feeds as originally proposed so as to meet reliability needs of the area, independent of the higher-emitting local generation involved in Alternative 2.</p>		
B1-68	3.4.1	3-7+	General Comment	<p>Reliability is compromised with the 230/12kV alternative (Alternative 1) due to the non-standard 230/12kV transformer and having two transmission lines feeding the substation. If one of the transformers is out of commission, the entire substation would then depend on one transformer until the spare is connected. Another concern is that if one of the 230kV transmission lines feeding the 230/12 kV substation has a fault, then the substation utilization would be compromised. With the proposed 69/12 kV substation and the addition of the proposed new 69 kV power line there will be three transmission sources serving the Salt Creek substation to provide a reliable distribution substation design.</p> <p>There are no existing 230/12 kV substations in the SDG&E system, so this unique design would require new design and engineering. Repair and maintenance would be costly and time consuming.</p> <p>The visual impacts of constructing a 230/12kV substation would be substantially greater than the proposed 69/12kV substation since it would require taller substation structures and larger cable poles to loop in the 230kV transmission line. At the CPUC Draft EIR informational meeting on June 4, 2015, concerns were raised regarding the visibility of the substation from nearby residents. Given the increased visual impacts and reduced reliability,</p>		

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B1-68 (cont.)				SDG&E recommends not implementing this alternative. Instead, the proposed project is still considered by SDG&E to be the best option to meet project objectives.		
4.1 – Aesthetics						
B1-69	Aesthetics	Multiple		The Draft EIR identifies significant impacts to the “future Otay Valley Regional Park Trail” and “future University Village.” Impacts to viewers from a future development is should not be evaluated under CEQA, as the baseline condition is based upon the physical environmental conditions at the time of the Notice of Preparation (NOP). The currently existing access road is only informal and while it may be proposed as a part of the formal trail system, no formal trail easements or other improvements have been made. Impacts to recreational trail users on the utility access road/informal trail and impacts to people within the future University Village should not be considered in the Draft EIR or found to be significant. Please see Section III.E in the attached narrative for a full discussion of this issue.		Revise conclusion page ES-31 Revise conclusion page ES-32 Revise conclusion page 4.1-31 Revise conclusion page 4.1-37 Revise conclusion page 4.1-48 Revise conclusion page 4.1-64 Revise conclusion page 4.1-68
4.3 – Air Quality						
B1-70	4.3.2	4.3-10	Bullet #3	“Regulation IV, Rule 68, Fuel-Burning Equipment-Oxides of Nitrogen” reference would only apply should Alternative 2 be the option selected.	Regulation IV, Rule 68, Fuel-Burning Equipment – Oxides of Nitrogen: Rule 68 regulates NOx emissions from non-vehicular, fuel-burning equipment with a maximum heat rating of 50 million British Thermal Units or more.	For Alternative 2 Only – Regulation IV, Rule 68, Fuel-Burning Equipment-Oxides of Nitrogen: Rule 68 regulates NOx emissions from non-vehicular, fuel-burning equipment with a maximum heat rating of 50 million British Thermal units or more.
B1-71	APM AIR-1	4.3-10	Table 4.3-5	The following sentence in the CPUC APM “All earth-moving or excavation activities that create visible dust will be discontinued to limit fugitive dust from leaving the project site,” should be replaced with the more accurate language from the PEA, “All earthmoving or excavation activities shall be discontinued during period of high winds (i.e., greater than 25 mph) to prevent excessive amounts of fugitive dust generation.”	Dust Control: All unpaved demolition and construction areas will be wetted as needed to reduce fugitive dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements. All earthen material transported off site will be secured by covering or use of at least 2 feet of freeboard to avoid carry-over. All earth-moving or excavation activities that create visible dust will be discontinued to limit fugitive dust from leaving the project site.	Dust Control: All unpaved demolition and construction areas will be wetted as needed to reduce fugitive dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements. All earthen material transported off site will be secured by covering or use of at least 2 feet of freeboard to avoid carry-over. All earth-moving <u>earthmoving</u> or excavation activities that create visible dust will shall <u>be discontinued to limit during period of high winds (i.e., greater than 25 mph) to prevent excessive amounts of fugitive dust from leaving the project site, generation.</u>
4.4 – Biological Resources						
B1-72	4.4 BIO Mitigation	Various		Mitigation Measures Biology-1, Biology-2, Biology-8, Biology-10, and Biology-11 are only applicable if SDG&E cannot rely on its approved or amended NCCP.		<i>Insert:</i> Should SDG&E be unable to rely upon its approved or

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B1-72 (cont.)				Please add qualifying sentence to each of these measures, such as “Should SDG&E be unable to rely upon its approved NCCP, then SDG&E shall implement the following Mitigation Measure.”		amended NCCP, then SDG&E shall implement the following Mitigation Measure.” at the beginning of Mitigation Measures Biology-1, Biology-2, Biology-8, Biology-10, and Biology-11.
B1-73	MM BIO-1	9-12	Monitoring/ Reporting Requirement	Under the monitoring and reporting requirements section of Mitigation Measure Biology-1, the CPUC would require training for “staff” at least 30 days prior to the start of construction. The mitigation measure itself appropriately specifies construction crews. The 30-day requirement in the APM was intended only for the training materials. As construction crews arrive a few days or a week prior to construction and crews and personnel on the project change daily, environmental training would need to occur regularly throughout construction. SDG&E requests revisions to the monitoring/reporting requirements section of this measure.	SDGE: Conduct environmental training for staff at least 30 days prior to the start of construction and submit a copy of the training materials to the CPUC.	SDGE: Conduct environmental training for staff at least 30 days prior to the start of construction and personnel conducting work on the project, and submit a copy of the training materials to the CPUC
B1-74	Noise APM Noise-3	4.11-12	APM	APM Noise-3 was revised by the CPUC to require approval by the City and County of construction activities outside of the permissible local construction hours. Although local governments do not have the power to regulate activities related to electric power line facilities, the CPUC encourages, and SDG&E participates in, cooperative discussions with affected local governments to address their concerns where feasible. However, SDG&E does not obtain noise permits or variances from local agencies and no approval is required. Therefore, SDG&E requests that “meet and confer” replace “obtain approval” in this measure.	APM Noise-3: If construction activities are required outside of the permissible local construction hours, SDG&E will obtain approval from the City of Chula Vista and the County of San Diego prior to conducting construction outside the permitted hours.	APM Noise-3: If construction activities are required outside of the permissible local construction hours, SDG&E obtain approval from <u>will meet and confer with</u> the City of Chula Vista and the County of San Diego prior to conducting construction outside the permitted hours.
B1-75	MM BIO-1	9-12	APM/MM	This measure is duplicative of APM BIO-2. The duplicative language in DEIR APM BIO-1 should be deleted. Measures that are satisfied by other APMs and/or mitigation measures should also be deleted. This will streamline implementation without affecting overall compliance. 1. This measure is satisfied through SDG&E’s NCCP Operational Protocol (Section 7.1.1,1) and as included in SDG&E’s PEA Project Design Feature as carried through in the DEIR APM BIO 1. 2. This measure is satisfied through SDG&E’s NCCP Operational Protocol (Section 7.1.1,2) and as included in SDG&E’s PEA Project Design Feature as carried through	SEE DEIR Section 9 MMRP for complete text.	1. Vehicles must be kept on access roads. A 15-mile per-hour speed limit shall be observed on dirt access to allow for reptile species to disperse. Vehicles must be turned around in established or designated areas only. 2. No wildlife, including rattlesnakes, may be harmed, except to protect life and limb. 3. Firearms shall be prohibited on the right-of-way except for those used by security personnel 4. Feeding of wildlife is not allowed. 5. SDG&E personnel are not allowed to bring pets on the rights-of-way in order to minimize harassment or

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B1-75 (cont.)				<p>in the DEIR APM BIO 1.</p> <p>3. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,3).</p> <p>4. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,4) and as included in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>5. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,5) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>6. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,7) and as included in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>7. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,8) and as included in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>8. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,9) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1. This measure is further satisfied by APM Haz 3 and MM Haz 2.</p> <p>9. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,10) and as included in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p><i>Pre-activity Surveys</i></p> <p>12. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,13) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1. This preactivity survey report will be submitted to the CPUC concurrently when submitted to the CDFW and USFWS in accordance</p>		<p>killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations.</p> <p>6. Plant or wildlife species may not be collected for pets or any other reason.</p> <p>7. Littering is not allowed. SDG&E shall not deposit or leave any food or waste on the rights of way or adjacent property.</p> <p>8. Wild Fires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, it may be necessary for trucks to carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care should be exhibited when smoking in natural habitats.</p> <p>9. Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impact to the Qualified Biologist. Additional biologists or experts in wildlife handling may need to be brought in by the Qualified Biologist for assistance with wildlife relocations.</p> <p><i>Qualified Biologist</i></p> <p>10. San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities for the project. Monitors shall be responsible for pre-activity surveys, work area delineations (i.e., staking, flagging, etc.) to comply with the mitigation measures in this EIR including on-site monitoring and documentation of</p>

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B1-75 (cont.)				with the NCCP.		violations and compliance.
				13. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,14) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.		<i>Training</i>
				14. This measure has already been satisfied through conducting the various resource assessment surveys which also include research of known population and were incorporated into the Biological Technical Report. Therefore; it is not necessary to have a standalone measure. Any additional data collected until the end of project completion will be maintained in the project documents and in internal SDG&E GIS System.		11. An environmental training program shall be developed and presented to all crew members prior to the beginning of all project construction. The training shall describe special-status plant and wildlife species and sensitive habitats that could occur within project areas, protection afforded to these species and avoidance and minimization measures required to avoid and/or minimize impacts from the project. Penalties for violations of environmental laws shall also be incorporated into the training session. Each crewmember shall be provided with an informational training handout and a decal to indicate that he/she has attended the training. The roles and responsibilities of the CPUC approved biologists and other environmental representatives shall be identified in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and discussed during the training. All new construction personnel shall receive this training before beginning work on this project. A copy of the training and training materials shall be provided to CPUC for review and approval at least 30 days prior to the start of construction. Training logs and sign-in sheets shall be provided to CPUC on a monthly basis. As needed, in-field training shall be provided to new on-site construction personnel by the environmental compliance supervisor or a qualified individual who shall be identified by the Qualified Biologist, or initial training shall be recorded and replayed for new personnel.
				16. This measure is from the NCCP Operational Protocols (Section 7.1.1,17) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.		
				17. This measure is from the NCCP Operational Protocol (Section 7.1.1,19). This measure is also satisfied through APM Hydro-1, APM Hydro-2, and MM Geo-1. Thus this additional and redundant measure is not necessary to maintain less than significance.		
				18. This measure is from the NCCP Operational Protocol (Section 7.1.1,20). This measure is also satisfied through APM Hydro-1, APM Hydro-2, and MM Geo-1. Thus this additional and redundant measure is not necessary to maintain less than significance.		
			20. This measure is similar and adapted from NCCP Operational Protocols (Section 7.1.1,22) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project. Any project-related construction activities conducted within a jurisdictional waterbody will be conducted in accordance with issued permits from the appropriate resource agency.			
			21. This measure is from the NCCP Operational Protocols (Section 7.1.1,23). As stated in the DEIR (ES-2) "The			
					<i>Pre-activity Surveys</i>	
					12. The Qualified Biologist shall conduct a preactivity survey for all activities occurring off of access roads in natural areas. The pre-activity survey will be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-activity survey will be documented by the Qualified Biologist in a pre-activity survey report. The pre-activity survey report will be submitted to the CPUC for review and approval and the results shall be	

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B1-75 (cont.)				<p><i>preliminary project design avoids impacts to waters of the state and waters of the U.S. The need for these permits will be determined during final design</i>". This mitigation measure would be satisfied by compliance with applicable water permitting if permitting shall become necessary and thus this standalone mitigation measure is not needed.</p> <p>22. This measure is from the NCCP Operational Protocol (Section 7.1.1,21) and is not applicable as the project footprint has been identified, analyzed and delineated through the EIR process.</p> <p>23. This measure is from the NCCP Operational Protocol (Section 7.1.1,21) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>24. This measure is from the NCCP Operational Protocols (Section 7.1.1,26) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.</p> <p>25. "Brush clearing around facilities for fire protection shall not be conducted from March through August without prior approval by the Qualified Biologist. The Qualified Biologist will make sure that the habitat contains no active nests, burrows, or dens prior to clearing." This portion of the measure is from the NCCP Operational Protocols (Section 7.1.1,27) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.</p> <p>The remainder of the measure is from the NCCP Operational Protocols (Section 7.1.1,28) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>27. This measure is from the NCCP Operational Protocols (Section 7.1.1,30) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.</p>	<p>submitted to CDFW and USFWS as required by any other regulatory permits or approvals.</p> <p>The pre-activity study report will include the following:</p> <ul style="list-style-type: none"> • Type, location, and size of project • Date, time, weather, surrounding land uses • Evaluation of type and quality of habitat • Work description and methods which will be used to avoid or minimize ground disturbance, including biological monitoring during construction • Anticipated impacts and proposed mitigation • Map of location of work area <p>In those situations where the Qualified Biologist cannot make a definitive species identification, the Qualified Biologist shall make a determination based on the available evidence and professional expertise</p> <p>13. In order to ensure that habitats are not inadvertently impacted, the Qualified Biologist shall determine the extent of habitat and flag boundaries of habitat which must be avoided. When necessary, the Qualified Biologist should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the Qualified Biologist shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project specific basis.</p> <p>14. SDG&E will maintain a library of rare plant locations known to SDG&E occurring within the project area. "Known" means a verified population, either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency Habitat Conservation Plans, pre-activity surveys, or biological surveys conducted for environmental compliance on project site (e.g. initial study), but there is no requirement for development of original biological data. Plant inventories shall be consulted as part of pre-activity survey procedures</p>	

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B1-75 (cont.)				<p>28. This measure is from the NCCP Operational Protocols (Section 7.1.1,31) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.</p> <p>29. This measure is similar and adapted from NCCP Operational Protocols (Section 7.1.1,32) and pertains to specific geographic locations determined by SDG&E and the signatories of the NCCP to be ESA's. In addition, this measure will be satisfied through compliance with Mitigation Measure Bio-6 in the DEIR and is not necessary here.</p> <p>31. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,35) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>32. This measure is from the NCCP Operational Protocols (Section 7.1.1,36) and pertains to activities performed once the facility has been built and is operational and is not applicable for the construction phase of this project.</p> <p>33. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,37) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>34. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,38) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>35. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,39) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1. This measure is further satisfied by APM Air-1 and MM Air-1.</p> <p>46. This measure is satisfied through SDG&E's NCCP Operational Protocol (Section 7.1.1,50) and as summarized in SDG&E's PEA Project Design Feature as carried through in the DEIR APM BIO 1. This measure is further satisfied by Mitigation Measure Bio-6 in the DEIR</p>		<p><i>Maintenance, Repair, and Construction of Facilities</i></p> <p>15. Maintenance, repair and construction activities shall be designed and implemented to minimize new disturbance, erosion on manufactured another slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.</p> <p>16. Routine maintenance of all Facilities includes visual inspections on a regular basis, conducted from vehicles driven on the access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot, or from the air.</p> <p>17. Erosion will be minimized on access roads another locations primarily with water bars. Theater bars are mounds of soil shaped to direct flow and prevent erosion. 18. Hydrologic impact will be minimized through the use of state of the art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by us of Best Management Practices.</p> <p>18. Hydrologic impact will be minimized through the use of state of the art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by us of Best Management Practices.</p> <p>19. When siting new facilities, every effort will be made to cross the wetland habitat perpendicular to the watercourse, spanning the watercourse to minimize the amount of disturbance to riparian area.</p> <p>20. During repair or maintenance of facilities in streambed, water may be temporarily diverted as long as the natural drainage patterns are restored after disturbance to minimize the impact of the disturbances and help to reestablish or enhance the native habitat.</p>

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B1-75 (cont.)				<p>and thus not needed.</p> <p>48. This measure is satisfied through SDG&E’s NCCP Operational Protocol (Section 7.1.1,52) and as summarized in SDG&E’s PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>49. This measure is satisfied through SDG&E’s NCCP Operational Protocol (Section 7.1.1,53) and as included in SDG&E’s PEA Project Design Feature as carried through in the DEIR APM BIO 1.</p> <p>50. This measure is satisfied by Mitigation Measure Bio-6 in the DEIR and thus not needed.</p> <p>51. This measure is satisfied by Mitigation Measure Bio-6 in the DEIR and thus not needed.</p> <p><i>“Compensatory Mitigation and Habitat Enhancement Measures”</i></p> <p>This portion of the measure should be a separate measure as it potentially has unrelated timing for submittals and approvals and is also not considered an “operation protocol”. Separating it out will allow for better tracking of compliance and better implementation.</p> <p>See comment #17 for suggested revisions.</p>		<p>Erosion control during construction in streambed in the form of intermittent check dams and culverts should also be considered to prevent alteration to natural drainage pattern and prevent siltation.</p> <p>21. Impact to wetlands shall be minimized by avoiding pushing soil or brush into washes or ravines.</p> <p>22. During work on facilities, all trucks, tools, and equipment should be kept on existing access roads or cleared areas, to the extent possible.</p> <p>23. Qualified Biologist must approve of an activity prior to working in any sensitive area where disturbance to habitat may be unavoidable.</p> <p>24. Insulator washing is allowed from access roads if other applicable protocols are followed.</p> <p>25. Brush clearing around facilities for fire protection shall not be conducted from March through August without prior approval by the Qualified Biologist. The Qualified Biologist will make sure that the habitat contains no active nests, burrows, or dens prior to clearing. In the event SDG&E identifies a special status plant within a 10-foot radius around power poles, which is the area required to be cleared for fire protection purposes, SDG&E shall notify USFWS (for ESA listed plants), and CDFW (for CESA listed plants), in writing, of the plant’s identity and location and of the proposed Activity, which will result in a Take of such plant. Notification will occur ten (10) working days prior to such Activity, during which time USFWS or CDFW may remove such plant(s). If neither USFWS nor CDFW have removed such plant(s) with the ten (10) working days following the notice, SDG&E may proceed to complete its fire clearing and cause a Take of such plant(s) consistent with SDG&E’s take coverage for the ESA or CESA listed plants. When fire clearing is necessary in instances other than around power poles, and the potential for impacts to special status species exist, SDG&E will follow the pre-activity study and notification procedures in number 12, above.</p>

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B1-75 (cont.)						<p>26. Wire stringing is allowed year round in sensitive habitats if conductor is not allowed to drag on ground or in brush and vehicles remain on access roads.</p> <p>27. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes.</p> <p>28. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the Qualified Biologist or used immediately to fill eroded areas. Cleared vegetation shall be hauled off the rights of way to a permitted disposal location.</p> <p>29. The Qualified Biologist should be contacted to perform a pre-activity survey when trimming is planned in environmentally sensitive areas. Whenever possible, trees will be scheduled for trimming in the non-breeding season.</p> <p>30. If any previously unidentified dens, burrows, or plants are located on any project site after there-activity survey, the Qualified Biologist shall be contacted. Qualified Biologist will determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc. The Qualified Biologist shall report the dens, burrows, or plants to the CPUC and describe the method for avoidance and minimization of the resource consistent with the APMs and mitigation measures in this EIR.</p> <p>31. The Qualified Biologist shall conduct monitoring as recommended in the pre-activity survey report. At completion of work, the Qualified Biologist shall check to verify compliance; including observing that flagged area have been avoided and that reclamation has been properly implemented. Also at completion of work, the Qualified Biologist is responsible for removing all habitat flagging from the Construction site.</p>

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B1-75 (cont.)						<p>32. The Qualified Biologist shall conduct checks on mowing procedures, to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than 4 inches.</p>
						<p>33. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected or from which animals could not be removed shall be capped or otherwise covered at the end of each work day. Old piping or other supplies that have been left open shall not be capped until inspected and any species found in it allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by CDFW.</p>
						<p>34. All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife are located in the trench or excavation, the Qualified Biologist shall be called immediately to remove them if they cannot escape unimpeded.</p>
						<p>35. Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth moving, excavation or other construction activities will be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour.</p>
						<p>36. Before using pesticides in areas where burrowing owls may be found, a pre-activity survey will be conducted.</p> <p><i>Maintenance of access roads shall consist of:</i></p> <p>37. Repair erosion by grading, addition of fill, and</p>

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B1-75 (cont.)						compacting. In each case of repair, the total area of disturbance shall be minimized by careful access and use of appropriately sized equipment. Repairs shall be done after preactivity surveys conducted by the Qualified Biologist and in accordance with the recommendations regarding construction monitoring and relevant protocols. Consideration should be given to source of erosion problem, when source is within SDG&E control.
						38. Vegetation control through grading should be used only where the vegetation obscured the inspection of facilities, access may be entirely lost or the threat of Facility failure or fire hazard exists. The graded access road area should not exceed 12-foot-wide on straight portions (radius turns may be slightly wider).
						39. Mowing habitat can be an effective method for protecting the vegetative understory while at the same time creating access to a work area. Mowing should be used when permanent access is not required since, with time, total revegetation is expected. If mowing is in response to a permanent access need, but the alternative of grading is undesirable because of downstream siltation potential, it should be recognized that periodic mowing will be necessary to maintain permanent access.
						40. Maintenance work on access roads should not expand the existing road bed.
						41. Material for filling in road ruts should never be obtained from the sides of the road, which contain habitat, without approval from Qualified Biologist.

Construction of new access roads shall comply with the following:

42. SDG&E access roads will be designed and constructed according to the SDG&E Guide for Encroachment on Transmission Rights-of-Way (4/91).

43. Access roads will be made available to managers of

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B1-75 (cont.)						<p>the regional preserve system subject to coordination with SDG&E.</p> <p>44. New access roads shall be designed to be placed in previously disturbed areas and areas which require the least amount of grading insensitive areas during construction whenever possible. Preference shall be given to the use of stub roads rather than lining facilities tangentially.</p> <p>45. SDG&E will consider providing access control on access roads leading into the regional preserve system where such control provides benefit to sensitive resources.</p> <p>46. New access road construction is allowed year-round. Every effort shall be made to avoid constructing roads during the nesting season. During the nesting season, the presence or absence of nesting species shall be determined by a biologist and appropriate avoidance and minimization recommendations followed.</p> <p><i>Construction and Maintenance of Access Roads through Stream Beds</i></p> <p>47. Construction of new access roads through streambeds requires a Streambed Alteration Agreement from CDFW and/or consultation with the Army Corps of Engineers.</p> <p>48. Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filing for access purposes in waterways is allowed without the installation of appropriately sized culverts. The use of geotextile matting should be considered when it would protect wetland species.</p> <p>49. Staging/storage area for equipment and materials shall be located outside of riparian area.</p> <p><i>Survey Work</i></p> <p>50. Brush clearing for foot path or line of sight cutting is not allowed from March through August insensitive</p>

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(cont.)

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						<p>habitats without prior approval from the Qualified Biologist, who will ensure the brush clearing activity, does not adversely affect sensitive species.</p> <p>51. SDG&E survey personnel must keep vehicles on existing access roads. No clearing of brush for panel point placement is allowed from March through August without prior approval from the Qualified Biologist.</p> <p>52. Hiking off roads or paths for survey data collection is allowed year round so long as other protocols are met.</p> <p><i>Emergency Repairs</i></p> <p>53. During a system emergency, unnecessary carelessness which results in environmental damage is prohibited.</p> <p>54. Emergency repair of facilities is required in situations which potentially or immediately threaten the integrity of the SDG&E system, such as pipe leaks or downed lines, slumps, slides, major subsidence, etc. During emergency repairs this mitigation measure shall continue to be followed to fullest extent possible.</p> <p>55. Once the emergency has stabilized, any unavoidable environmental damage will be reported to the Qualified Biologist by the foreman. The Qualified Biologist will develop a mitigation plan and ensure its implementation is consistent with this mitigation measure.</p> <p><i>Compensatory Mitigation and Habitat Enhancement Measures</i></p> <p>SDG&E will provide compensatory mitigation for temporary and permanent impacts to vegetation communities caused by the proposed project. SDG&E will follow the guidelines in Sections 7.2 and 7.4 of the NCCP dated 1995. SDG&E shall provide CPUC with evidence of available habitat mitigation lands for project temporary and permanent impacts to vegetation communities at least 30 days prior to the start of</p>

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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B1-75 (cont.)						construction. If SDG&E proposes to conduct on-site habitat enhancement activities in lieu of preservation of habitats within a mitigation bank, SDG&E shall submit a habitat enhancement plan to CPUC at least 30 days prior to the start of construction for CPUC review and approval. At a minimum, the habitat enhancement plan must demonstrate the enhancement of vegetation communities impacted by the project, define the methods used to enhance the habitat, and include monitoring for 5 years and until success criteria are met. Success criteria for habitat enhancement will include improving degraded habitats at a minimum of a 2:1 ratio for vegetation communities impacted by the project.
B1-76	MM Bio-1	9-20	APM/MM Column	<p>Compensatory Mitigation and Habitat Enhancement Measures discussion should be a separate measure as this potentially has unrelated timing for submittals and approvals and is also not considered an “operation protocol”. Separating it out will allow for better tracking of compliance and better implementation.</p> <p>In addition, the measure requires 5 years of monitoring which is inconsistent with the enhancement program as described by the NCCP. Revisions are proposed to make the enhancement program consistent with the NCCP requirements.</p>	<p>SDG&E will provide compensatory mitigation for temporary and permanent impacts to vegetation communities caused by the proposed project. SDG&E will follow the guidelines set in Sections 7.2 and 7.4 of the NCCP dated 1995. SDG&E shall provide CPUC with evidence of available habitat mitigation lands for project temporary and permanent impacts to vegetation communities at least 30 days prior to the start of construction. If SDG&E proposes to conduct on-site habitat enhancement activities in lieu of preservation of habitats within a mitigation bank, SDG&E shall submit a habitat enhancement plan to CPUC at least 30 days prior to the start of construction for CPUC review and approval. At a minimum, the habitat enhancement plan must demonstrate the enhancement of vegetation communities impacted by the project, define the methods used to enhance the habitat, and include monitoring for 5 years and until success criteria are met. Success criteria for habitat enhancement will include improving degraded habitats at a minimum of a 2:1 ratio for vegetation communities impacted by the project.</p>	<p>SDG&E will provide compensatory mitigation for temporary and permanent impacts to vegetation communities caused by the proposed project. SDG&E will follow the guidelines set in Sections 7.2 and 7.4 of the NCCP dated 1995. SDG&E shall provide CPUC with evidence of available habitat mitigation lands for project temporary and permanent impacts to vegetation communities at least 30 days prior to the start of construction. If SDG&E proposes to conduct on-site habitat enhancement activities as defined by the NCCP in lieu of preservation of habitats within a mitigation bank or withdrawal from the existing SDG&E Mitigation Bank, SDG&E shall submit a habitat enhancement plan to CPUC at least 30 days prior to the start of construction for CPUC review and approval. At a minimum, the habitat enhancement plan must demonstrate the enhancement of vegetation communities impacted by the project, define the methods used to enhance the habitat, and include monitoring for 5 up to 3 years and or until success criteria are met. Success criteria for habitat enhancement will include improving degraded habitats at a minimum of a 2:1 ratio for vegetation communities impacted by the project including mitigation ratios will be as defined by the NCCP Enhancement program.</p>
B1-77	BIO-3	9-20, 9-21	MM BIO-3 #1	SDG&E is proposing revisions to this mitigation measure to ensure the most practicable and effective implementation, which is to limit the introduction and spread of target weed species as well as control of target	SEE DEIR Section 9 – MMRP for full text	Precautions shall be taken to minimize the introduction and spread of invasive weeds. Weed control shall include the following:

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B1-77 (cont.)				weed species feasibility. It has yet to be determined if any weed species that are rated as High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database occur within the project footprint. It is also not feasible to control or eradicate species within the project footprint, if those species are pervasive throughout the area.		1. Prior to construction, all work areas within SDG&E ROW shall be reviewed for the presence of weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database (http://www.cal-ipc.org/paf/). These plant species shall be <u>mapped and density of occurrence within the project area determined prior to commencement of ground disturbing activities. All Cal-IPC High or Moderate species with limited occurrences within 15-feet of project impact areas shall be</u> treated or mechanically removed prior to construction according to control methods and practices for invasive weed populations designed in consultation with the <u>per</u> California Invasive Plant Council (Cal-IPC) <u>recommendations. Cal-IPC High and Moderate species that are ubiquitous within and adjacent to the project area will only be treated as part of initial project vegetation clearing activities. Ornamental plant species that have been planted within the project area will be excluded from all weed control efforts.</u>
B1-78	BIO-3	9-21	MM BIO-3 #2	Per interactions and communications between SDG&E, San Diego County Agriculture Commissioners Office and Cal-IPC on other SDG&E construction projects, neither the County nor Cal-IPC provides any authorization or consultation as this measure requires. All references to the San Diego County Agriculture Commissioners Office and Cal-IPC providing authorization or consultation need to be removed.	Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the San Diego County Agriculture Commissioner. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Qualified Applicator. Where manual and/or mechanical methods are used, plant debris shall be disposed of in a landfill. Timing of weed control treatment shall be determined for each plant species in consultation with the PCA, the San Diego County Agriculture Commissioner, and Cal-IPC, with the goal of controlling populations before they start producing seeds.	Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the San Diego County Agriculture Commissioner. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Qualified Applicator. Where manual and/or mechanical methods are used, plant debris shall be disposed of in a landfill <u>as appropriate</u> . Timing of weed control treatment shall be determined for each plant species in consultation with the PCA, the San Diego County Agriculture Commissioner, and Cal-IPC, with the goal of controlling populations before they start producing seeds. <u>by the PCA with the goal of or eliminating production of seed or vegetative propagules.</u>
B1-79	BIO-3	9-21	MM BIO-3 #3, 5, 6	Washing of vehicles and equipment before entering and exiting the substation site as a general requirement, regardless of the presence of target Cal-IPC High and Moderate species within the project area, does not meet the intent of this mitigation measure. The intent of this mitigation measure is to prevent the introduction of Cal-		3. Construction vehicles and equipment <u>used for ground disturbing activities</u> shall be <u>washed clean</u> (including wheels, undercarriages, and bumpers) before entering and again before leaving the substation site <u>the first time they enter the project area. Further cleaning will not be required as long as the vehicles stay within</u>

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B1-79 (cont.)				<p>IPC High and Moderate species to the project area and to prevent vehicles and equipment working on the project from being a vector to spread Cal-IPC High and Moderate species to locations outside the project area where they are not present. The true targets of this mitigation measure are weed species not currently present within or adjacent to the project area and those with a limited distribution within the project area. Cal-IPC species that are ubiquitous throughout the project area and San Diego County will not be controlled through implementation of this mitigation measure as written.</p> <p>The most effective way to meet the intent of this mitigation measure is through effective implementation of Item 5 (of this mitigation measure). The most important activities are pre-construction control of weed species with a limited distribution within the project area and effective post-construction monitoring for detection of new weed species. If new species are detected, subsequent control would be important. Washing of vehicles and equipment has some limited value if done thoroughly but it is not a guarantee that the vehicle or equipment is free of weed seeds or vegetative propagules. The activity can also act as a vector to spread target weed species when done onsite through splatter from water particles or failure of the containment system for collecting wash water. Therefore all vehicle and equipment washing, if conducted, should be done at an offsite facility that can effectively contain and dispose of the wash water.</p> <p>This is the most effective manner to ensure target Cal-IPC species do not establish within the project area and are not moved out of the project area.</p> <p>The proposed clarifications are intended to ensure the most effective and ecological approaches for determining plant and seed material for use in landscaping and habitat restoration.</p>	<p><u>the project area for the duration of construction activities. In addition, tools used specifically for vegetation removal activities such as chainsaws, hand clippers, and pruners shall be cleaned to ensure no seed of vegetative propagules are on the e/quipment before entering and again before leaving project areas where Cal-IPC High and Moderate species are present and the species are not ubiquitous in adjacent areas.</u></p> <p>In addition, tools such as chainsaws, hand clippers, and pruners shall be washed /before entering and again before leaving all project areas. 4. All washing shall take place where rinse water 4. All cleaning shall take place in a location where the waste product is collected and disposed of in either a sanitary sewer or landfill. A written daily-log shall be kept by the contractor(s) for all vehicle/equipment/tool washing/cleaning that states the date, time, location, type of equipment washed, methods used, and staff present. The log shall include the signature of a responsible staff member. Logs shall be available to CPUC and wildlife agencies for inspection at any time and shall be submitted to CPUC on a monthly basis during construction.</p> <p>5. From the time construction begins until 2 years after construction is complete, identified and treated populations shall be monitored annually for reestablishment of weeds. <u>project impact areas will be monitored for the presence of weed species that were not present prior to the commencement of construction activities.</u> Treated populations <u>that meet the treatment criteria in Item 1 above</u> that reestablish shall be retreated on an annual basis <u>until the density of the species is at or below its preconstruction level.</u></p> <p>6. Only native plants and seed or ecologically appropriate, non-invasive plants and seed shall be used in proposed project landscaping. A list of all plants and seed mixes proposed <u>anticipated to be used</u> for project landscaping, erosion control, and the revegetation of temporary impact areas shall be provided to CPUC for approval <u>review</u> at least 30 days prior to construction. Plant and seed materials brought to the project site <u>A final list will be provided to the CPUC for approval</u></p>	

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B1-79 (cont.)						<u>once the seed and/or plant material is in the final stages of being secured. This will occur at least 30 days prior to anticipated application/installation. Plant material and/or seed mix shall be field-verified against this list by the CPUC inspector prior to planting and seed mix application.</u>
B1-80	MMRP – Optional Measure Biology-1	9-28	APM/MM Column	Impacts to San Diego Sunflower were determined in the DEIR (page 4.4-34) to be less than significant, therefore mitigation is not required. In addition, planting this species in a landscape area would be inconsistent with potentially utilizing herbicide and in conflict with Mitigation Measure Bio 9. SDG&E recommends deletion of this measure.	Optional Measure Biology-1: To further minimize the construction-related direct impacts to San Diego County sunflower (a species that has limited distribution in California, but is not a federally or state-listed endangered plant), San Diego County sunflower shall be included in the planting/seed mix for revegetation of temporary impacts in suitable habitat areas.	Optional Measure Biology-1: To further minimize the construction-related direct impacts to San Diego County sunflower (a species that has limited distribution in California, but is not a federally or state-listed endangered plant), San Diego County sunflower shall be included in the planting/seed mix for revegetation of temporary impacts in suitable habitat areas.
B1-81	4.4 BIO	4.4-46	MM Bio 4	A habitat assessment for the Hermes Copper butterfly (<i>Lycaena hermes</i>) was conducted over two days by Dr. David Faulkner on behalf of AECOM at the Salt Creek Substation project site (see attached letter report). Surveys were completed to determine suitable habitat within the proposed project footprint plus a 100-foot buffer for the species. Surveys were completed on June 12 and June 16, 2015. No adult Hermes Coppers were seen during the surveys. Larval host plants were located only near the buffer zone of the Salt Creek Substation site (well over 100 feet away from the proposed substation footprint (Figure 1)). Spiny redberry was documented in four locations, three of which contained single plants (Figure 1). One of these individuals is within 100 feet of the transmission corridor. All others are over 100 feet outside of the transmission corridor. Based on the distance from the project area, no impacts to Hermes Copper butterfly are anticipated and mitigation measure Biology-4 will not be required for project implementation.	Mitigation Measure Biology-4: SDG&E shall conduct surveys for Hermes copper butterfly within 1 year prior to project construction activities in suitable habitat. Surveys shall be conducted by a qualified biologist in all suitable habitat areas for Hermes copper butterfly. Suitable habitat areas include any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. Surveys shall follow the “County of San Diego Guidelines for Hermes Copper (<i>Lycaena hermes</i>)” (County of San Diego 2010). Survey results shall be reported to the USFWS and CPUC within 30 days of survey completion and prior to project construction activities.	Mitigation Measure Biology-4: SDG&E shall conduct surveys for Hermes copper butterfly within 1 year prior to project construction activities in suitable habitat. Surveys shall be conducted by a qualified biologist in all suitable habitat areas for Hermes copper butterfly. Suitable habitat areas include any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. Surveys shall follow the “County of San Diego Guidelines for Hermes Copper (<i>Lycaena hermes</i>)” (County of San Diego 2010). Survey results shall be reported to the USFWS and CPUC within 30 days of survey completion and prior to project construction activities.
B1-82	4.4 BIO	4.4-46	MM Bio 5	MM Bio-5 requires mitigation for Hermes. Hermes is a <i>Federal</i> candidate species. However, the US Fish and Wildlife Service is not actively protecting this species and thus these measures are not appropriate. We are being asked to supply Hermes survey reports to and mitigate for (through land purchase) for a species that FWS is not actively protecting at this time. Furthermore, a habitat assessment for the Hermes Copper	Temporary and permanent impacts to Hermes copper butterfly shall be compensated at a ratio of 1:1 for unoccupied habitat and 2:1 for occupied habitat. Habitat compensation shall be accomplished through land preservation or mitigation fee payment for the purpose of habitat compensation for lands supporting Hermes copper butterfly. Land preservation or mitigation fee payment for habitat compensation shall be completed within 18 months of project initiation. Habitat restoration may be appropriate as habitat	Temporary and permanent impacts to Hermes copper butterfly suitable habitat shall be compensated at a ratio of 1:1 for suitable unoccupied habitat and 2:1 for suitable occupied habitat. Habitat compensation shall be accomplished through land preservation or mitigation fee payment for the purpose of habitat compensation for lands supporting Hermes copper butterfly. Land preservation or mitigation fee payment for habitat compensation shall be completed within 24 months of project initiation. Habitat restoration may be

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B1-82 (cont.)				butterfly (<i>Lycaena hermes</i>) was conducted over two days by Dr. David Faulkner on behalf of AECOM at the Salt Creek Substation project site (see attached letter report). Surveys were completed to determine suitable habitat within the proposed project footprint plus a 100-foot buffer for the species. Surveys were completed on June 12 and June 16, 2015. No adult Hermes Coppers were seen during the surveys. Larval host plants were located only near the buffer zone of the Salt Creek Substation site (well over 100 feet away from the proposed substation footprint (Figure 1)). Spiny redberry was documented in four locations, three of which contained single plants (Figure 1). One of these individuals is within 100 feet of the transmission corridor. All others are over 100 feet outside of the transmission corridor. Based on the distance from the project area, no impacts to Hermes Copper butterfly are anticipated and mitigation measure Biology-5 will not be required for project implementation.	compensation provided that the restoration effort is demonstrated to be feasible and is implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the CPUC and permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project shall include long-term management and legal protection assurances.	appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and is implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the CPUC and permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project shall include long-term management and legal protection assurances.
B1-83	4.4 BIO	4.4-57, 4.4-58	MM BIO 6 Page 57 –last paragraph Page 58 – First paragraph	<p>There is no suitable cliff habitat for golden eagle within 1 mile of the project site, and Swainson’s hawk does not nest in the region. Therefore no nest surveys should be required for these species.</p> <p>Surveying for nests within 0.25 mile (0.25 mile = 1, 320 feet) for white-tailed kite is excessive given density of residential and commercial areas surrounding the project. In addition, nesting buffers for non-sensitive passerine are excessive as these species are common and abundant in the geographic area. The proposed project is located in a dense urban environment and is surrounded by residential and commercial development characterized by increased levels of noise and activity from vehicle traffic and human activity in the immediate area. In addition, there is no regulation that supports the requirement for a buffer of this magnitude for non-sensitive passerine species. SDG&E requests that this buffer requirement be removed.</p>	<p>Avoid Impacts on Nesting Birds. During the nesting season (generally between February 15 and August 31, but may be earlier or later depending on species, location, and weather conditions) raptor nests that are located within a 500-foot buffer from a work location and a 1-mile buffer for golden eagle and 0.5-mile buffer for Swainson’s hawk, shall be evaluated by a CPUC-approved qualified biologist to determine whether the raptor nest is active. No trees with active raptor nests shall be removed during nesting season.</p> <p>No additional measures shall be implemented if active nests are more than the following distances from the nearest work areas: (a) 1 mile for golden eagle, (b) 0.5 mile for Swainson’s hawk, (c) 0.25 mile for white-tailed kite, (d) 500 feet for raptors, Coastal California gnatcatcher, and least bell’s vireo, (e) 250 feet for passerine birds in open space areas, or (f) 150 feet for common non-special-status) passerine birds in residential, commercial, and industrial areas.</p>	<p>Avoid Impacts on Nesting Birds. During the nesting season (generally between February 15 and August 31, but may be earlier or later depending on species, location, and weather conditions) raptor nests that are located within a 500-foot buffer from a work location and a 1-mile buffer for golden eagle and 0.5-mile buffer for Swainson’s hawk, shall be evaluated by a CPUC-approved qualified biologist to determine whether the raptor nest is active. No trees with active raptor nests shall be removed during nesting season.</p> <p>No additional measures shall be implemented if active nests are more than the following distances from the nearest work areas: (a) 1 mile for golden eagle, (b) 0.5 mile for Swainson’s hawk, (c) 0.25 mile for white-tailed kite, (d) 500 feet for raptors, Coastal California gnatcatcher, <u>white-tailed kite</u>, and least bell’s vireo, (e) 250-50 feet for passerine birds in open space areas, or (f) 150 feet for common non-special-status) passerine birds in residential, commercial, and industrial areas.</p>
B1-84	Mitigation Measure Biology-6	9-22	Table 9.1.1	The definition of “active nest” is not consistent with the draft regulations’ definition as proposed by the California Department of Fish and Wildlife. This expansive definition creates a significant challenge to field implementation and results in significant cost increases for	Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests, which is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an “active nest” if	Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests which is defined as once <u>using</u> birds begin construction, preparing, ousing a nest for egg-laying or raising young. A nest is no longer an

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B1-84 (cont.)				monitoring nesting activity.	abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest”.	“active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.
B1-85	4.4 BIO	4.4-62, 4.4-63	MM BIO 7	Per DEIR Section 4, Bio Resources Page 4.4-61, western yellow bat is the only Species of Special Concern identified for this project. Therefore, this measure should be revised to be specific to western yellow bat. SDG&E has proposed revisions to this measure to protect western yellow bat during their breeding season, within a 50 foot buffer.	Work Areas. Suitable bat habitat shall be assessed by a CPUC-approved qualified biologist in trees within a 50-foot buffer of active work areas and in structures with suitable bat habitat within a 100-foot buffer of active work areas. If an active roost is found in a tree or structure, the CPUC-approved qualified biologist shall define an appropriate limited or no-work exclusion area surrounding the roosting habitat based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), as well as in consideration of the habitat quality and duration of work-related disturbance. The limited work or exclusion areas shall be approved by CPUC’s independent biologist who shall respond to SDG&E’s request for approval within one business day; if a response is not received, SDG&E may proceed with the implementation of the proposed limited work or exclusion area until CPUC’s independent biologist can review and approve or deny the buffer reduction request.	Work Areas. Suitable <u>western yellow</u> bat habitat shall be assessed by a CPUC-approved qualified biologist in trees within a 50-foot buffer of active work areas and in structures with suitable bat habitat within a 100-foot <u>50-foot</u> buffer of active work areas. If an active <u>yellow bat maternity</u> roost is found in a tree or structure, the CPUC-approved qualified biologist shall define an appropriate limited or no-work exclusion area surrounding theroost based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), as well as in consideration of the habitat quality and duration of work-related disturbance <u>the maternity roost</u> . The limited work or exclusion areas shall be approved by CPUC’s independent biologist who shall respond to SDG&E’s request for approval within one business day; if a response is not received, SDG&E may proceed with the implementation of the proposed limited work or exclusion area until CPUC’s independent biologist can review and approve or deny the buffer reduction request.
B1-86	4.4 BIO	4.4-63	MM BIO 7	See comment 26.	Tree Pruning and Removal. Preconstruction habitat assessments shall be conducted by a CPUC-approved qualified biologist on all trees to be removed that are 10 inches or more in diameter at breast height to identify suitable roosting habitat, within 7 days of the tree removal date. For trees to be removed that provide suitable roosting habitat features, follow-up emergence surveys and acoustic monitoring shall be conducted for 1/2 hour prior to sunset and 1 hour after sunset. If bats are not detected emerging from trees and acoustic activity indicates that no roosting bats are present, no additional measures are required.	Tree Pruning and Removal. Preconstruction habitat assessments shall be conducted by a CPUC-approved qualified biologist on all trees to be removed that are 10 inches or more in diameter at breast height to identify suitable <u>western yellow bat maternity</u> roosting habitat, within 7 days of the tree removal date. For trees to be removed that provide suitable <u>western yellow bat maternity</u> roosting habitat features , follow-up emergence surveys and acoustic monitoring shall be conducted for 1/2 hour prior to sunset and 1 hour after sunset. If bats are not detected emerging from trees and acoustic activity indicates that no roosting bats are present, no additional measures are required.
B1-87	4.4 BIO	4.4-63, 4.4-64	MM BIO 7 Cont.	See comment 26.	If bats are detected emerging from trees or acoustic activity indicates that roosting bats are present, the	If <u>active western yellow bats are detected emerging bat maternity roosts are detected in vegetation to be</u>

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B1-87 (cont.)				<p>potential presence of a maternal colony shall be assessed. If a maternal colony is found in a tree, no work shall occur within 50 feet of the tree.</p> <p>Suitable roost trees shall be removed, to the extent practicable, outside of April to September to avoid impacts to reproductive bats. If vegetation removal activities are conducted during the bat reproductive season the following techniques shall be implemented to passively vacate bats from roosts:</p> <ul style="list-style-type: none"> • Create noise and vibration disturbance on the tree (e.g., concussive hitting with equipment and/or chainsaw cutting) for at least 15 minutes before carefully opening up potential crevices and cavities for inspection and clearance. • If bats may be in a tree hole or heavy branch cavity, attempt to expose them and allow escape. For example, if the cavity cannot be investigated by the CPUC-approved qualified biologist, then carefully cut successive sections above the cavity to open it, waiting up to 10 minutes in between each cut, and determine if it is empty or allow any bats inside to crawl or fly out. <p>Reporting. All bat roosts in trees shall be documented and reported through the MMCRP.</p>	<p>removed, removal will occur outside of April to August, where practicable, to avoid impacts to reproductive bats, from trees, or acoustic activity indicates that roosting bats are present, the potential presence of a maternal colony shall be assessed. If a maternal colony is found in a tree, no work shall occur within 50 feet of the tree. Suitable roost trees shall be removed, to the extent practicable, outside of April to September to avoid impacts to reproductive bats.</p> <p>If vegetation removal activities are conducted during the bat reproductive season the following techniques shall be implemented to passively vacate bats from roosts:</p> <ul style="list-style-type: none"> • Create noise and vibration disturbance on the tree (e.g., concussive hitting with equipment and/or chainsaw cutting) for at least 15 minutes before carefully opening up potential crevices and cavities for inspection and clearance. • If bats may be in a tree hole or heavy branch cavity, attempt to expose them and allow escape. For example, if the cavity cannot be investigated by the CPUC-approved qualified biologist, then carefully cut successive sections above the cavity to open it, waiting up to 10 minutes in between each cut, and determine if it is empty or allow any bats inside to crawl or fly out. <p>Reporting. All <u>confirmed western yellow</u> bat <u>maternity</u> roosts in trees shall be documented and reported through the MMCRP.</p>	
B1-88	4.4 BIO	4.4-64	MM BIO 8	<p>The San Diego desert woodrat is a covered species under the NCCP. In addition, the significance analysis found that significant impacts to desert woodrat would only occur if the project resulted in mortality of large numbers of desert woodrats. No San Diego desert woodrat individual or nests were observed during the biological surveys. Thus, impacts to this species are unlikely for this project and additional mitigation is not warranted. SDG&E is proposing revisions to the measure to eliminate the requirement for a 24 hour buffer if young are found present.</p>	<p>A CPUC-approved qualified biologist shall conduct a preconstruction survey to identify potential San Diego desert woodrat houses within the proposed project work areas and within 5 feet of the edge of the work areas to avoid direct take of woodrats. All woodrat houses shall be documented and reported through the MMCRP. Woodrat houses found within the work site or within 5 feet from a work site shall be flagged or fenced for avoidance. If impacts to a woodrat house located within a work site are unavoidable, a CPUC-approved qualified biologist, prior to construction and</p>	<p>A CPUC-approved qualified biologist shall conduct a preconstruction survey to identify potential San Diego desert woodrat houses within the proposed project work areas and within 5 feet of the edge of the work areas to avoid direct take of woodrats. All woodrat houses shall be documented and reported through the MMCRP. Woodrat houses found within the work site or within 5 feet from a work site shall be flagged or fenced for avoidance. If impacts to a woodrat house located within a work site are unavoidable, a CPUC-approved qualified biologist, prior to construction and</p>

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B1-88 (cont.)					outside of breeding season (April through June), shall dismantle the house by hand, removing the materials layer by layer to allow for adult woodrats to escape. If young are present and found during the disassembling process, a CPUC-approved qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and moved to another suitable nearby location to allow for nest reconstruction. Piles of cut vegetation/slash shall be retained near the work site prior to nest dismantling to provide refuge for woodrats that may become displaced.	outside of breeding season (April through June), shall dismantle the house by hand, removing the materials layer by layer to allow for adult woodrats to escape. All woodrat houses that require dismantling shall be documented and reported through the MCCR. If young are present and found during the disassembling process, a CPUC-approved qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and moved to another suitable nearby location to allow for nest reconstruction. of cut vegetation/slash shall be retained near the work site prior to nest dismantling to provide refuge for woodrats that may become displaced.
B1-89	4.4 BIO	4.4-66	MM BIO 9	As stated in Section 3.8 of the PEA, SDG&E's standard procedures and protocols related to the use of herbicide include the requirement to apply herbicide in accordance with applicable laws and regulations. A mitigation measure should not be required for herbicide application, as the items noted by the CPUC are consistent with SDG&E standard protocols. SDG&E also requests that language in this measure regarding the 100-foot buffer for special-status plants be modified to remain consistent with the language in the NCCP.	Only a State of California certified contractor (i.e., Qualified Applicator), will be permitted to perform herbicide applications. Herbicides will be applied in accordance with applicable laws, regulations, and permit stipulations. All herbicide applications must follow EPA label instructions. SDG&E shall only apply herbicides when wind speeds are between 3 and 10 mph. No herbicides shall be applied when rainfall is predicted within 48 hours or during periods of temperature inversions (i.e., when the air temperature at ground level is cooler than the air above it). Herbicides shall not be applied within 100 feet of a special-status plant.	Only a State of California certified contractor (i.e., Qualified Applicator), will be permitted to perform herbicide applications. Herbicides will be applied in accordance with applicable laws, regulations, and permit stipulations. All herbicide applications must follow EPA label instructions. SDG&E shall only apply herbicides when wind speeds are between 3 and 10 mph. No herbicides shall be applied when rainfall is predicted within 48 hours or during periods of temperature inversions (i.e., when the air temperature at ground level is cooler than the air above it). Herbicides shall not be applied within 100 feet of a special-status plant.
B1-90	4.4 BIO Mitigation	4.4-69	MM BIO 11	Mitigation Measure Biology-11 requires revegetation of temporary impacts, and eliminates SDG&E's ability to draw down mitigation credit in-lieu of restoration. SDG&E's NCCP Section 7.2 addresses the habitat enhancement measures for temporarily disturbed sites. As described in the response to Data Request AD.57 (November 2013), SDG&E may choose to conduct habitat enhancement in-lieu of credit withdraw for the temporarily disturbed areas along TL6965. Sites not meeting the success criteria described in Section 7.2 of the NCCP will be mitigated by credit withdraw through SDG&E's mitigation bank. For those temporarily disturbed areas at the substation site that will not be part of the landscaping	The Applicant shall prepare and implement a Restoration and Revegetation Plan for restoration and revegetation of temporarily disturbed areas. The Restoration and Revegetation Plan shall be prepared by a biologist with expertise in southern California ecosystems and native plant revegetation techniques. The Restoration and Revegetation Plan will include the following information: a. The location(s) of the area(s) of restoration and revegetation b. The plant species to be used (natives only), container sizes, and seeding rates in each area	<u>If SDG&E does not utilize the NCCP, then SDG&E shall implement the following:</u> The Applicant shall prepare and implement a Restoration and Revegetation Plan for restoration and revegetation of temporarily disturbed areas <u>within SDG&E's ROW along TL6965 in areas not subject to ongoing disturbance by other SDG&E maintenance activities or by other entities out of SDG&E's control.</u> The Restoration and Revegetation Plan shall be prepared by a biologist with expertise in southern California ecosystems and native plant revegetation techniques. The Restoration and Revegetation Plan will

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B1-90 (cont.)				<p>plan, no further monitoring or enhancement is required as the substation site was mitigated through the purchase of the 11.0959 acres of land purchase/conveyance in the Otay Ranch Preserve, as required per the Otay Ranch Resource Management Plan.</p> <p>In the event that SDG&E does not use the NCCP as a mitigation vehicle for the Salt Creek Project, SDG&E will prepare and implement a Revegetation and Restoration Plan for temporarily disturbed areas within SDG&E's ROW that are not subject to ongoing disturbance by other SDG&E maintenance activities or by other entities out of SDG&E's control.</p>	<p>c. The planting schedule for each restoration area d. A description of the irrigation method(s) e. Measures to control exotic vegetation in the restoration and revegetation area f. Specific success criteria including at a minimum: i. 70 percent cover of the restoration area ii. Less than 5 percent invasive weeds g. Detailed monitoring program that includes monitoring for a minimum of three years and until success criteria are met h. Contingency measures should the success criteria not be met</p> <p>The Applicant shall submit the Restoration and Revegetation Plan to the CPUC for review and approval at least 60 days prior to construction.</p>	<p>include the following information:</p> <p>a. The location(s) of the area(s) of restoration and revegetation b. The plant species to be used (natives only), container sizes, and seeding rates in each area c. The planting schedule for each restoration area d. A description of the irrigation method(s) e. Measures to control exotic vegetation in the restoration and revegetation area f. Specific success criteria including at a minimum: i. 70 percent cover of the restoration area ii. Less than 5 percent invasive weeds g. Detailed monitoring program that includes monitoring for a minimum of three years and until success criteria are met h. Contingency measures should the success criteria not be met</p> <p>The Applicant shall submit the Restoration and Revegetation Plan to the CPUC for review and approval at least 60 days prior to construction.</p>
B1-91	Biology	4.4-29	Table 4.4-8	<p>Impacts to sensitive habitat communities shown in Table 4.4-8 on page 4.4-29 are greater than those identified in our latest Pre-activity Survey Report (PSR). SDG&E is making a concerted effort to avoid and minimize impacts wherever possible. Impacts and mitigation ultimately required under the NCCP would be based on anticipated and actual impacts, as identified in the PSR and Post-Construction Report (PCR).</p> <p>The Hunte Parkway Staging Yard was previously impacted and will be developed by the Sweetwater School District. Impacts and mitigation for non-native grassland associated with the Hunte Parkway Staging Yard are the responsibility of the school district and should not be included in the calculations in this Draft EIR.</p>		
B1-92	4.4 BIO	4.4-20	3	<p>The third sentence incorrectly states that SDGE's QCB HCP relies on SDGE's 1995 Subregional Plan (NCCP). Although the QCB HCP does reference the Subregional Plan's protocols and was designed to work in concert with the Subregional Plan, it does not rely on the Subregional Plan. For example, the QCB HCP does adopt some of the</p>	<p>The SDG&E's HCP for QCB, which authorizes incidental take of federally endangered QCB, was approved in May 2007. The HCP authorizes loss of 33 acres of QCB habitat and requires SDG&E to implement general and QCB-specific operational protocols to avoid or minimize take of QCB. SDG&E's</p>	<p>The SDG&E's <u>Low-Effect QCB</u> HCP for QCB, which authorizes incidental take of federally endangered QCB, was approved in May 2007. The HCP authorizes loss of 33 acres of QCB habitat and requires SDG&E to implement general and QCB-specific operational protocols to avoid or minimize take of QCB. SDG&E's</p>

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B1-92 (cont.)				operational protocols from the NCCP (provided in Appendix A of the QCB HCP) to further minimize impacts to the QCB. The QCB HCP is a stand-alone document and functions independently of the Subregional Plan. Mitigation credits associated with the QCB HCP are separate from the Subregional Plan and the existence of the Subregional Plan in no way impacts the function of this QCB HCP.	HCP for QCB relies on the 1995 Subregional NCCP and states that should the 1995 Subregional NCCP become ineffective (i.e., is no longer being implemented), the protocols therein will still be implemented whenever a covered activity takes place in QCB habitat.	HCP for QCB relies on the 1995 Subregional NCCP is a stand-alone document that functions independently of the Subregional NCCP. The SDG&E QCB HCP has both a stand-alone Implementing Agreement and QCB Mitigation Fund that are completely independent of the NCCP. SDG&E will implement the protocols listed in Appendix A of QCB. and states that should the 1995 Subregional NCCP become ineffective (i.e., is no longer being implemented), the protocols therein will still be implemented whenever a covered activity takes place in QCB habitat.
B1-93	4.4 BIO	4.4-27	4.4-7	Hermes Copper butterfly status shown as CA Species of Concern. This is inaccurate. Hermes is not a state-listed species of concern.	Table 4.4-7.....Hermes Copper Butterfly CSC	Hermes Copper Butterfly CSC
B1-94	Construction/ Direct Impacts/ TL6965	4.4-70	3	The proposed project will have no new access roads that would cross drainages. Please see revised MM Hydro-1 for avoidance measures.	Temporary access roads cross drainages, and driving through drainages during or following a rain even when soils are moist could result in impacts to federally protected wetlands/waters. Such activities would result in hydrologic modification and cause a substantial adverse effect on federally jurisdictional waters; this impact would be a significant. Implementation of Mitigation Measure Hydro-1 (see Section 4.9: Hydrology and Water Quality) would reduce direct impacts to federally protected wetlands/waters to a less than significant level through the inclusion of temporary bridge crossings and regulatory agency coordination when access in the rainy season is required. Direct impacts to federally jurisdictional wetlands would be less than significant with mitigation.	Temporary access roads cross drainages, and driving <u>When an existing access road crosses through a jurisdictional drainage feature, driving through the drainages is allowed and is not an activity requiring permits. However conducting work activities, parking of vehicles, staging equipment, or the placement of fill of any sort, is not allowed within drainage features without acquiring appropriate State and Federal aquatic resource permits.</u> <u>Driving</u> through drainages during or following a rain even event when soils are moist saturated could result in impacts to <u>state and</u> federally protected wetlands/waters. Such activities would could result in hydrologic modification and cause a substantial adverse effect on federally jurisdictional waters; this <u>type of</u> impact would be a could be significant. Implementation of Mitigation Measure Hydro-1 (see Section 4.9: Hydrology and Water Quality) would reduce avoid direct impacts to federally protected wetlands/waters to a less than significant level through the inclusion of temporary bridge crossings and regulatory agency coordination when access in the rainy season is required. Direct impacts to federally jurisdictional wetlands would be less than significant with mitigation.

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4.5 – Cultural and Paleontological Resources						
B1-95	36. Cultural and Paleontological Resources	4.5-1	1	Three groups of cultural resources are mentioned, but only archaeological and historical resources are addressed in subsequent paragraphs. SDG&E believes that Contemporary Native American Resources should instead refer to Traditional (or Tribal) Cultural Resources, referring to traditional use areas that are still in use today, TCP, and landscapes. SDG&E recommends either: 1) adding a discussion of Traditional (or Tribal) Cultural Resources, or 2) adding a definition and brief discussion for “Contemporary Native American resources, or 3) changing “Three groups” to “Two groups” in the EIR discussion.		
B1-96	37. Survey and Archaeological Monitoring Results	4.5-8	3	Site CA-SDI-4897 was not discussed. The text was revised to include a discussion of CA-SDI-4897. The last sentence was revised to clarify that no cultural material was observed during the current survey efforts.	Three staging yards and five potential alternative staging yards are proposed for the project. One isolate, P-37-015138, was previously recorded in one of the staging yards and was previously collected (SDG&E 2013). Site CA-SDI-8666 was previously recorded in a staging yard as a lithic scatter (SDG&E 2013) and has been reclassified as an isolated find (SDG&E 2013). Two isolated finds, P-37-015375 and P-37-015377, were previously recorded just outside of the boundaries of one of the staging yards (SDG&E 2013). All visible ground surfaces were inspected, and no cultural material was observed within the proposed staging yards.	Three staging yards and five potential alternative staging yards are proposed for the project. CA-SDI-4897 is located within the existing substation staging yard (SDG&E 2013). It is not feasible to avoid this site. However, the existing station yard is a previously constructed area and no ground-disturbance is proposed for this staging yard. One isolate, P-37-015138, was previously recorded in one of the staging yards and was previously collected (SDG&E 2013). Site CA-SDI-8666 CA-SDI-8666 was previously recorded in a staging yard as a lithic scatter (SDG&E SDG&E 2013) and has been reclassified as an isolated find (SDG&E 2013). Two isolated finds, P37-015375 and P-37-015377, were previously recorded just outside of the boundaries of one of the staging yards (SDG&E 2013). All During the survey efforts for the project, all visible ground surfaces were inspected, and no cultural material was observed within the proposed staging yards (SDG&E 2013).
B1-97	38. Native American Coordination Results	4.5-9	3	A Native American monitor was present during testing efforts and a sentence was added to note this. See AECOM’s 2014 letter report (below) and add discussion to paragraph. <i>Cultural Resources Testing and Evaluation at Sites CA-SDI-7197 and CA-SDI-12909 in Support of the Salt Creek Substation and Transmission Line Improvement Project Proponents Environmental Assessment (PEA), Otay Mesa Area, Southwestern San Diego County, California.</i>	Based on the information presented by Dr. Hector regarding past surveys conducted in the area and on the brief site visit, it was determined that no Native American monitor was required during the pedestrian survey effort.	Based on the information presented by Dr. Hector regarding past surveys conducted in the area and on the brief site visit, it was determined that no Native American monitor was required during the pedestrian survey effort. However, a Native American monitor was present for the 2104 testing efforts of sites CA-SDI-7191 and CA-SDI-12909.

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B1-98	APM CUL-7	4.5-18	Table 4.5-2	Delete Sentence in APM CUL-7: Discovery of Human Remains. If there is a potential of human remains, it must be determined by the coroner per Health and Safety Code Section 7050.5.	Under some circumstances, a determination may be made without direct input from the Medical Examiner.	Under some circumstances, a determination may be made without direct input from the Medical Examiner.
B1-99	Staging Yards	4.5-21	3	Add information regarding CA-SDI-4897		<u>CA-SDI-4897 is located within the existing substation staging yard (SDG&E 2013). It is not feasible to avoid this site. However, the existing station yard is a previously constructed area and no ground-disturbance is proposed for this staging yard.</u>
B1-100	Mitigation Measure Cultural Resources-1	4.5-22	2	Please change the halt work distance from 165 feet to 50 feet (15 meters) since 50 feet is generally accepted for this circumstance.	If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 165 feet (50 meters) of the area of the find, and the cultural resources specialist/archaeologist shall consult with CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).	If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 165-50 feet (50-15 meters) of the area of the find, and the cultural resources specialist/archaeologist shall consult with CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).
B1-101	Mitigation Measure Cultural Resources-2	4.5-23	2	Cultural reports are confidential and kept on-file at information centers/agencies where access to the sensitive data can be monitored. Existing language implies that the general public has access. The text has been revised to clarify that cultural reports will be sent to appropriate locations.	The HPTP shall include provisions for analysis of data in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by CPUC, and dissemination of reports to local and state repositories, libraries, and interested professionals.	The HPTP shall include provisions for analysis of data in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by CPUC, and dissemination of reports to <u>appropriate</u> local and state repositories; libraries, interested professionals.
B1-102	Mitigation Measure Paleontology-1	4.5-27	5	See comment 41 above for page 4.5-22 regarding buffer width and revise.	In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required.	In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within 165-50 feet (50-meters <u>15 meters</u>) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required.
B1-103	MM Cul-1	9-31	Table 9.1-1	See the comment 41 above for page 4.5-22 regarding buffer width and revise.	If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 165 feet (50 meters) of the area of the find, and the cultural resources specialist/archaeologist shall consult with CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).	If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 165-50 feet (50-15 meters) of the area of the find, and the cultural resources specialist/archaeologist shall consult with CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b).

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B1-104	MM Pal-1	9-33	Table 9.1-1	See the comment 41 above for page 4.5-22 regarding buffer width and revise	In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required.	In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within 165-50 feet (50-15 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required.
4.6 – Geology and Soils						
B1-105	4.6.4	4.6-25	Paragraph -5	Mitigation Measure Geology-1 states that following temporary surface disturbances, final stabilization will occur within 7 days. However, the California State Water Resources Control Board Order No. 2009-0009-DWQ (referred to as the California Construction General Permit [CGP]) and the SDG&E Best Management Practices (BMP) Manual for Water Quality Construction reference a different definition of inactive area requiring stabilization. CGP Attachment A – Section I.4b “Erosion Control” specifies that effective soil cover shall be provided for inactive areas for finished slopes and utility backfill. In this reference, inactive areas are defined as areas of construction activity that have been disturbed and are not scheduled to be re-disturbed for at least 14 days. Additionally, the SDG&E Water Quality Construction BMP Manual (included in DEIR Appendix H – “Geologic Resources Supplement”) in BMP 4-02, defines erosion control and soil stabilization measures for inactive soil disturbance areas that will not be worked for 14 days or more. Pursuant to the SWPPP for the proposed project, BMPs will be implemented and maintained throughout construction of the project until final stabilization measures are implemented at the end of construction.	Mitigation Measure Geology-1: Once temporary surface disturbances are complete, areas that will not be subject to additional disturbance shall be stabilized within 7 days using permanent stabilization BMPs to control soil erosion. BMPs may include hydroseeding, planting, and minor regrading. An SDG&E Reclamation Specialist shall inspect and monitor BMPs following installation in areas where revegetation has been performed until the minimum vegetative cover specified in the Revegetation Plan (see Mitigation Measure Biology-11) is established.	Mitigation Measure Geology-1: Once temporary surface disturbances are complete, areas that will not be subject to additional disturbance <u>will begin permanent stabilization efforts using permanent stabilization BMPs to control soil erosion immediately after temporary BMPs have been removed.</u> Permanent stabilization BMPs may include hydroseeding, planting, and minor regrading. An SDG&E Reclamation Specialist shall inspect and monitor BMPs following installation in areas where revegetation has been performed until the minimum vegetative cover specified in the Revegetation Plan (see Mitigation Measure Biology-11) is established.
4.7 - Greenhouse Gas Emissions						
B1-106	4.7.5	4.7-10	Paragraph 3	The Mitigation Measure GHG-1 needs to reference AB1826 and define what constitutes “organic waste” under the Bill.	Mitigation Measure GHG-1: SDG&E shall dispose of organic matter removed after 2016 by means other than transporting to a landfill. Options for non-landfill disposal may include composting on previously disturbed SDG&E land or participating in a greenwaste recycling program. SDG&E shall notify the CPUC of the disposal method at least 30 days prior to construction.	Mitigation Measure GHG-1: SDG&E shall dispose of organic matter removed after 2016 by means other than transporting to a landfill. Options for non-landfill disposal may include composting on previously disturbed SDG&E land or participating in a greenwaste recycling program. Pursuant to AB1816, starting April 2016, SDG&E shall arrange for recycling of green waste, landscaping/pruning waste, and other organic matter (as defined in the Bill) generated during construction and operation activities (instead of diversion to municipal landfill). SDG&E shall notify

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B1-106 (cont.)						the CPUC of the disposal method at least 30 days prior to construction.
B1-107	4.7.5	4.7-8	Last Paragraph	<p>The document states that the County’s Climate Action Plan and City of Chula Vista’s Plan include provisions to designate bikeways and bike lanes and improve pedestrian safety. The DEIR concludes that the Project will temporarily block bike and pedestrian paths on Hunte Parkway it would constitute a significant impact.</p> <p>The hindrance to bike and pedestrian access due to the Project is temporary and confined to a very small portion of the overall network of bike lanes and sidewalks in the County. It does not conflict with either plan. The impact on overall GHG reductions goals of the County or the City should be minimal. It is hard to justify that this constitutes a conflict with the County and City’s GHG reduction Plans.</p> <p>SDG&E would prepare a traffic control plan to detour all modes of traffic, including bicyclists and pedestrians. Temporary traffic detours should not be considered to be a conflict with County and City GHG reduction plans.</p> <p>The Traffic Section of the document already requires detour for bicyclists and pedestrians to reduce impacts to bike lanes and safe pedestrian access (under Measure Traffic-3). No Mitigation under the GHG Section is necessary.</p>	<p>The San Diego County Climate Action Plan and the Chula Vista CO2 Reduction Plans include designating bikeways and bike lanes, improving safety of pedestrian travel, and facilitating direct pedestrian connection with transit (City of Chula Vista 2000). The project would temporarily block bike and pedestrian paths on Hunte Parkway during installation of the distribution circuits and potentially during delivery of materials to the substation site. The impact to bicycle and pedestrian facilities would be a significant impact. Mitigation Measure Traffic-3 requires detours for bicyclists and pedestrians to reduce impacts to bike lanes and safe pedestrian travel. Impacts would be less than significant with mitigation.</p>	<p>The San Diego County Climate Action Plan and the Chula Vista CO2 Reduction Plans include designating bikeways and bike lanes, improving safety of pedestrian travel, and facilitating direct pedestrian connection with transit (City of Chula Vista 2000). The project would temporarily block bike and pedestrian paths on Hunte Parkway during installation of the distribution circuits and potentially during delivery of materials to the substation site. <u>Short-term temporary closures would have no impact on the County and City climate action plans and impacts would be less than significant.</u> The impact to bicycle and pedestrian facilities would be a significant impact. Mitigation Measure Traffic-3 requires detours for bicyclists and pedestrians to reduce impacts to bike lanes and safe pedestrian travel. Impacts would be less than significant with mitigation.</p>
4.8 – Hazards and Hazardous Materials						
B1-108	Hazards & Haz Mat’s	4.8-7	Conductive Interference	Incorporate clarifications to the discussion of Conductive Interference, as shown.	<p>Conductive Interference. Conductive interference occurs when electric currents are discharged into the ground through the power line structure during fault conditions on a nearby pipeline. Unlike inductive interference, conductive interference only acts on the portion of the pipeline near where the current is being discharged into the ground. Conductive interference only affects pipelines that are parallel to the power line. Conductive interference can result in similar hazardous effects to those resulting from inductive interference.</p>	<p>Conductive Interference. Conductive interference occurs when electric currents are discharged into the ground through the power line structure during fault conditions on, <u>and can affect</u> a nearby pipeline. Unlike inductive interference, conductive interference only acts on the portion of the pipeline near where the current is being discharged into the ground. Conductive interference <u>not</u> only affects pipelines that are parallel to the power line <u>but also can affect pipelines at crossings</u>. Conductive interference can result in similar hazardous effects to those resulting from inductive interference.</p>

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B1-109 50.	Hazards & Haz Mat'ls	4.8-22	Last paragraph	Corrections as shown.	AC interference effects, as discussed under Impact Hazards-2, can include accelerated pipeline corrosion, which in turn could result in loss of pipeline integrity and release of hazardous materials (i.e., natural gas) from adjacent buried gas pipelines. The AC design features proposed by SDG&E for the 4-inch and 36-inch gas pipelines would reduce the voltage densities on these pipelines. Voltage densities would be less than the design criteria for all pipelines in the corridor with use of the proposed AC design features. The power line would not cause corrosion of the adjacent buried gas pipelines with SDG&E's proposed design features. Impacts would be less than significant, and no mitigation is required.	AC interference effects, as discussed under Impact Hazards-2, can include accelerated pipeline corrosion, which in turn could result in loss of pipeline integrity and release of hazardous materials (i.e., natural gas) from adjacent buried gas pipelines. The AC design features proposed by SDG&E for the 4-inch and 36-inch gas pipelines would reduce the voltage <u>current</u> densities on these pipelines. Voltage <u>Current</u> densities would be less than the design criteria for all pipelines in the corridor with use of the proposed AC design features. The power line would not cause corrosion of the adjacent buried gas pipelines with SDG&E's proposed design features. Impacts would be less than significant, and no mitigation is required.
B1-110 51.	APM Haz-1	4.8-15	Table 4.8-4	The SPCC rule provides requirements specific to oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines and only applies to the oil storage at the Salt Creek Substation (see page 3-6 of PEA).	Spill Prevention, Control, and Countermeasure Plan: A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared prior to project construction and that addresses response procedures in the event of any release or spill of hazardous materials during construction. The SPCC plan will establish procedures, methods, equipment requirements, and worker training to prevent spills or leaks from reaching waterways and leaving the site.	Spill Prevention, Control, and Countermeasure Plan: A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared prior to project construction and that addresses response procedures in the event of any release or spill of hazardous materials during construction <u>The When the transformers at the proposed Salt Creek Substation site contain more than 1,320 gallons of mineral oil, an SPCC Plan for the facility is required.</u> The SPCC plan will establish procedures, methods, equipment requirements, and worker training to prevent <u>oil</u> spills or leaks from reaching <u>navigable waterways</u> .
B1-111 52.	9. MMRP	9-37	9.1-1	Water trucks/tanks will be available for the project, but are able to move around from area to area, and are not stationed at every work area, at all times. SDG&E is proposing modifications to the text to reflect this intent. SDG&E's designated Fire Marshal/Coordinator shall manage fire protection consultation.	Mitigation Measure Hazards-2: SDG&E and/or its contractors shall have water tanks and/or water trucks sited/available at active project sites for fire protection during project construction. All construction vehicles shall have fire suppression equipment. Construction personnel shall be required to park vehicles away from dry vegetation. Prior to construction, SDG&E and its contractors shall contact and coordinate with CalFire and applicable local fire departments (i.e., City of Chula Vista and San Diego County) to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks if water trucks are not used. SDG&E shall submit verification of its consultation with CalFire and the local fire departments to CPUC.	Mitigation Measure Hazards-2: SDG&E and/or its contractors shall have water tanks and/or water trucks sited/available <u>available</u> at active project sites for fire protection during project construction. All construction vehicles shall have fire suppression equipment. Construction personnel shall be required to park vehicles away from dry vegetation <u>vegetation</u> . Prior to construction, SDG&E and its contractors' <u>s Fire Marshal/Coordinator</u> shall contact and coordinate with CalFire and applicable local fire departments (i.e., City of Chula Vista and San Diego County) to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks if water trucks are not used. SDG&E shall submit verification of its consultation with CalFire and the local fire departments to CPUC.

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B1-112 53.	9. MMRP	9-37	9.1-1	See comment 52 above.	<p>Monitoring/Reporting Requirement</p> <p>SDG&E:</p> <p>Have water tanks and/or water trucks on site and require construction vehicles to have fire suppression equipment.</p> <p>Park vehicles away from dry vegetation.</p> <p>Consult with CalFire and local fire departments to determine appropriate amount of fire equipment to carry and locations for water tanks, if necessary.</p> <p>CPUC:</p> <p>Verify water tanks and/or water trucks are present on site.</p> <p>Verify vehicles are parked away from dry vegetation.</p> <p>Review consultation with CalFire and local fire departments.</p>	<p>Monitoring/Reporting Requirement</p> <p>SDG&E:</p> <p>Have water tanks and/or water trucks on-site available and require construction vehicles to have fire suppression equipment.</p> <p>Park vehicles away from dry vegetation.</p> <p>Consult with CalFire and local fire departments to determine appropriate amount of fire equipment to carry and locations for water tanks, if necessary.</p> <p>CPUC:</p> <p>Verify water tanks and/or water trucks are present on site available.</p> <p>Verify vehicles are parked away from dry vegetation.</p> <p>Review consultation with CalFire and local fire departments.</p>
B1-113 54.	9. MMRP	9-37	9.1-1	See comment 52 above.	<p>Effectiveness Criteria</p> <p>Water trucks are on site.</p> <p>Vehicles are parked away from dry vegetation.</p> <p>Consultation with CalFire and local fire departments occurs.</p>	<p>Effectiveness Criteria</p> <p>Water trucks are on-site available.</p> <p>Vehicles are parked away from dry vegetation.</p> <p>Consultation with CalFire and local fire departments occurs.</p>
B1-114 55.	9. MMRP	9-36, 9-37	9.1-1	SDG&E would like to clarify that APM Hazards-3 should not limit certain work during times of high fire threat. SDG&E has added language to the measure to reflect that no “at risk” activities will be conducted except for those activities which if, left undone present a greater risk than that involved with their accomplishment when the Fire Potential Index is Extreme (includes Red Flag Warnings). Some activities may be allowed inside substation fences and inside staging yards after consultation with the SDG&E On-duty Fire Coordinator/Fire specialist to make determination and identify additional mitigation requirements to reduce risk.	<p>APM HAZ-3: Wildland Fire Prevention and Fire Safety Practices:</p> <p>Construction within “High” and “Very High” Fire Threat Zones (identified by the Fire and Resource Assessment Program (FRAP) maintained by CalFire) will be consistent with SDG&E’s current design standards to improve service reliability in fire-prone areas during extreme weather conditions. SDG&E’s current design standards include increasing conductor spacing to improve line clearances; installing steel poles to withstand extreme winds; installing self-supporting angle structures, which eliminate guying; and installing longer polymer insulators to minimize the potential of electrical faults caused by contamination, which will improve system reliability.</p>	<p>APM HAZ-3: Wildland Fire Prevention and Fire Safety Practices:</p> <p>Construction within “High” and “Very High” Fire Threat Zones (identified by the Fire and Resource Assessment Program (FRAP) maintained by CalFire) will be consistent with SDG&E’s current design standards to improve service reliability in fire-prone areas during extreme weather conditions. SDG&E’s current design standards include increasing conductor spacing to improve line clearances; installing steel poles to withstand extreme winds; installing self-supporting angle structures, which eliminate guying; and installing longer polymer insulators to minimize the potential of electrical faults caused by contamination, which will improve system reliability.</p>

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B1-114 (cont.)				<p>SDG&E will adhere to its current operating protocol, Electric Standard Practice (ESP) 113.1, Wildland Fire Prevention and Fire Safety Standard Practice, which includes requirements for carrying emergency fire suppression equipment; conducting “tailgate meetings” that cover fire safety discussions, restricting smoking, and idling vehicles; and restricting construction during red flag warnings. The project will also comply with SDG&E’s project-specific Construction Fire Plan. The Construction Fire Plan addresses the following fire risk reduction measures:</p> <ul style="list-style-type: none"> • Training and briefing all personnel working on the project in fire prevention and suppression methods; • Conducting a fire prevention discussion at each morning’s safety meeting; • Storage of prescribed fire tools and backpack pumps with water within 50 feet of work activities; and • Assigning personnel to conduct a “fire watch” or “fire patrol” to ensure that risk mitigation and fire preparedness measures are implemented, immediate detection of a fire, and to coordinate with emergency response personnel in the event of a fire. <p>Weather and fire danger will be monitored daily by company meteorologists and wildland fire specialists to provide timely and immediate communication of significant changes that could impact the project. No work will occur during times of high fire threat, and if conditions change after commencing construction, work will cease in periods of extreme fire danger, such as red flag warnings issued by the National Weather Service or other severe fire weather conditions as identified by SDG&E.</p>	<p>SDG&E will adhere to its current operating protocol, Electric Standard Practice (ESP) 113.1, Wildland Fire Prevention and Fire Safety Standard Practice, which includes requirements for carrying emergency fire suppression equipment; conducting “tailgate meetings” that cover fire safety discussions, restricting smoking, and idling vehicles; and restricting construction during red flag warnings. The project will also comply with SDG&E’s project-specific Construction Fire Plan. The Construction Fire Plan addresses the following fire risk reduction measures:</p> <ul style="list-style-type: none"> • Training and briefing all personnel working on the project in fire prevention and suppression methods; • Conducting a fire prevention discussion at each morning’s safety meeting; • Storage of prescribed fire tools and backpack pumps with water within 50 feet of work activities; and • Assigning personnel to conduct a “fire watch” or “fire patrol” to ensure that risk mitigation and fire preparedness measures are implemented, immediate detection of a fire, and to coordinate with emergency response personnel in the event of a fire. <p>Weather and fire danger will be monitored daily by company meteorologists and wildland fire specialists to provide timely and immediate communication of significant changes that could impact the project. No work will occur during times of high fire threat, and if conditions change after commencing construction, work will cease in periods of extreme fire danger, such as red flag warnings issued by the National Weather Service or other severe fire weather conditions as identified by SDG&E. <u>“at risk” activities will be conducted except for those activities which, if left undone, present a greater risk than that involved with their accomplishment when the Fire Potential Index is Extreme (includes Red Flag Warnings). Some activities may be allowed inside substation fences and inside staging yards after consultation with the On-duty Fire Coordinator/Fire specialist to make determination and identify additional mitigation requirements to reduce</u></p>	

B1-114
 (cont.)

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56.	9. MMRP	9-36	9.1-1	See comment 55 above. In addition, SDG&E wildland fire specialists may be onsite periodically, but would not remain onsite for the duration of construction. at risk refers to activities in wildland areas which present a potential of ignition, either directly or indirectly, which may cause a fire. The activities may occur pre, during, or post construction.	<p>Monitoring/Reporting Requirement SDG&E:</p> <p>SDG&E:</p> <p>Work will be consistent with SDG&E’s design standards for fire-prone areas.</p> <p>Adhere to applicable protocols and plans (current operating protocol, Electric Standard Practice (ESP) 113.1, Wildland Fire Prevention and Fire Safety Standard Practice, and SDG&E’s project-specific Construction Fire Plan).</p> <p>A meteorologist and wildland fire specialist monitor weather conditions daily.</p> <p>Work will not occur during times of high fire threat.</p> <p>CPUC:</p> <p>Verify that construction is consistent with SDG&E’s design standards for fire-prone areas and adheres to applicable protocols and plans.</p> <p>Verify meteorologists and wildland fire specialists are present during construction.</p> <p>Verify that no work occurs during times of high fire threat.</p>	<p><u>risk.</u></p> <p>Monitoring/Reporting Requirement SDG&E:</p> <p>SDG&E:</p> <p>Work will be consistent with SDG&E’s design standards for fire-prone areas.</p> <p>Adhere to applicable protocols and plans (current operating protocol, Electric Standard Practice (ESP) 113.1, Wildland Fire Prevention and Fire Safety Standard Practice, and SDG&E’s project-specific Construction Fire Plan).</p> <p>A meteorologist and wildland fire specialist monitor weather conditions daily.</p> <p>Work will not occur during times of high fire threat <u>No “at risk” activities (“at risk” refers to activities in wildland areas which present a potential of ignition, either directly or indirectly, which may cause a fire; he activities may occur pre, during, or post construction) will be conducted except for those activities which if, left undone present a greater risk than that involved with their accomplishment when the Fire Potential Index is Extreme (includes Red Flag Warnings). Some activities may be allowed inside substation fences and inside staging yards after consultation with the On-duty Fire Coordinator/Fire Specialist to make determination and identify additional mitigation requirements to reduce risk.</u></p> <p>CPUC:</p> <p>Verify that construction is consistent with SDG&E’s design standards for fire-prone areas and adheres to applicable protocols and plans.</p> <p>Verify meteorologist and/or wildland fire specialists are present <u>periodically</u> during construction.</p> <p>Verify that no work occurs during times of high fire threat.</p>

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B1-115 (cont.)						No “at risk” activities will be conducted except for those activities which, if left undone, present a greater risk than that involved with their accomplishment when the Fire Potential Index is Extreme (includes Red Flag Warnings). Some activities may be allowed inside substation fences and inside staging yards after consultation with the On-duty Fire Coordinator/Fire specialist to make determination and identify additional mitigation requirements to reduce risk.
B1-116	9. MMRP	9-36	9.1-1	See Comments 55 and 56 above.	<p>Effectiveness Criteria</p> <p>Construction is consistent with SDG&E’s design standards for fire-prone areas as well as applicable protocols and plans.</p> <p>Meteorologists and wildland fire specialists are present during construction.</p> <p>Work does not occur during times of high fire threat.</p>	<p>Effectiveness Criteria</p> <p>Construction is consistent with SDG&E’s design standards for fire-prone areas as well as applicable protocols and plans.</p> <p>Meteorologists A SDG&E wildland fire specialists are present specialist will be available for consultation (off site) during construction.</p> <p>No “at risk” activities will be conducted except for those activities which, if left undone, present a greater risk than that involved with their accomplishment when the Fire Potential Index is Extreme (includes Red Flag Warnings). Some activities may be allowed inside substation fences and inside staging yards after consultation with the On-duty Fire Coordinator/Fire specialist to make determination and identify additional mitigation requirements to reduce risk.</p> <p>Work does not occur during times of high fire threat.</p>
4.9 - Hydrology and Water Quality						
B1-117	Analysis	4.9-15	last	The SPCC will not apply to the TL 6965 construction. Reliance on the SWPPP and Hazardous Substance Management and Emergency Response Plan for proper housekeeping and secondary containment would reduce potential impacts to less than significant. Please revise paragraph on page 4.9-15.	Portions of the proposed power line cross over Telegraph Canyon Creek, Poggi Canyon Creek, and a named tributary of Sweetwater River. Telegraph Canyon Creek has elevated levels of and is impaired for selenium, and Poggi Canyon Creek is impaired for toxicity. Ground-disturbing activities would not occur within or near these waters. APM HAZ-1 requires SDG&E to implement a SPCC Plan including containment and clean-up of hazardous material spills. The project would not contribute to downstream toxicity due to the proposed containment and clean-up	Portions of the proposed power line cross over Telegraph Canyon Creek, Poggi Canyon Creek, and a named tributary of Sweetwater River. Telegraph Canyon Creek has elevated levels of and is impaired for selenium, and Poggi Canyon Creek is impaired for toxicity. Ground-disturbing activities would not occur within or near these waters. APM HAZ-1 requires SDG&E to implement a Hazardous Substance Management and Emergency Response Plan Plan SPCC including containment and clean-up of hazardous material spills. The project would not contribute to

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B1-117 (cont.)					of any hazardous materials. Construction of the proposed project would not contribute to selenium or toxicity levels in Telegraph Canyon Creek or Poggi Canyon Creek, respectively, nor would it affect water quality in the named tributary of Sweetwater River. The power line construction would not cause sediment release in excess of a water quality standard due to the limited amount of earth disturbance involved in the power line construction and the isolated nature of the work areas. The impact from sediment to water quality would be less than significant. While less than significant, APM HYDRO-1 would further reduce the impact through implementation of sediment control BMPs. Impacts from sedimentation or hazardous material discharges would be less than significant, and no mitigation is required.	downstream toxicity due to the proposed containment and clean-up of any hazardous materials. Construction of the proposed project would not contribute to selenium or toxicity levels in Telegraph Canyon Creek or Poggi Canyon Creek, respectively, nor would it affect water quality in the named tributary of Sweetwater River. The power line construction would not cause sediment release in excess of a water quality standard due to the limited amount of earth disturbance involved in the power line construction and the isolated nature of the work areas. The impact from sediment to water quality would be less than significant. While less than significant, APM HYDRO-1 would further reduce the impact through implementation of sediment control BMPs. Impacts from sedimentation or hazardous material discharges would be less than significant, and no mitigation is required.
B1-118	Impact Hydro-1	4.9-15		SDG&E respectfully requests that information regarding the use of recycled water for the Proposed Project be included in the Final EIR. The analysis in Impact Hydro-1 should include this discussion of the use of recycled water and how such use would comply with water quality standards or waste discharge requirements.		<p><i>Text to be Inserted:</i></p> <p><u>Recycled Water Source</u></p> <p><u>To utilize the San Diego Regional Water Quality Control Board (RWQCB) waiver number 2 for low-threat discharges to land of recycled water, recycled water for construction of all portions of the project within Chula Vista and the County of San Diego would be provided by OWD, if available during the construction period. Existing purple pipe is located in the vicinity of the planned Salt Creek substation on Hunte Parkway and SDG&E would work with OWD to establish a secure meter for recycled water supply during project construction. In addition, SDG&E will work with OWD to supply the substation with firefighting and landscape irrigation supply of recycled water long-term through purple pipe. The existing SDG&E Miguel Substation is currently supplied with recycled water from OWD for firefighting and landscape irrigation water and this source would be utilized for onsite construction as well. All project application areas are permitted under the Ralph W. Chapman Water Recycling Facility Waste Discharge Requirements (WDR's).</u></p> <p><u>Recycled Water Discharge to Land and Waste</u></p>

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B1-118 (cont.)						<p><u>Discharge Requirements (WDRs)</u></p> <p><u>Water used for construction of the project including potable and/or recycled water would be discharged to land in a manner consistent with all applicable Waste Discharge Requirements (WDRs) issued by the RWQCB. In addition, consistent with RWQCB Waiver Number 2 recycled water would not be discharged to Waters of the U.S., Waters of the State or any part of the Municipal Separate Storm Sewer System (MS4).</u></p>
B1-119	Mitigation Measure Hydro-2	4.9-17	2nd paragraph	Mitigation Measure Hydro-2 should be revised to address the disposal of groundwater that is found not to be clean, clear, and odor-free.	<p>Mitigation Measure Hydro-2: Groundwater extracted during construction dewatering shall not be discharged to surface waters or storm drains. If dewatering is necessary, the water would either be directed to relatively flat upland areas for evaporation and infiltration back to the water table, used for dust control, used to irrigate upland areas, or used as makeup for a construction process (e.g., concrete production).</p>	<p>Mitigation Measure Hydro-2: Groundwater extracted during construction dewatering shall not be discharged to surface waters or storm drains. If dewatering is necessary, the water would either be directed to relatively flat upland areas for evaporation and infiltration back to the water table, used for dust control, used to irrigate upland areas, or used as makeup for a construction process (e.g., concrete production). <u>If the ground water is found not to be clean, clear and odor-free, then it would be disposed of at an appropriate designated facility.</u></p>
B1-120	Substation Construction	4.9-19	End of 1st paragraph	The DEIR incorrectly states that substation construction would retain the existing brow ditches present on site.	Construction would retain the existing brow ditches present on site.	<p>Construction would retain the existing brow ditches present on site. <u>The proposed construction would remove and replace portions of the existing brow ditch along the sewer access road where the road is being widened for substation access. However, the resultant brow ditch system would function the same as the existing in both location and conveyance. The rebuilt portions of ditch northerly of the widened sewer access road would differ from existing only by slight elevation or horizontal variations.</u></p>
B1-121	Impact Hydro-3	4.9-18	Last paragraph that starts at the bottom of the page	Grading quantities have been corrected to accurately reflect the proposed project (see revisions made in the Project Description, page 2-29 and Table 2.7-1). It appears that the CPUC has calculated the impervious area at the substation site to be more than twice that of the actual design. SDG&E's design and implementation of the water quality detention basin will be in compliance with the City of Chula Vista's current storm water manual and drainage manual. The analysis of the current design indicates that it is slightly undersized for Hydromodification above-ground volume. SDG&E has modified the reported quantities accordingly. Revised design and/or calculation	<p>Construction of the proposed substation would require grading to construct a flat pad within a sloping parcel. The grading would involve approximately 61,600 cubic yards of cut material and approximately 83,100 cubic yards of fill. Grading of the substation site would result in steep slopes to the south and east of the substation pad and along the expanded substation access road.</p> <p>The drainage pattern at the substation site would be substantially altered during grading and site preparation activities, which would result in steeper slopes and redirected flows to the west and southeast of the</p>	<p>Construction of the proposed substation would require grading to construct a flat pad within a sloping parcel. The grading would involve approximately 61,600 <u>90,000</u> cubic yards of cut material and approximately 83,100 <u>138,000</u> cubic yards of fill <u>including required overexcavation and contingency</u>. Grading of the substation site would result in steep slopes to the south and east <u>southwesterly and southeasterly</u> of the substation pad and along the expanded substation access road.</p> <p>The drainage pattern at the substation site would be</p>

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B1-121 (cont.)				<p>methodology of the basin will not affect the general location or extent of the DEIR design. Additional information is provided below.</p> <p>The proposed bioretention basin will be designed to mitigate for (1) water quality impacts, (2) hydromodification impacts, and (3) flood control impacts. Water quality treatment and hydromodification were analyzed by using the County of San Diego’s Sizing Calculator and in accordance with the City of Chula Vista’s Development Stormwater Manual. The flood control analysis evaluated the 100-year, 6-hour storm event in accordance with the City’s requirements and shows that the post-development flows leaving the site will be less than the pre-development flows by implementing the on-site bioretention basin.</p> <p>The total tributary area to the bioretention basin is approximately 4.8 acres.</p> <p>Of the approximately 4.8 acres, about 1.6 acres is tributary to the NSBB water quality unit upstream of the water quality detention basin. Consequently, this area was removed from the water quality calculations which were performed using the County of San Diego’s BMP sizing calculator. As currently designed (Oct. 2014), the bioretention basin surface area meets the calculated water quality site requirements.</p> <p>In regards to hydromodification, the total impervious area tributary to the bioretention basin is approximately 85,000 square feet. The calculations from the County of San Diego’s BMP sizing calculator indicate that the current surface volume for the bioretention should be increased by approximately 25% to meet the site requirements for hydromodification. The total required volume of the basin is comprised of two different volumes that are calculated by the County’s sizing calculator: above-ground surface volume and sub-surface volume (storage in the rock reservoir underneath the basin). As the design stands now, the subsurface volume for the bioretention basin meets the hydromodification site requirements but the above-ground volume will still need to be increased (if using the County sizing calculator).</p>	<p>substation site. The substation construction would not substantially alter the course of a stream or a river because there are no streams or rivers on site. On the southwest side of the substation, the substation site drainage design would redirect the existing drainage around the fill slope to the west by approximately 100 feet. On the west side of the substation a storm drain pipe would be installed underground to direct water from the detention basin to the existing 96-inch-diameter reinforced concrete storm drain outfall. The drainage design includes storm drain outfalls, bench and terrace drains, and a water quality detention basin. Construction would retain the existing brow ditches present on site. (Note: omitted next paragraph with no changes.)</p> <p>The substation design includes the addition of approximately 172,500 square feet (3.96 acres) of impervious surface. The additional impervious surfaces have the potential to increase the rate of runoff from the site by approximately 3.7 cubic feet per second in a 2-year, 24-hour storm event¹ (i.e., an event lasting 24 hours that has a 50 percent chance of occurring in any given year). The addition of impervious surfaces would increase the rate of surface runoff causing downstream erosion due to increased flow volumes. Increase in offsite erosion would be a significant impact.</p> <p>The substation design includes a water quality detention basin to reduce the potential for erosion caused by additional impervious surfaces on site. The proposed detention basin is currently designed to contain runoff from 75,000 square feet of impervious surface (SDG&E 2013). The proposed project could result in approximately 172,500 square feet of impervious surface. The substation detention basin is inadequately sized for the amount of impervious surface that would be created by construction of the proposed substation. Stormwater runoff could bypass the basin in a storm and cause downstream erosion resulting in a significant impact. Mitigation Measure Hydro-3 would require SDG&E to construct the detention basin to a size that would comply with the City of Chula Vista Development Stormwater Manual.</p>	<p>substantially altered during grading and site preparation activities, which would result in steeper slopes and redirected flows to the west and southeast of the substation site. The substation construction would not substantially alter the course of a stream or a river because there are no streams or rivers on site. On the southwest side of the substation, the substation site drainage design would redirect the existing drainage around the fill slope to the west by approximately 100 feet. On the west side of the substation a storm drain pipe would be installed underground to direct water from the detention basin to the existing 96-inch-diameter reinforced concrete storm drain outfall. The drainage design includes storm drain outfalls, bench and terrace drains, and a water quality detention basin. Construction would retain the function and location of the existing brow ditches present on site. (Note: omitted next paragraph with no changes.)</p> <p>The substation design includes the addition of approximately 172,500 85,000 square feet (3.96 1.95 acres) of impervious surface. The additional impervious surfaces have the potential to increase the rate of runoff from the site by approximately 3.7 cubic feet per second in a 2-year, 24-hour storm event¹ (i.e., an event lasting 24 hours that has a 50 percent chance of occurring in any given year). The addition of impervious surfaces would increase the Increased rate of surface runoff potentially causing downstream erosion due to increased flow volumes. Increase in offsite erosion would be a significant impact.</p> <p>The substation design includes a water quality detention basin to reduce the potential for erosion caused by additional impervious surfaces on site. The proposed detention basin is currently designed to contain runoff from 75,000 square feet of impervious surface (SDG&E 2013). The proposed project could result in approximately 172,500 85,000 square feet of impervious surface. The current substation detention water quality basin design is inadequately sized for the amount of impervious surface that would be created by construction of the proposed substation. Stormwater runoff could bypass the basin in a storm and cause</p>

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B1-121 (cont.)				<p>Alternatively, the above-ground volume may be reduced by analyzing the continuous simulation of 0.1Q2 to Q10 with EPA-SWMM. Both methods are recognized by the City. Ultimately, the bio-retention basin will comply with City of Chula Vista grading permit and Hydromodification requirements and will not increase flows or erosive potential to the existing drainage.</p> <p>The drainage study has evaluated the 100-year, 6-hour event for flood control and drainage conveyance sizing. As part of the permit process, the City of Chula Vista will also require evaluation of the 10-year and 50-year events. However, these analyses will not impact the flood control capacity of the bio-retention basin. The 100-year, 6-hour peak discharge rate of the proposed site does not increase from existing conditions.</p>	<p>The City requires that detention basins must a) be sized to detain a volume equivalent to runoff from the tributary area generated by an 85th percentile 24-hour event, and b) meet flow control criteria outlined in the <i>Coppermittees of San Diego County Hydromodification Management Plan</i> (Brown and Caldwell 2011). The water quality detention basin would reduce construction stormwater runoff such that runoff from the substation site would not cause flooding or exceed the capacity of the stormwater drainage system. Implementation of Mitigation Measure Hydro-3 would avoid offsite erosion caused by an overflowing detention basin. The impact from construction of the substation would be less than significant with mitigation.</p>	<p>downstream erosion resulting in a significant impact. Mitigation Measure Hydro-3 would require SDG&E to construct the detention basin to a size that would comply with the City of Chula Vista Development Stormwater Manual. The City requires that detention basins must a) be sized to detain a volume equivalent to runoff from the tributary area generated by an 85th percentile 24-hour event, and b) meet flow control criteria outlined in the Coppermittees <u>Coppermittees</u> of San Diego County Hydromodification Management Plan (Brown and Caldwell 2011). The water quality detention basin would reduce construction stormwater runoff such that runoff from the substation site would not cause flooding or exceed the capacity of the stormwater drainage system. Implementation of Mitigation Measure Hydro-3 would avoid offsite erosion caused by an overflowing detention basin. The impact from construction of the substation would be less than significant with mitigation.</p>
B1-122	Mitigation Measures: Hydro-1	4.9-17	1 st paragraph	<p>Delete the existing proposed measure and replace it with revised language. The proposed revision is standard language used by SDG&E as a project constraint for projects with access roads crossing through drainages. The revised language provides guidance on how to avoid permanent and temporary impacts to jurisdictional resources, and therefore permitting would not be required. In addition, the revision provides oversight by an aquatic monitor to ensure that driving through jurisdictional drainages during construction does not constitute a substantial impact. In particular, the revised language focuses on monitoring crossings after rain events, requiring a dry out period, and restricting access if needed.</p>	<p>Mitigation Measure Hydro-1: Overland crossings of drainages with vehicles and heavy equipment shall be conducted during the dry season (June 1 to October 15) or a temporary bridge shall be installed across the drainage. SDG&E shall consult with USACE, SDRWQCB, and CDFW and obtain any required permits or approvals prior to constructing a temporary bridge over any state or federally jurisdictional drainage. Waters of the U.S. and state shall be avoided during installation of the temporary bridge. SDG&E shall implement restoration and/or compensatory mitigation for temporary and permanent impacts to federally jurisdictional drainages associated with temporary bridge construction and use if impacts to waters cannot be avoided.</p>	<p>Overland crossings of drainages with vehicles and heavy equipment shall be conducted during the dry season (June 1 to October 15) or a temporary bridge shall be installed across the drainage. SDG&E shall consult with USACE, SDRWQCB, and CDFW and obtain any required permits or approvals prior to constructing a temporary bridge over any state or federally jurisdictional drainage. Waters of the U.S. and state shall be avoided during installation of the temporary bridge. SDG&E shall implement restoration and/or compensatory mitigation for temporary and permanent impacts to federally jurisdictional drainages associated with temporary bridge construction and use if impacts to waters cannot be avoided.</p> <p><u>When an access road crosses through a jurisdictional drainage feature, driving through the drainage is allowed, however conducting work activities, parking of vehicles, and staging of equipment, or the placement of fill of any sort, is not allowed within drainage features without acquiring appropriate State and Federal aquatic resource permits.</u></p> <p><u>If it becomes necessary to place a temporary bridge over a jurisdictional drainage during construction, the</u></p>

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B1-122 (cont.)						<p><u>bridge would be placed over the drainage, spanning the channel from bank to bank, avoiding the Ordinary High Water Mark (OHWM). Minor vegetation trimming may be required during placement of the bridge. An aquatic resource monitor will be present to provide guidance to the work crew during placement and removal of the bridge to avoid substantial impacts to the drainage.</u></p> <p><u>To avoid substantial impacts to jurisdictional drainages, crossing shall be avoided during periods of high flow, as determined by the aquatic resource monitor. After each rain event, drainage crossings will be evaluated for surface flows and ponding by the aquatic resource to determine if a dry-out period of 24 hours or more (full avoidance of the crossings) is required to avoid substantial impacts to the drainage crossings.</u></p>
4.10 – Land Use						
B1-123	4.10-5	4.10-10	Table 4.10-3	The difference in the elevation of the substation pad below Hunte Parkway is greater than stated in the DEIR. The substation pad ranges from approximately 485 to 492 from west to east across the northerly side. Hunte Parkway ranges from 533 to 539 across the same span. The elevation is therefore approximately 47 to 48 feet below Hunte Parkway.	The proposed substation would be located on a pad approximately 33 feet below the elevation of the adjacent Hunte Parkway and nearby residential neighborhoods, such that the substation would not be readily visible from residential neighborhoods.	The proposed substation would be located on a pad approximately 33 47 feet below the elevation of the adjacent Hunte Parkway and nearby residential neighborhoods, such that the substation would not be readily visible from residential neighborhoods.
4.11- Noise						
B1-124	Noise	4.11-31	MM Noise-3	Mitigation Measure Noise-3 should be limited to use of helicopters for pole installation in proximity to schools. Helicopter flight for the purpose of flying in the sock line should be allowed during school hours, as continuous movement would not be anticipated to disrupt school operations.	Mitigation Measure Noise-3: SDG&E shall coordinate with the Chula Vista Elementary School District and the Sweetwater Union High School District to schedule helicopter activities and TL 6965 construction activities (i.e., power pole installation and helicopter flight) within 300 feet of school properties to avoid days/times when school is in session to the extent practicable. To the extent feasible, construction activities that would result in a substantial increase in ambient noise levels at a nearby school would be scheduled during a school break.	Mitigation Measure Noise-3: SDG&E shall coordinate with the Chula Vista Elementary School District and the Sweetwater Union High School District to schedule helicopter activities (<u>other than over-flight</u>) and TL 6965 construction activities (i.e., power pole installation and helicopter flight) within 300 feet of school properties to avoid days/times when school is in session to the extent practicable. To the extent feasible, construction activities that would result in a substantial increase in ambient noise levels at a nearby school would be scheduled during a school break.
B1-125	Noise APM Noise-3	4.11-12	APM	APM Noise-3 was revised by the CPUC to note approval by the City and County of construction activities outside of the permissible local construction hours. SDG&E does	APM Noise-3: If construction activities are required outside of the permissible local construction hours, SDG&E will obtain approval from the City of Chula	APM Noise-3: If construction activities are required outside of the permissible local construction hours, SDG&E will obtain approval from <u>meet and confer</u>

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B1-125 (cont.)				not obtain noise permits or variances from local agencies and no approval is required. Therefore, SDG&E requests that “meet and confer” replace “obtain approval” in this measure.	Vista and the County of San Diego prior to conducting construction outside the permitted hours.	<u>with</u> the City of Chula Vista and the County of San Diego prior to conducting construction outside the permitted hours.
4.12 – Public Services						
B1-126	4.12.5	4.12-5	Construction Impacts	The duration of the closure of SR-125 is overstated in the DEIR. The freeway will not be closed for “a few hours.” Caltrans typically limits freeway closures to approximately 5 to 7 minute intervals and then re-opens the freeway to traffic. This process is then repeated to complete stringing the conductor across the freeway. Caltrans typically requires that freeway closures occur early on Sunday mornings.	Construction Construction of the project would not affect response times of emergency vehicles. The project would require temporary lane closures during power line stringing and construction of the underground distribution circuits. SR-125 could be closed for a few hours during power line stringing.	Construction Construction of the project would not affect response times of emergency vehicles. The project would require temporary lane closures during power line stringing and construction of the underground distribution circuits. Closure of SR-125 could be closed for a few hours <u>would be limited to short durations</u> as stipulated by Caltrans and the California Highway Patrol during <u>Patrol during</u> power line stringing.
4.13 – Recreation						
B1-127	4.13.5	4.13-9	Mitigation Measure REC 1	Mitigation Measure Recreation-1 should be revised to delete “unofficial trails” from the mitigation measure and should only apply to designated trails.	Mitigation Measure Recreation-1: SDG&E shall prepare a Pre-Project Trail Condition Report that documents the condition of designated and unofficial trails located within the project work area, prior to construction. The Pre-Project Trail Condition Report shall be submitted to CPUC 30 days prior to construction. SDG&E shall repair all damage to trails (e.g., rutting) caused by onstruction vehicles by the completion of construction. SDG&E shall prepare a Post-Project Trail Condition Report documenting the final state of all trails within the project work area and access roads. The Post-Project Trail Condition Report shall be submitted to the CPUC within 90 days of construction completion. SDG&E shall complete all trail repairs to the approval of CPUC.	Mitigation Measure Recreation-1: SDG&E shall prepare a Pre-Project Trail Condition Report that documents the condition of designated and unofficial trails located within the project work area, prior to construction. The Pre-Project Trail Condition Report shall be submitted to CPUC 30 days prior to construction. SDG&E shall repair all damage to trails (e.g., rutting) caused by construction vehicles by the completion of construction. SDG&E shall prepare a Post-Project Trail Condition Report documenting the final state of all trails within the project work area and access roads <u>designated trails included in the Pre-Project Trail Condition Report that were utilized during construction</u> . The Post-Project Trail Condition Report shall be submitted to the CPUC within 90 days of construction completion. SDG&E shall complete all trail repairs to the approval of CPUC.
B1-128	Recreation	4.11-27		The CPUC has concluded that there will be significant and unavoidable recreational impacts associated with use of the SDG&E access roads, including the transmission corridor access road east of the proposed substation. While the access road may be informally used as a trail, these trails are not officially designated trails and are not maintained as such. SDG&E understands that the general public may benefit from informal use of utility access roads in proximity to open space, and supports the need		

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B1-128 (cont.)				for signage and notification of access road closure during construction. However, temporary closure of, and impacts to, the utility access roads should not be considered a significant recreational impact. SDG&E and other utilities will continue to rely upon this access road in the future. Therefore, mitigation is unnecessary.		
B1-129	Recreation	4.13-2, 4.13-11	Multiple	<p>Impact Recreation-3 and Impact Recreation-4 do not appear to relate to established significance criteria. Further, they seem to be focused on noise and visual resource impacts that are already addressed in other sections. Impact Recreation-3 concludes a significant and unavoidable noise impact to recreational trail users from construction noise. However, trail users are not included as a sensitive receptor in the noise section. The trails near the substation are in proximity to roadways and development, the transmission corridor trail is a functioning utility corridor where maintenance and construction are anticipated, and the trail users that may access the transmission corridor are highly mobile and would not be subject to increased noise levels for an extended period of time. This impact should not be considered significant. Further, Mitigation Measure Noise-2 requires construction of noise walls when residences are within 200 feet. Per this measure, no noise walls would be constructed along the transmission corridor utility access road in the vicinity of the substation, as implied in the second paragraph on page 4.13-11.</p> <p>The sections related to Recreation-3 and Recreation-4 should be deleted from the Recreation Section.</p>		
4.14 – Transportation and Traffic						
B1-130	Traffic Trip Generation	4.14-12	Table 4.14-7	Table 4.14-7 references a maximum of 27 supply trips per day for substation construction. SDG&E submitted a data request response on October 18, 2013 clarifying that 27 supply trucks would be more of an average over the 6 months of construction. During peak hauling periods, it is possible up to 120 haul trucks may be relied upon in a day.	27 Large Supply Trucks	27 Large Supply Trucks 120 Haul Trucks
4.15 – Utilities and Service Systems						
B1-131	4.15.5	4.15-5	1 st paragraph under “Alternating Currents”	The CPUC states that pipelines are protected when the current density (CD) is lower than 20 A/m ² . SDG&E’s AC Interference Analysis, conducted by ARK Engineering (March 26, 2014) states that European Standard CEN/TS	Pipelines are considered protected from AC corrosion if the root mean square (RMS) AC density is lower than 20 amperes per square meter (A/m ²) (ARK 2014a).	Based on European Standard CEN/TS 15280 guidelines Pipelines are considered protected from AC corrosion if the root mean square (RMS) AC density is lower than 30 amperes per square meter

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B1-131 (cont.)				<p>15280 offers the following guidelines: A pipeline is considered protected from AC corrosion when CD is less than 30 A/m². CEN/TS 15280 goes further and says that in practice, the evaluation of AC corrosion likelihood is done on a broader basis:</p> <ul style="list-style-type: none"> • CD < 30 A/m²: no or low likelihood of AC Corrosion effects • CD between 30~100 A/m²: medium likelihood of AC Corrosion effects • CD > 100 A/m²: very high likelihood of AC Corrosion effects 		<p><u>(A/m²) (ARK 2014a). In practice, the evaluation of AC corrosion likelihood is done on a broader basis in which current densities lower than 30 A/m² result in no or low likelihood of AC corrosion and current densities between 30 and 100 A/m² result in medium likelihood of AC corrosion.</u></p>
B1-132	4.15.5	4.15-12	Operation and Maintenance	<p>The Draft EIR states that a significant impact would occur if current densities exceed n20 A/m². We request the significant threshold level be increased to 30 A/m² in alignment with the European Standard CEN/TS 15280.</p>	<p>A significant impact would occur if current densities would exceed the threshold of 20 A/m² as a result of the proposed project.</p>	<p>A significant impact would occur if current densities would exceed the threshold of 20<u>30</u> A/m² as a result of the proposed project.</p>
B1-133	4.15.5	4.15-14	1 st paragraph under Mitigation Measures: Utilities-1 and Utilities-2	<p>Outages are difficult to coordinate too far in advance because various conditions can warrant cancellation. Thus, communication occurs closer to the time of the outage so as to minimize repeated changes. See language to the right for minimum notification time frames. Finally, notifications are only for distribution outages as that is what directly impacts customers.</p>	<p>Prior to construction in which a utility service interruption is known to be unavoidable, SDG&E shall notify members of the public affected by the planned outage at least 30 days prior to the impending interruption.</p>	<p>Prior to construction in which a utility <u>distribution</u> service interruption is known to be unavoidable, SDG&E shall notify members of the public affected by the planned outage at least 30<u>35</u> <u>calendar</u> days prior to the impending interruption <u>for residential outages and 10 calendar days prior to the impending interruption for commercial outages.</u></p>
B1-134	4.15.-5	4.15-14	Mitigation Measure Utilities 3	<p>The SDCWA does not own the property, but rather has easements from the City of Chula Vista. Therefore, no easements are required from SDCWA for SDG&E's access. SDG&E already has an easement from the City of Chula Vista for transmission lines and access.</p> <p>While the existing access road is temporarily closed for improvements, the City will need to use the transmission corridor access road(s) to the point where they intersect the existing sewer access road south of our property. Since the City will have access through the transmission corridor during the period when SDG&E is improving the access road to the substation, there is noneed to build a secondary access road.</p>	<p>Mitigation Measure Utilities-3: SDG&E shall acquire easements for access roads owned by SDCWA and the City of Chula Vista prior to use of these roads. SDG&E shall construct a secondary access road to the City of Chula Vista sewer access road and maintain City of Chula Vista access to buried sewer lines throughout the duration of construction.</p>	<p>Mitigation Measure Utilities-3: SDG&E shall acquire easements for access roads owned by <u>from the</u> SDCWA and the City of Chula Vista prior to use of these roads, <u>as needed</u>. SDG&E shall construct a secondary access road to the City of Chula Vista sewer <u>access road and</u> maintain City of Chula Vista access to buried sewer lines throughout the duration of construction.</p>
6 – Comparison of Alternatives						
B1-135	7.3.1 [Apparently a typo: should be 6.3.1]	6-5	Second paragraph	Regarding Alternative 1	Alternative 1 would reduce or eliminate the following environmental impacts of the proposed project:	Alternative 1 would reduce or eliminate the following environmental impacts of the proposed project:

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B1-135 (cont.)					<ul style="list-style-type: none"> Eliminates temporary significant and unavoidable substantial increase in noise at schools, parks, and over 1,000 residents within 200 feet of the transmission corridor, even though the alternative would result in a substantial temporary and permanent increase in noise for receptors near the substation during construction; noise levels near the substation would be similar to the proposed project Eliminates helicopter noise along the power line and near staging yards Eliminates the aesthetic impact of an additional power line in the transmission corridor Reduces biological impacts by eliminating temporary and permanent habitat impacts and noise impacts on wildlife along the 5-mile-long power line Eliminates impacts on all eligible cultural resources in the proposed project area Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines Eliminates impacts from trail detours and closures and noise and aesthetic impacts on recreational facilities within and near the transmission corridor north of Hunte Parkway Eliminates the need for temporary road or lane closures associated with power line stringing Reduces conflicts with utilities in the utility corridor 	<ul style="list-style-type: none"> Eliminates temporary significant and unavoidable substantial increase in noise at schools, parks, and over 1,000 residents within 200 feet of the transmission corridor, even though the alternative would result in a substantial temporary and permanent increase in noise for receptors near the substation during construction; noise levels near the substation would be similar to the proposed project Eliminates helicopter noise along the power line and near staging yards Eliminates the aesthetic impact of an additional power line in the transmission corridor Reduces biological impacts by eliminating temporary and permanent habitat impacts and noise impacts on wildlife along the 5-mile-long power line Eliminates impacts on all eligible cultural resources in the proposed project area Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines Eliminates impacts from trail detours and closures and noise and aesthetic impacts on recreational facilities within and near the transmission corridor north of Hunte Parkway Eliminates the need for temporary road or lane closures associated with power line stringing Reduces conflicts with utilities in the utility corridor
B1-136	7.3.3 [Apparently a typo: should be 6.3.1]	6-7	Bullets after first paragraph	Regarding Alternative 3	<ul style="list-style-type: none"> Eliminates the aesthetic impact of a new power line in the transmission corridor Reduces noise impacts on sensitive receptors by eliminating the use of helicopters for power line stringing Reduces impacts on cultural resources by avoiding the CRHR - eligible resources within the transmission corridor; Alternative 3 construction is less likely to encounter resources than the proposed project because the work area was previously disturbed by road construction Reduces impacts on native habitats by avoiding the temporary and permanent habitat impacts in the 	<ul style="list-style-type: none"> Eliminates the aesthetic impact of a new power line in the transmission corridor Reduces noise impacts on sensitive receptors by eliminating the use of helicopters for power line stringing Reduces impacts on cultural resources by avoiding the CRHR - eligible resources within the transmission corridor; Alternative 3 construction is less likely to encounter resources than the proposed project because the work area was previously disturbed by road construction Reduces impacts on native habitats by avoiding the temporary and permanent habitat impacts in the

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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B1-136 (cont.)					transmission corridor <ul style="list-style-type: none"> Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines 	transmission corridor <ul style="list-style-type: none"> Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines
B1-137	Table 6.5-1	6-9	Alternative 3 Column	The Proposed Project will have fewer emissions over the life of the project than will Alternative 2, so the Proposed Project should be ranked second, ahead of Alternative 2.	Proposed Project: Air Quality Ranking = 3; Alternative 2 Air Quality Ranking = 2	Proposed Project: Air Quality Ranking = <u>3</u> ; Alternative 2 Air Quality Ranking = <u>2</u>
B1-138	6	6-15	First Paragraph	The narrative implies that Alternative 2 would avoid the significant and unavoidable noise impacts associated with the Proposed Project. In fact, it would only avoid a portion of those impacts, which would remain significant and unavoidable for Alternative 2.	Alternative 2 would avoid significant and unavoidable impacts from the substantial temporary and periodic increase in ambient noise levels along the power line corridor.	Alternative 2 would avoid significant and unavoidable impacts from the substantial temporary and periodic increase in ambient noise levels along the power line corridor.
9 – Mitigation Monitoring and Reporting Program (the edits recommended below in Section 9 should also be incorporated into the corresponding chapter of Section 4 of the EIR)						
B1-139	9.2 Minor Project Modifications	9-2	First Paragraph	Since the intent of the section is to determine if supplemental CEQA review is required, the criteria language should be consistent the CEQA Guidelines Section 15162(a), <i>Subsequent EIRs and Negative Declarations</i> .	A minor project modification should be strictly limited to minor project changes that will not trigger other permit requirements, unless the appropriate agency has approved the change; that does not increase the severity of an impact or create a new impact without appropriate agency approval; and that complies with the intent of the mitigation measure.	A minor project modification should be strictly limited to minor project changes that will not trigger other <u>additional, unanticipated</u> permit requirements, unless the appropriate agency has approved the change; that does not increase the severity of an impact or create a new impact without appropriate agency approval <u>result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS;</u> and that complies with the intent of the mitigation measure.
B1-140	9.4 Compliance with NCCP and Permit Conditions	9-4	First Paragraph	This change in language will avoid duplicative and unnecessary reporting.	If the CPUC determines that compliance with permit conditions will also satisfy the mitigation measures in this EIR, SDG&E shall submit reports to the CPUC documenting compliance consistent with the reporting requirements of the equivalent mitigation measure or measures.	If the CPUC determines that compliance with permit conditions will also satisfy the mitigation measures in this EIR, SDG&E shall submit reports to the CPUC documenting compliance consistent with the reporting requirements of the equivalent mitigation measure or measures. <u>evidence of compliance in the weekly and monthly reports to the CPUC as required by the MMCRP. In addition, SDG&E will provide copies to the CPUC of reports required by the aforementioned permits if requested.</u>
B1-141	9.4	9-40	2 nd row (MM Noise-1)	SDG&E is recommending minor revisions to Mitigation Measure Noise-1. Recent past projects have demonstrated SDG&E's ability to satisfy the public's concerns through its noticing about major project construction activities along the project alignment allowing construction to remain flexible to schedule while maintaining noise mitigations and satisfying the scope and specifics of construction activities.	Mitigation Measure Noise-1: SDG&E shall provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging yards, helicopter fly yards, and access roads at least one week prior to construction activities. SDG&E shall also post notices in public areas, including recreational use areas, within 300 feet of the project alignment and construction work areas. The announcement shall state	Mitigation Measure Noise-1: SDG&E shall provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging yards, helicopter fly yards, and access roads at least one week prior to construction activities. SDG&E shall also post notices in public areas, including recreational use areas, within 300 feet of the project alignment and construction work areas <u>SDG&E's right-of-way near</u>

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B1-141 (cont.)					specifically where and when construction will occur in the area. For areas that would be exposed to helicopter noise, the announcement shall provide specific details on the schedule of the dates, times, and duration of helicopter activities. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.	<p>designated trails and public parks. The announcement shall state specifically where and when construction will occur in the area. For areas that would be exposed to helicopter noise, the announcement shall provide specific details on the schedule of the dates, times, and duration of helicopter activities. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.</p> <p>SDG&E shall identify and provide a public liaison person before and during construction through project energization to respond to concerns of neighboring receptors, including residents, about noise construction disturbance. SDG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction through project energization and develop procedures for responding to callers. Procedures for reaching the public liaison officer via telephone or in person shall be included in the above notices and also posted conspicuously at the construction site(s).</p> <p>SDG&E will address all complaints in a within one week of when the complaint is filed. SDG&E shall provide monthly reports with records of complaints and responses to the CPUC. These reports shall be provided to CPUC within 15 days of the end of the month.</p>
B1-142	9.4	9-5	MM Aesthetics-1	Mitigation Measure Aesthetics-1 should be revised to clarify that landscaping will only partially screen views of the substation.	Mitigation Measure Aesthetics-1: SDG&E shall submit a Landscaping and Irrigation Plan to the CPUC for review and approval no less than 30 days prior to construction. The purpose of the Landscaping and Irrigation Plan is to ensure successful revegetation of the substation slope to screen the facility from view within a period of 5 years after construction.	Mitigation Measure Aesthetics-1: SDG&E shall submit a Landscaping and Irrigation Plan to the CPUC for review and approval no less than 30 days prior to construction. The purpose of the Landscaping and Irrigation Plan is to ensure successful revegetation of the substation slope to <u>partially</u> screen the facility from view within a period of 5 years after construction.
B1-143	9.4	9-6, 9-7	MM Aesthetics-2	Mitigation Measure Aesthetics-2 is for facility buildings, walls and fences. Poles/towers are covered by MM Aesthetics-4. Therefore, the reference to poles/towers should be deleted. Also, it should be clarified that specifications for verdura retaining wall and masonry walls material color will be based on standard color palettes from the providers. In addition, text should be revised to reflect that simulations will be to scale instead	SDG&E shall prepare a Facilities Color Treatment Plan describing the application of colors to all new facility buildings, walls and fences at the Salt Creek Substation. The proposed color treatments shall minimize visual intrusion and contrast by blending the facilities with the landscape. The Plan shall be submitted to CPUC for review and approval at least 90 days prior to (a) ordering the first exterior building	SDG&E shall prepare a Facilities Color Treatment Plan describing the application of colors to all new facility buildings, walls and fences at the Salt Creek Substation. The proposed color treatments shall minimize visual intrusion and contrast by blending the facilities with the landscape. Specifications for verdura retaining wall and masonry walls material color will be based on standard color palettes from the providers.

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B1-143 (cont.)				of “life size”.	<p>components to be color treated, or (b) construction of any exterior building component, whichever comes first. The Facilities Color Treatment Plan shall include:</p> <ul style="list-style-type: none"> • Specification, and 11 x 17 inch color simulations at life-size scale, of the treatment proposed for use on project structures • List of each major project structure, building, tower and/or pole, and fencing specifying the color(s) and finish proposed for each (colors must be identified by name and by vendor brand or a universal designation) 	<p>The Plan shall be submitted to CPUC for review and approval at least 90 days prior to (a) ordering the first exterior building components to be color treated, or (b) construction of any exterior building component, whichever comes first. The Facilities Color Treatment Plan shall include:</p> <ul style="list-style-type: none"> • Specification, and 11 x 17 inch color simulations at life-sizeto scale, of the treatment proposed for use on project structures • List of each major project structure, building, tower and/or pole, and fencing specifying the color(s) and finish proposed for each (colors must be identified by name and by vendor brand or a universal designation)
B1-144	9.4	9-7	OM Aesthetics -1 (and APM AES-1)	No screening should be required for the Miguel Staging Yard given its remote location and distance from roads and residences.	Optional Measure Aesthetics-1: SDG&E should install opaque mesh along the fence of all staging yards used for the proposed project to screen the view of the staging yards from public vantage points, such as roads.	Optional Measure Aesthetics-1: SDG&E should install opaque mesh along the fence of all staging yards, <u>except for the Miguel Staging Yard,</u> used for the proposed project to screen the view of the staging yards from public vantage points, such as roads.
B1-145	9.4	9-39	MM Hydro-3	SDG&E is recommending deletion of the partial list of Stormwater measures specified in Mitigation Measure Hydro-3 since it appears to limit SDG&E’s options in the design rather than allowing all of the measures allowed and dictated by the City of Chula Vista’s Development Storm Water Manual.	<p>Mitigation Measure Hydro-3: The water detention basin to be installed at the substation site shall be designed in accordance with the City of Chula Vista Development Stormwater Manual, which approves use of the following types of stormwater facilities:</p> <ul style="list-style-type: none"> • Infiltration facilities or practices, including dry wells, infiltration trenches, infiltration basins, and other facilities that infiltrate runoff to native soils (sized to detain and infiltrate a volume equivalent to the 85th percentile 24-hour event) • Bioretention facilities and media filters that detain stormwater and filter it slowly (at the rate of about 5 inches per hour) through soil or sand (sized with a surface area of at least 0.04 times the effectively impervious tributary area, or as approved by the City Engineer) • Extended detention basins, wet ponds, and wetlands or other facilities using settling (sized to detain a volume equivalent to runoff from the tributary area generated by the 85th percentile 24-hour event) 	<p>Mitigation Measure Hydro-3: The water detention basin to be installed at the substation site shall be designed in accordance with the City of Chula Vista Development Storm water Manual, which approves use of the following types of stormwater facilities:</p> <ul style="list-style-type: none"> • Infiltration facilities or practices, including dry wells, infiltration trenches, infiltration basins, and other facilities that infiltrate runoff to native soils (sized to detain and infiltrate a volume equivalent to the 85th percentile 24-hour event) • Bioretention facilities and media filters that detain stormwater and filter it slowly (at the rate of about 5 inches per hour) through soil or sand (sized with a surface area of at least 0.04 times the effectively impervious tributary area, or as approved by the City Engineer) • Extended detention basins, wet ponds, and wetlands or other facilities using settling (sized to detain a volume equivalent to runoff from the tributary area generated by the 85th percentile 24-hour event)
B1-146	9.4	9-7	MM Aesthetics-3	SDG&E respectfully requests that Mitigation Measure	Mitigation Measure Aesthetics-3: SDG&E shall	Mitigation Measure Aesthetics-3: SDG&E shall

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B1-146 (cont.)				<p>Aesthetics-3 be removed, so that non-dulled steel may be used in construction of the Salt Creek Substation. Non-dulled steel will in fact dull over time (our supplier estimates within an estimated 12 to 14 months depending on weather conditions), is less expensive, and does not require chemical treatment prior to installation.</p> <p>Alternatively, if non-dulled steel is required, SDG&E asks that the Mitigation Measure be modified so that SDG&E may submit proof of purchase and a description of the dulled steel process used by the manufacturer at the time the order is placed, rather than being required to provide three samples.</p>	<p>submit to the CPUC a Surface Treatment Plan describing the structural steel specifications used at the Salt Creek Substation. Steel specifications in the Surface Treatment Plan must reduce the potential for daytime structural glare. The Surface Treatment Plan shall include samples showing at least three (3) samples of post-production dulling agents applied to the steel structural members. Finishes will be durable, factory or manufacturer-applied, of an appropriate color, and non-specular. The Surface Treatment Plan will also include maintenance and inspection protocols. The Surface Treatment Plan shall be submitted to the CPUC for approval at least 90 days prior to (a) ordering the first structures, or (b) construction of the Salt Creek Substation, whichever comes first. The CPUC shall approve the Surface Treatment Plan, or otherwise inform SDG&E what modifications to the Surface Treatment Plan are necessary, within 30 days after the Plan’s submittal by SDG&E. SDG&E shall not begin construction of the Salt Creek Substation until the Plan has been approved by the CPUC.</p>	<p>submit to the CPUC a Surface Treatment Plan describing the structural steel specifications used at the Salt Creek Substation. Steel specifications in the Surface Treatment Plan must reduce the potential for daytime structural glare. The Surface Treatment Plan shall include samples showing at least three (3) samples of post-production dulling agents applied to the steel structural members. Finishes will be durable, factory or manufacturer-applied, of an appropriate color, and non-specular. The Surface Treatment Plan will also include maintenance and inspection protocols. The Surface Treatment Plan shall be submitted to the CPUC for approval at least 90 days prior to (a) ordering the first structures, or (b) construction of the Salt Creek Substation, whichever comes first. The CPUC shall approve the Surface Treatment Plan, or otherwise inform SDG&E what modifications to the Surface Treatment Plan are necessary, within 30 days after the Plan’s submittal by SDG&E. SDG&E shall not begin construction of the Salt Creek Substation until the Plan has been approved by the CPUC.</p>
B1-147	MM AES 1	9-5	APM/MM Column	<p>As landscaping is one of the last components of the project, SDG&E requests that the review period be pushed to “prior to installation”. This would allow some time to make sure all the plant material is available before the landscape plan is finalized, thereby minimizing potential revisions.</p>	<p>“no less than 30 days prior to construction”</p>	<p>“no less than 30 days prior to constructionlandscape installation”</p>
B1-148	Optional MM AES 1	9-7	APM/MM Column	<p>As the impacts from the OTC Staging yard (4.1-46) are already considered less than significant without mitigation measures, this optional mitigation measure is not necessary and should be deleted.</p>	<p>Optional Measure Aesthetics-1: SDG&E should install opaque mesh along the fence of all staging yards used for the proposed project to screen the view of the staging yards from public vantage points, such as roads.</p>	<p>Optional Measure Aesthetics-1: SDG&E should install opaque mesh along the fence of all staging yards used for the proposed project to screen the view of the staging yards from public vantage points, such as roads</p>
B1-149	APM – Air 1	9-7, 9-8	APM/MM Column	<p>The Air Quality Management, Project Design Feature and Ordinary Construction/Operations Feature, as defined in the PEA (3-65) was synthesized to create the DEIR “APM”. There were important elements that were not retained in the DEIR version of the APM. SDG&E requests to keep the full text of the PEA Project Design Feature so as not to change SDG&E self-imposed measure which has an established record for protecting air quality.</p>	<p>All unpaved demolition and construction areas will be wetted as needed to reduce fugitive dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements. All earthen material transported off-site will be secured by covering or use of at least 2 feet of freeboard to avoid carry-over. All earth-moving or excavation activities that create visible dust will be discontinued to limit fugitive dust from leaving the project site.</p>	<p>All unpaved demolition and construction areas will be wetted as needed to reduce fugitive dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements. All earthen material transported off-site will be secured by covering or use of at least 2 feet of freeboard to avoid carry-over. All earth-moving or excavation activities that create visible dust will be discontinued to limit fugitive dust from leaving the project site.</p> <p>• All unpaved demolition and construction areas shall be wetted at least three times daily during</p>

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B1-149 (cont.)						<p><u>construction, and temporary dust covers shall be used to reduce dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements.</u></p> <ul style="list-style-type: none"> <u>SDG&E or its contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable dust control of areas subject to windblown erosion.</u> <u>All loads shall be secured by covering or use of at least 2 feet of freeboard to avoid carry-over.</u> <u>All materials transported off-site shall be either sufficiently watered or securely covered.</u> <u>All earthmoving or excavation activities shall be discontinued during period of high winds (i.e., greater than 25 mph) to prevent excessive amounts of fugitive dust generation.</u>
B1-150	APM AIR-3	9-8	APM/MM Column	The Air Quality Management, Project Design Feature and Ordinary Construction/Operations Feature, as defined in the PEA (3-65) was synthesized to create the DEIR “APM”. There were additional elements that were added in the DEIR version of the APM. SDG&E requests to keep the original text of the PEA Project Design Feature so as not to change SDG&E self-imposed measure which has an established record of protecting air quality.	Coatings, sealants, adhesives, solvents, asphalt, and architectural coatings will be in conformance with CARB’s Suggested Control Measure for Architectural Coatings, and with SDAPCD’s VOC Rules 61, 66.1, 67.0, and 67.17.	<p>Coatings, sealants, adhesives, solvents, asphalt, and architectural coatings will be in conformance with CARB’s Suggested Control Measure for Architectural Coatings, and with SDAPCD’s VOC Rules 61, 66.1, 67.0, and 67.17.</p> <p><u>Low- and non-volatile organic compound (VOC)-containing coatings, sealants, adhesives, solvents, asphalt, and architectural coatings shall be used to reduce VOC emissions.</u></p>
B1-151	MMRP – APM HAZ 1	9-36	APM/MM Column	<p>Although the definition of the SPCC plan is correct as described in the PEA Page 3-67, it is unfortunately described inaccurately in the PEA on page 3-51 and it appears that this APM as drafted for the DEIR was derived from page 3-51 of the PEA. In this instance, an SPCC would not be the appropriate document to use, as described below. SDG&E proposes changing the name of this document to the Hazardous Substance Management and Emergency Response Plan.</p> <p>An SPCC will be developed when and if project construction triggers regulatory requirements, such as storage of hazardous substance above 1,320 gallons. In addition, SDG&E typically develops an SPCC once the substation is in the operational phase or as applicable by regulation.</p>	<p>APM HAZ-1: Spill Prevention, Control, and Countermeasure Plan: A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared prior to project construction and that addresses response procedures in the event of any release or spill of hazardous materials during construction. The SPCC plan will establish procedures, methods, equipment requirements, and worker training to prevent spills or leaks from reaching waterways and leaving the site.</p>	<p>APM HAZ-1: Spill Prevention, Control, and Countermeasure Plan: A Spill Prevention, Control, and Countermeasure (SPCC) Plan <u>Hazardous Substance Management and Emergency Response Plan: A Hazardous Substance Management and Emergency Response Plan (HSMER)</u> will be prepared prior to project construction and that addresses response procedures in the event of any release or spill of hazardous materials during construction. The SPCC <u>HAZSMER</u> plan will establish procedures, methods, equipment requirements, and worker training to prevent spills or leaks from reaching waterways and leaving the site.</p>

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B1-152	MMRP – Traffic	9-42	MM/APM Column	This measure should only be “if required and applicable per consultation with Caltrans”.	Mitigation Measure Traffic-1: SDG&E shall prepare and submit to Caltrans a Highway Closure Plan as part of the encroachment permit application. The plan shall require that closure or partial closure of SR-125 be limited to off-peak, non-daytime hours, from 10 p.m. to 5 a.m., and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. The plan shall also outline suggested detours for SR-125 traffic, including routes and signage. SDG&E shall provide evidence of Caltrans approval of the plan to CPUC at least 15 days prior to initiating installation of the crossings.	Mitigation Measure Traffic-1: SDG&E shall prepare and submit to Caltrans a Highway Closure Plan <u>if applicable and if required</u> as part of the encroachment permit application. The plan shall require that closure or partial closure of SR-125 be limited to off-peak, nondaytime hours, from 10 p.m. to 5 a.m., and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. The plan shall also outline suggested detours for SR-125 traffic, including routes and signage. SDG&E shall provide evidence of Caltrans approval of the plan to CPUC at least 15 days prior to initiating installation of the crossings.
Errata						
B1-153	2.7.6	2-38, 2-39	Foundation Construction	Remove and rephrase the following sentence.	Steel plating would be placed over excavated holes prior to pole installation.	Steel plating would be placed over excavated holes prior to pole installation. <u>If the foundation excavation is left open, prior to concrete placement, the excavation will be covered and secured.</u>
B1-154	2.7.6	2-38, 2-39	Foundation Construction	Revise the current sentence.	Concrete would be poured for the foundation, extending approximately 6 to 24 inches above-grade.	Concrete would be poured <u>placed</u> for the foundation, extending approximately 6 <u>18</u> to 24 inches above-grade.
B1-155	Table 2.10-1	2-53	Required Permits and Approvals	Revise the table number, as it applies to Section 2.9, not 2.10.	Table 2.10-1	Table 2.10-1 <u>2.9-1</u>
B1-156	2.10.4	2-55	Electric and Magnetic Fields Research	Revise the existing sentence to include the World Health Organization.	In an effort to determine whether health standards are necessary, agencies such as the CPUC, California Department of Health Services (CDHS), the U.S. Environmental Protection Agency (EPA), and the National Institute of Environmental Health Sciences (NIEHS), have reviewed the research.	In an effort to determine whether health standards are necessary, agencies such as the CPUC, California Department of Health Services (CDHS), the U.S. Environmental Protection Agency (EPA), and the National Institute of Environmental Health Sciences (NIEHS), <u>and the World Health Organization (WHO)</u> , have reviewed the research.
B1-157	2.10.6	2-55	Electric and Magnetic Fields Associated with the Proposed Project	Revise the existing sentence to include the distribution circuits associated with the proposed substation.	The specific EMF sources associated with the proposed project consist of a new 69-kV power line within the SDG&E utility corridor, the loop-in of TL 6910 underground into the new substation, and equipment within the substation.	The specific EMF sources associated with the proposed project consist of a new 69-kV power line within the SDG&E utility corridor, the loop-in of TL 6910 underground into the new substation, <u>the distribution circuits associated with the proposed substation</u> , and equipment within the substation.
B1-158	2.10.6	2-55, 2-56	Electric and Magnetic Fields Associated with the Proposed Project	Revise the existing paragraph and bullet list to be consistent with SDG&E's EMF Design Guidelines for Electrical Facilities.	The CPUC issued decisions regarding EMF in 1993 (D.93-11-013) and 2006 (D.06-01-042)...four percent of total project cost. The following are examples of possible EMF reduction measures in accordance with CPUC Decision 93-11-013:	The CPUC issued decisions regarding EMF in 1993 (D.93-11-013) and 2006 (D.06-01-042)...four percent of total project cost. The following are examples of possible EMF reduction measures <u>identified in SDG&E's EMF Design Guidelines for Electrical</u>

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B1-158 (cont.)					<ul style="list-style-type: none"> • Increase distance from conductors and equipment • Reduced conductor spacing • Minimize current in conductors • Optimize phase configuration • Maximize distance between aboveground conductors at substations and the public ROW • Maximize distance between underground cables and nearby sidewalks and buildings • Increase burial depth of the duct bank • Increase distance between overhead conductors and the ground 	<p><u>Facilities</u> in accordance with CPUC Decision D.93-11-013 <u>and D.06-01-042</u>:</p> <ul style="list-style-type: none"> • Increase distance from conductors and equipment • Reduced conductor spacing • Minimize current in conductors • Optimize phase configuration • Maximize distance between aboveground conductors at substations and the public ROW • Maximize distance between underground cables and nearby sidewalks and buildings • Increase burial depth of the duct bank • Increase distance between overhead conductors and the ground <p><u>A) Increasing the distance from electrical facilities by:</u> <u>a. Increasing structure height or trench depth.</u> <u>b. Locating power lines closer to the centerline of the corridor.</u> <u>B) Reducing conductor (phase) spacing.</u> <u>C) Phasing circuits to reduce magnetic fields.</u></p>
B1-159	3.4.1	3-9	Top of the page	There appears to be text missing at the top of the page as it starts mid-sentence.		
B1-160	3.4.3	3-14	2nd paragraph	The description of the undergrounding in Alternative 3 should be revised to accurately describe the extent of the location of the overhead line since it extends a short distance outside of the substation property southerly to Mt. Miguel Road.	The proposed 69-kV line would be overhead within the Miguel Substation in the same configuration as the proposed project. At the edge of the Miguel Substation, the power line would transition underground via a cable pole.	The proposed 69-kV line would be overhead within on the Miguel Substation property <u>and continue southerly</u> in the same configuration as the proposed project to Mt. At the edge of the Miguel Substation Road. At Mt. Miguel Road, the power line would transition underground via a cable pole.
B1-161	4.1.5	4.1-23	Impact Assessment	Table 4.1-7 analyzes the substation, not the power line.	Table 4.1-7 provides the level of visual impact resulting from addition of the proposed power line.	Table 4.1-7 provides the level of visual impact resulting from addition of the proposed power line <u>substation</u> .
B1-162	Air Quality	4.3-7	Table 4.3-4	The table incorrectly lists the primary annual NAAQS for PM2.5 as 15 µg/m3. The NAAQS was revised in 2012. The primary standard is 12.0 µg/m3. The form of the annual standards is the annual mean, averaged over 3 years.		
B1-163	4.4 BIO Sensitive Wildlife Impacts	4.4-55	2	Mitigation Measure Biology-7 is incorrectly referenced. It should refer to Mitigation Measure Biology-6.	Mitigation Measure Biology-7	Mitigation Measure Biology- 7 <u>6</u>
B1-164	4.4 BIO	4.4-19	4th paragraph	Second sentence under heading of “SDG&E’s Subregional Natural Community Conservation Plan”. Change NNCP to	“The SDG&E Subregional NCCP was approved in December 1995 and was established according to the	“The SDG&E Subregional NCCP was approved in December 1995 and was established according to the

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B1-164 (cont.)				NCCP.	federal ESA, the CESA, and the NCCP Act. The NNCP authorizes certain levels of take of 110 covered species that may be affected by SDG&E's ongoing activity impacts including...."	federal ESA, the CESA, and the NCCP Act. The NNCP NCCP authorizes certain levels of take of 110 covered species that may be affected by SDG&E's ongoing activity impacts including...."
B1-165	4.4 BIO	4.4-19	3rd paragraph	Under heading of "City of Chula Vista General Plan". It is important to note that the proposed Salt Creek Substation site is located within an area designated for development by the General Plan.	The overarching objective of the City's General Plan Environmental Element is to "conserve Chula Vista's sensitive biological resources" by implementing the City's MSCP Subarea Plan (City of Chula Vista 2003). The MSCP Subarea Plan was adopted by the City as a component of the General Plan in May 2003 and is discussed below.	<u>The substation is proposed to be located outside of the MSCP preserve in an area designated for development.</u> The overarching objective of the City's General Plan Environmental Element is to "conserve Chula Vista's sensitive biological resources" by implementing the City's MSCP Subarea Plan (City of Chula Vista 2003). The MSCP Subarea Plan was adopted by the City as a component of the General Plan in May 2003 and is discussed below.
B1-166	Biology			2014 surveys, conducted by SDG&E's environmental consultant, for burrowing owl, California gnatcatcher, least Bell's vireo and rare plants were provided to the CPUC on March 18, 2015.		
B1-167	Surveys	4.5-4	3	Add an "s" after "resource"	...impacts to cultural resource within the project area.	...impacts to cultural resource resources within the project area.
B1-168	4.6.1	4.6-8	Paragraph-2	The DEIR states that "fill materials present along portions of the access roads are clays primarily associated with construction of Hunte Parkway." To clarify, this statement was from Section 3.4.1 of the 2008 Kleinfelder report and refers to access roads in the vicinity of the proposed Salt Creek Substation. This statement does not necessarily relate to potential fill soils encountered along access roads along the entire TL6965 alignment.		
B1-169	4.6.1	4.6-12	Paragraph-5	Under the heading "Ground Motion," the text contains the following two sentences that are outdated based on the current standard of practice for ground motion evaluation: "San Diego County is entirely located in Seismic Zone 4, as defined by the most recent Uniform Building Code. Seismic Zone 4 areas include those closest to active faults that are expected to experience ground motion during an earthquake of at least 0.40g (g is the acceleration due to gravity)." Ground motion references should be derived from the most recent California Building Code.		
B1-170	Alt 1	4.6-31	TL 6965	"Alternative 1 would avoid unstable soil units only found along the transmission line corridor..." Please consider rephrasing this sentence. "Unstable" is a strong word considering there are existing overhead utility lines and		

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B1-170 (cont.)				two pipelines in the corridor.		
B1-171	Alt 2	4.6-32	6	Same as comment 118 above regarding page 4.6-31.		
B1-172	Alt 3	4.6-36	69 kV UG	Please consider revising the statement. "Construction of the underground power line within roadways could destabilize soils..." It seems inconsistent with other areas of analysis, such as the analysis on the following page under the No Project Alternative that concludes distribution duct banks built in existing roadways would have minimal impact because those roadways include compacted engineered fill materials.		
B1-173	4.7.5	4.7-9	Table 4.7-6	The table states that the legislature did not act in 2014 in creating mandates to eliminate disposal of organic wastes to landfills. Legislation (AB1826) was in fact enacted and approved by Governor in Sept 2014 to address organic wastes (implemented by CalRecycle).		
B1-174	Greenhouse Gases	4.7-7	4.7-5	The IPCC has updated the GWP for CH4 and N2O. The updated GWP for CH4 is 28 and the updated GWP for N2O is 265.		
B1-175	4.8	4.8-2	Paragraph 3	Existing Hazardous sites referenced in proximity to the project site are incorrectly identified as being assessed for the presence of Lead. Based on SDG&E's review of the GeoTracker web site, the three sites were assessed under Department of Toxic Substances Control (DTSC) for Arsenic, DDD, DDE, DDT, and Methane, not for Lead.	The three sites were assessed for the presence of lead in soil due to historical activities (i.e., agriculture) and do not require any further environmental action.	The three sites were assessed for the presence of lead arsenic and pesticides in soil due to historical activities (i.e., agriculture) and do not require any further environmental action.
B1-176	4.8	4.8-3	Table 4.8-1	Correct Table 4.8-1 for Middle School No. 12/High School No. 14 to accurately reflect Chemical of Concern.	Lead	Lead Arsenic, DDD, DDE, DDT
B1-177	4.8	4.8-3	Table 4.8-1	Correct Table 4.8-1 for San Miguel Elementary School Site to accurately reflect Chemical of Concern.	Lead	Lead None
B1-178	4.8	4.8-3	Table 4.8-1	Correct Table 4.8-1 for Otay Ranch Village 11; S-1 School Site to accurately reflect Chemical of Concern.	Lead	Lead Arsenic, DDD, DDE, DDT
B1-179	Reg Setting	4.8-10	5	The Oil Pollution Act was not part of the CWA or its amendments. This was incorrectly stated in the PEA as well.		
B1-180	Hazardous Materials	4.8-26	4	Please update the reference to the most recent SWRQB Order throughout.	SWRCB Order 2009-0009-DWQ	SWRCB Order No. 2009-0009-DWQ 2012-0006-DWQ
B1-181	TL 6965	4.8-27		The HMBP does not apply to transportation or mobile sources, as implied in this section.		

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
					Existing Language	Revised Language
B1-182 123.	4.15.1	4.15-1	2nd paragraph	The number of natural gas meters needs to be corrected from 850,000 to 868,000.	Electricity and Natural Gas SDG&E provides gas and electric service to the City and the unincorporated areas of the County. SDG&E provides energy service to 3.4 million people through 1.4 million electric meters and 850,000 natural gas meters in San Diego County and southern Orange County, with a service territory spanning approximately 4,100 square miles (SDG&E 2013).	Electricity and Natural Gas SDG&E provides gas and electric service to the City and the unincorporated areas of the County. SDG&E provides energy service to 3.4 million people through 1.4 million electric meters and 850,000 868,000 natural gas meters in San Diego County and southern Orange County, with a service territory spanning approximately 4,100 square miles (SDG&E 2013).
B1-183 124.	Utilities & Service Systems	4.15-5	Alternating Currents	Corrections as shown.	The project is located near existing buried utility pipelines. AC can cause corrosion on buried utility pipelines located near a power line if the current density would exceed the design standards for protection of the power line.	The project is located near existing buried utility pipelines. AC can cause corrosion on buried utility pipelines located near a power line if the current density would exceed the design standards for protection of <u>AC corrosion mechanisms on</u> the power line.
B1-184 125.	Utilities & Service Systems	4.15-12	Operations and Maintenance	Clarifications as shown.	Operation and Maintenance TL 6965 would conduct 69-kV power between Miguel Substation and the proposed substation during project operation. There is the potential for induced current (refer to Section 4.8: Hazards and Hazardous Materials for definitions) between TL 6965 and the existing 4-inch and 36-inch gas pipelines and the two SDCWA water pipelines located within the adjacent utility corridor. The gas pipelines and water pipelines are located in proximity to the proposed power line between the proposed substation and SR-125. Induced current can cause corrosion on buried pipelines as a result of AC electrical current leaving the metal pipeline surface.	Operation and Maintenance TL 6965 would conduct 69-kV power between Miguel Substation and the proposed substation during project operation. There is the potential for induced current (refer to Section 4.8: Hazards and Hazardous Materials for definitions) between TL 6965 and the existing 4-inch and 36-inch gas pipelines and the two SDCWA water pipelines located within the adjacent utility corridor. The gas pipelines and water pipelines are located in proximity to the proposed power line between the proposed substation and SR-125. Induced current can cause corrosion on buried pipelines as a result of AC electrical current leaving the metal pipeline surface <u>only at a holiday (i.e. defect) in the pipeline coating.</u>

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22 June 2015

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**RE: Salt Creek Substation Project, SDG&E Hermes Copper Butterfly Host Plant
Survey Results Memo**

A habitat assessment for the Hermes Copper Butterfly (*Lycaena hermes*) was conducted across two days by Dr. David Faulkner on behalf of AECOM at the Salt Creek Substation project site. Surveys were completed to determine suitability of the proposed project footprint plus a 100-foot buffer for the species. Surveys were completed on June 12 and June 16, 2015. Dr. Faulkner surveyed the route, proposed Salt Creek Substation site, and the south end of the existing Miguel Substation for spiny redberry, *Rhamnus crocea*, the host plant for Hermes Copper butterfly (*Lycaena hermes*). Suitable habitat for Hermes Copper requires established populations of the single larval host plant, *R. crocea*, as well as adult nectar sources, especially California buckwheat, *Eriogonum fasciculatum*. On 12 June, conditions were not adequate for adult Hermes Copper activity with temperatures reaching the mid 60°F range, but were favorable on 16 June with temperatures reaching the high 70°F. Time was spent at the Salt Creek site both days, allowing for the possibility of encountering Hermes Copper if it was present. Larval host plants were found and documented along with potential adult nectar sources.

RESULTS

No adult Hermes Coppers were seen during the surveys. Larval host plants were located only near the buffer zone of the Salt Creek Substation site (well over 100 feet away from the proposed substation footprint (Figure 1). Spiny redberry was documented in four locations, three of which contained single plants (Figure 1). One of these individuals is within 100 feet of the transmission corridor. All others are over 100 feet outside of the transmission corridor. California buckwheat was abundant in this region and many plants were within 15 feet of the mature redberry. It is unlikely that Hermes Copper currently occupies this site because of the limited number and condition of the larval host plant. No other stands of *R. crocea* were found within 500+ feet of this small population.



Additionally, no *R. crocea* was recorded from the Hunte Parkway Staging Yard, the route north to the Miguel Substation, the Eastlake Parkway Staging Yard, or the existing Staging Yard.



David K. Faulkner
Entomologist



Source: AECOM, 2015. ESRI, Microsoft, 2010.

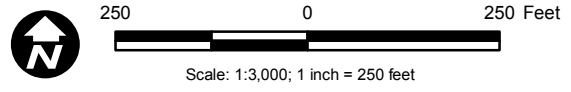


Figure 1
Rhamnus Crocea
Salt Creek

3 COMMENTS AND RESPONSES

3.2.1 Response to Letter B1: David Geier, SDG&E

- B1-1 Comment noted. Detailed responses to specific concerns about Alternative 2 and potential significant impacts of the proposed project are provided in the responses to specific comments below.
- B1-2 The CPUC recognizes that the proposed project would meet the project objectives for the reasons described in the PEA. The rationale for selecting Alternative 2: 69/12-kV Substation and Generation at Border and Larkspur Electric Facilities, as the environmentally superior alternative is described in the EIR. Refer to Chapter 6: Comparison of Alternatives.
- B1-3 Comment noted. Specific text revisions are addressed in responses to comments, where appropriate. Refer to responses B1-60 through B1-184.
- B1-4 Comment noted.
- B1-5 Comment noted. Refer to response to comment B1-2.
- B1-6 Comment noted. The EIR provides specific quantities of emissions from construction separate from operation and maintenance of the proposed project and each alternative. As stated in the EIR, the emissions from construction of Alternative 2 would be the same as construction of the proposed project substation, distribution lines, and TL 6910 loop-in. Overall, Alternative 2 would have 16 MT CO₂e less emissions during construction than the amortized emissions from construction of the proposed project because it does not involve construction of the 69-kv power line.
- The EIR also concludes that greenhouse gas emissions from operation of Alternative 2 would exceed those of the proposed project, but remain less than significant. Greenhouse gas emissions from construction and operation of the proposed project and all alternatives would be less than significant and no mitigation is required to address emission levels. Mitigation measures are applied to greenhouse gases for consistency with applicable climate change plans. Refer to Section 4.7 for a detailed analysis of the emissions from construction and operation of the proposed project and alternatives. A comparison of the proposed project and alternative emissions is provided in Chapter 6: Comparison of Alternatives, Table 6.5-1 and Section 6.3.
- B1-7 Section 4.7 of the EIR provides a detailed analysis of the operational emissions from the proposed project and alternatives. While Alternative 2 would result in greater lifetime emissions than the proposed project, the construction and operation emissions for Alternative 2 would be less than significant and no mitigation is required. Table 6.5-1 inadvertently marked the air quality impacts from Alternative 2 lower than impacts from the proposed project. The revision shown below reflects the total lifetime emissions from the proposed project and each alternative:

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Resource Area	Proposed Project	Alternative 1	Alternative 2	Alternative 3	No Project Alternative
Air Quality	<p>Ranking = 32</p> <ul style="list-style-type: none"> • Less than significant NO_x, PM₁₀ and PM_{2.5} emissions from earthwork during construction • Less than significant emissions from power line construction 	<p>Ranking = 4</p> <ul style="list-style-type: none"> • Temporary increase in emissions associated with construction of a larger substation • NO_x emissions from construction of the substation less than significant with mitigation 	<p>Ranking = 25</p> <ul style="list-style-type: none"> • Avoids air quality emissions from construction of a new power line • On-going increased operational emissions from power generation 	<p>Ranking = 53</p> <ul style="list-style-type: none"> • Temporary increase in emissions from construction of an underground power line relative to an overhead power line 	<p>Ranking = 1</p> <ul style="list-style-type: none"> • Avoids emissions from construction of a substation • Emissions from underground distribution construction less than proposed project

B1-8 The life-time air quality and greenhouse gas emissions of the proposed project and the alternatives have been compared as reflected in Chapter 6. Refer to response to comment B1-6 and B1-7, above.

B1-9 Pursuant to Appendix F of CEQA Guidelines, potential energy impacts of Alternative 2 are addressed in Section 7.5: CEQA Statutory Sections. Alternative 2 would increase energy consumption and fossil fuel use but would only require the equivalent of additional 7 hours per year of energy production and dispatch to meet the electrical needs of the area in the absence of a new power line. This is considered a *de minimis* increase in energy consumption.

B1-10 Refer to response to comment B1-9. As described above, although the proposed project would require less energy and fuel consumption to operate, the additional amount needed to operate Alternative 2 is considered *de minimis* and less than significant. The proposed project would require more fuel consumption to construct than Alternative 2.

B1-11 Refer to Chapter 6: Comparison of Alternatives and responses to comments B1-6, B1-9, and B1-10. While Alternative 2 would have greater lifetime air quality and greenhouse gas emissions, these emissions would be less than significant. Alternative 2 would reduce the significant and unavoidable noise impacts of the proposed project by avoiding construction of the power line including the use of helicopters near schools and residences along the transmission corridor. Alternative 2 would also reduce proposed project impacts that are less than significant with mitigation in the following resource areas: biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, recreation, transportation and traffic, and utilities and service systems by avoiding construction of a 5-mile long power line. Alternative 2 would

3 COMMENTS AND RESPONSES

reduce several impacts of the proposed project that are significant and unavoidable and less than significant with mitigation.

- B1-12 SDG&E's objective 2, "provide three 69-kV circuits into the proposed substation to serve load growth in the region and meet the regulatory requirements of the North American Electric Reliability Corporation (NERC), Western Electric Coordinating Council (WECC), and California Independent System Operator (CAISO)" falls under one of the basic project objectives as defined by the CPUC: "provide substation and circuit tie capacity that would provide additional reliability for existing and future system needs." NERC, WECC, and CAISO planning standards are considered in defining alternatives that provide reliability for existing and future system needs. The objective as defined by SDG&E was too narrowly defined by specifically requiring three 69-kV circuits into the proposed substation and would have unnecessarily constrained the formulation of alternatives. Refer to Appendix B, supplementary information on the Environmentally Superior Alternative, for a detailed response to the necessity of providing three 69-kV circuits into the proposed Salt Creek Substation.
- B1-13 CEQA Guidelines Section 15126.6(a) does not require an alternative to reduce impacts to a "less-than-significant level" but rather "avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Alternative 2 would substantially reduce significant and unavoidable noise impacts of the proposed project by avoiding construction of the power line near schools and residences along the transmission corridor and avoiding use of helicopters in proximity to schools and residences. Alternative 2 would avoid impacts of the power line, which are less than significant with mitigation, in the following resource areas: biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, recreation, transportation and traffic, and utilities and service systems. The CPUC recognizes that Alternative 2 would not reduce any of the significant and unavoidable impacts of the proposed project to a less-than-significant level; however, Alternative 2 would substantially lessen the significant impacts of the proposed project, as required by the CEQA Guidelines. The reduction of significant impacts is discussed in Chapter 6: Comparison of Alternatives.
- B1-14 The proposed project would have a less-than-significant visual impact from the new power line because the existing transmission infrastructure adjacent to the proposed power line within the transmission corridor would reduce the visual impacts. While the proposed project power line would have less than significant visual impacts, Alternative 2 would not construct a new power line and would therefore have no visual impact from a new power line. Alternative 2 is the environmentally superior alternative because it would substantially lessen the significant impacts summarized in response to comment B1-13 without creating any new significant impacts or increasing the severity of any significant impacts.

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- B1-15 Alternative 2 would not construct a new power line and would have no impact on recreational resources related to a new power line. Thus, Alternative 2 would reduce an impact on recreation (i.e., construction of trail detours) that was determined to be less than significant with mitigation. Alternative 2 was chosen as the environmentally superior alternative because it would substantially lessen significant impacts of the proposed project as summarized in response to comment B1-13. Table 6.3-1 and 6.5-1 in Chapter 6 of the EIR compare impacts of the proposed project, the project alternatives, and the No Project alternative as required by CEQA Guidelines Section 15126.6(d).
- B1-16 Refer to response to comment B1-13. Alternative 2 reduces significant and unavoidable noise impacts. Alternative 2 also reduces significant impacts that are less than significant after mitigation.
- B1-17 Comment noted. The rationale for not selecting Alternative 1: 230/12-kV Substation and 230-kV Loop-in as the environmentally superior alternative is provided in Chapter 6: Comparison of Alternatives. Refer to response to comments B1-18 and B1-19 for further details.
- B1-18 Alternative 1 would meet the basic project objectives as defined by the CPUC CEQA Team. The EIR acknowledges that the 230/12-kV substation operation and maintenance could require additional costs; however the alternative meets technical feasibility criteria as noted in Section 3.4.1: Alternatives.
- B1-19 The CPUC acknowledges that visual impacts from Alternative 1 would be greater than those from the proposed project. Refer to Section 4.1.6: Aesthetics and Chapter 6: Comparison of Alternatives.
- B1-20 The EIR does not require, but rather suggests, the implementation of optional measures. The optional measures are not required to reduce the proposed project's impacts to less than significant, because impacts would already be less than significant. Optional measures are recommended because they would not require substantial effort to implement and would further reduce biological and visual impacts from the proposed project. Additionally, optional measures would reduce the proposed project's contribution to cumulatively significant impacts.
- B1-21 As stated in Section 4.4: Biological Resources, Mitigation Measure Biology-6 mitigates for potential impacts to nesting golden eagle and Swainson's hawk. The analysis in the DEIR addresses impacts to foraging as well as nesting, for both species, and identifies species-appropriate mitigation in Mitigation Measure Biology-6 to ensure impacts to nesting golden eagle and/or Swainson's hawk would be less than significant. If no nests occur within 1 mile of project work areas for golden eagle or within 0.5 mile of project work areas for Swainson's hawk during nesting bird surveys, no monitoring would be required. As noted in Section 4.4, there are records of Swainson's hawk only 3,000 feet from the biological survey area

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and records of golden eagle 6 miles from the biological survey area. These buffers were defined to conform to federal and state agency requirements for protection of migratory birds and eagles.

- B1-22 Refer to response to comment B1-85, below.
- B1-23 Refer to response to comment B1-88, below.
- B1-24 Refer to response to comment B1-122, below.
- B1-25 Refer to response to comment B1-20, above.
- B1-26 CEQA requires mitigation for significant impacts to special-status species. While the NCCP and QCB HCP specify requirements that reduce impacts to some special-status species, they do not mitigate for all significant impacts to biological resources. Impact analysis in the DEIR considers the effects of compliance with the NCCP and QCB HCP terms and conditions, and whether it is reasonable to expect compliance with those requirements. The CPUC has developed mitigation measures through consideration of the NCCP and QCB HCP. The mitigation measures align with the requirements of the NCCP and QCB HCP. In certain circumstances, the mitigation measures include additional requirements to ensure that all significant impacts are mitigated.
- B1-27 CDFW and USFWS monitor how much “take” of covered species occurs as a result of SDG&E’s covered activities under SDG&E’s 1995 NCCP on an annual basis. Under the terms of the NCCP’s Implementing Agreement, take authorization is quantified as acres of habitat modification resulting from temporary or permanent activities. SDG&E is required to continuously monitor and maintain a written record of the amount and type of habitat impacted by its covered activities, and to provide this information to CDFW and USFWS in annual reports (SDG&E 1995). USFWS and CDFW have been auditing all habitat impacts authorized under the NCCP, and provided updates to SDG&E and the CPUC in May and June 2015 regarding the remaining take authorization. (Appendix C). Based on information provided by SDG&E, CDFW and USFWS determined that SDG&E will have 129.42 acres of take authorization available within the NCCP for pending and future projects. SDG&E has four projects that are proposed for construction in 2016 and 2017 (South Orange County Reliability, Sycamore—Peñasquitos [SX-PQ], Salt Creek Substation, and CNF MSUP). These four projects were estimated by SDG&E to impact 122 acres of NCCP sensitive habitats; after the estimated authorized take is deducted for these four projects, CDFW and USFWS determined that only 7.42 acres of take would remain under the NCCP (CDFW and USFWS 2015; Appendix C). SDG&E’s impact estimates for the future projects may underestimate the total impacts of the projects and mitigation requirements. For example, SDG&E’s impact estimate for SX-PQ does not include impacts from access roads; however, sensitive vegetation communities occurring within the access road areas and along the margin of the access roads

3 COMMENTS AND RESPONSES

would likely be impacted during construction of that project. SDG&E's impact estimate also did not include impacts from on-going maintenance activities conducted under the NCCP. In addition, CDFW and USFWS recommend that SDG&E proceed with a new or revised and amended NCCP. It is possible that the new or revised and amended NCCP will be implemented prior to the completion of Salt Creek construction in 2017. The current NCCP may therefore not apply to the proposed project throughout the duration of construction because there may not be adequate take authorization remaining in the NCCP, or a new or revised NCCP may be implemented during construction. Therefore, SDG&E's compliance with the NCCP cannot be relied on to mitigate significant biological resource impacts. The mitigation measures in Section 4.4 of the EIR are designed to provide mitigation similar to that in the NCCP, as well as update the mitigation to reflect current protocols, and provide additional mitigation for significant impacts that would not be mitigated, or reduced to less than significant, by compliance with the current NCCP (e.g., impacts to non-covered species).

As discussed above, and in Section 4.4: Biological Resources, if SDG&E does not, or cannot, rely on its current NCCP for take authorization for the proposed project, SDG&E would not be obligated to implement the measures in the NCCP. If SDG&E obtains take authorization through other permitting processes (e.g., pursuant to California Fish and Game Code §2081) it would be obligated to comply with those permit conditions. As discussed in this response, and in Section 4.4, SDG&E may demonstrate that compliance with take authorization (however obtained) will be equally or more effective as mitigation identified in the EIR to satisfy the mitigation performance standards or requirements of mitigation identified in the EIR. For example, where mitigation identified in the EIR is the same as requirements in the NCCP, implementation of the NCCP would satisfy the CPUC's mitigation requirement.

Where mitigation differs from requirements in the NCCP, SDG&E would be required to implement mitigation measures identified in the EIR in addition to the requirements of the NCCP. The EIR allows for SDG&E to demonstrate that compliance with the NCCP, amended NCCP, permit conditions, or other authorizations obtained by SDG&E will be equally or more effective than the mitigation identified in the EIR to mitigate impacts to biological resources.

SDG&E's APM BIO-2 requires implementation of SDG&E's NCCP. SDG&E and the NCCP Implementing Agencies may amend the NCCP during construction; therefore, APM BIO-2 may be infeasible because SDG&E would not implement the operating protocols or meet the requirements of the current NCCP if that NCCP is amended. Analysis in the EIR does not rely on APM BIO-2 (SDG&E's NCCP) to mitigate impacts because the NCCP may not apply to the project.

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- B1-28 Mitigation Measure Biology-1 has been broken up into two parts, Mitigation Measure Biology-1a and Mitigation Measure Biology-1b. The construction and operational protocols are defined in Biology-1a and compensatory mitigation requirements are defined as Biology-1b to facilitate implementation, reporting, and monitoring. The separation of Mitigation Measure Biology-1 into two measures with differing implementation, reporting, and monitoring addresses the comment. Refer to response to comment B1-76, below, for additional information.
- B1-29 Mitigation Measure Biology-1 does not conflict with the NCCP by requiring a longer timeframe for monitoring. The purpose of the monitoring is to verify that the mitigation has met the success criteria. The mitigation measure has been revised to require monitoring for at least 3 years and until success criteria are met. Should SDG&E meet the success criteria at 3 years, monitoring may cease at that time; however, the monitoring requirement shall continue until success criteria are met and may therefore extend beyond 3 years. Refer to response to comment B1-76.
- B1-30 Refer to response to comment B1-77, B1-78, and B1-79.
- B1-31 Mitigation Measure Biology-6 defines an “active nest” in biologically appropriate terms as:
...once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult bird or once nestlings or fledglings are no longer dependent on the nest.
- This language is from CDFW’s May 2013 Draft for Discussion of proposed regulations for California Fish and Game Code Sections 3503 and 3503.5. On August 14, 2015, CDFW announced its proposed regulations for 3503 and 3503.5.¹ The proposed regulation does not include a definition of “active nest”, but does define “nest” and what it means to “needlessly destroy” a nest. The definition of “active nest” in Mitigation Measure Biology-6 does not conflict with either of these definitions. No changes to the mitigation measure are required.
- B1-32 Measures to address herbicide drift are not included in APM BIO-2, which identifies measures in the NCCP that would apply to the proposed project. Mitigation Measure Biology-9 ensures special-status species would not be significantly impacted by herbicide drift. The measure is written in a manner consistent with applicable laws, regulations, and permit stipulations. The mitigation is not inconsistent with laws or other requirements.

¹ The notice and proposed rulemaking and Nest Regulations (Section 681, Title 14, CCR) are located here: <https://www.wildlife.ca.gov/Notices/Regulations/Nesting-Birds>

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B1-33 Comment noted. Refer to response to comments B1-27, B1-105, B1-106, B1-114, B1-115, and B1-116, below regarding this comment and Mitigation Measures Geology-1, and GHG-1; and APM HAZ-3 as discussed in comments B1-34 through 36.

B1-34 Refer to response to comment B1-105, below.

B1-35 Refer to response to comment B1-106, below.

B1-36 Refer to response to comment B1-114, B1-115, and B1-116, below.

B1-37 Comment noted. The CPUC has analyzed environmental impacts consistent with CEQA Guidelines (14 CCR 15000 *et seq.*).

B1-38 The comment suggests that Appendix G identifies the only impacts that a lead agency should consider. Appendix G provides suggestions as to the areas to assess. The California Governor's Office of Planning and Research states the following in the introduction to Appendix G of CEQA Guidelines (14 CCR 15000 *et seq.*):

The following is a sample form and may be tailored to satisfy individual agencies' needs and project circumstances...Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

The EIR provides substantial evidence that construction of the proposed project would have a substantial adverse effect on the recreational value of existing recreational facilities through noise and damage to trails. While this impact is not included in Appendix G of CEQA Guidelines (14 CCR 15000 *et seq.*), it was included in the assessment of impacts on recreational resources to tailor the impact discussion to the specific circumstances of the proposed project.

B1-39 The significance threshold is defined as when a project would have a substantial adverse effect on the recreational value of existing recreational facilities. The significance threshold of "substantial adverse effect" is consistent with significance thresholds used in many other CEQA significance criteria, e.g., Impact Recreation-1 where a significant effect would occur if the project were to cause substantial physical deterioration of recreation facilities. The text of Section 4.13.4 was revised as follows:

Given the specific location and design of the proposed project, impacts to one threshold not listed in Appendix G are also analyzed. Under this threshold, the proposed project would have a significant impact on recreation if it would:

c. Have a substantial adverse effect on the recreational value of an existing recreational facility

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- B1-40 The impact discussion under Impact Recreation-3 acknowledges that noise impacts would be limited to the duration of construction and that visual impacts would be limited to the time it would take landscaping to screen the substation (approximately 5 years). As discussed in Section 4.13: Recreation, these impacts, while temporary, would have a temporary substantial adverse effect on the recreational value of existing recreational facilities.
- B1-41 Comment noted. Refer to response to comments B1-38 through B1-40.
- B1-42 Comment noted. Refer to response to comments B1-43 and B1-44. The CPUC recognizes that SDG&E may reduce impacts to sensitive vegetation communities during Final Design and construction. Refer to response to comment B1-61 for a description of the method used to quantify temporary impacts at work areas.
- B1-43 Refer to response to comment B1-61. The CPUC and its experts independently evaluated the information provided by SDG&E, and made reasonable assumptions based on the CPUC's experience with other similar projects to calculate the impact area(s). The impacts in the EIR include a buffer around work areas to account for vehicle turning and multiple pieces of equipment working in an area at the same time. The impact area calculation presented in the EIR does not restrict SDG&E from reducing impacts to biological resources in the Final Design or construction of the proposed project.
- B1-44 The CPUC used aerial imagery and biological survey reports to define the habitat type on the Hunte Parkway Staging Yard site. The Hunte Parkway Staging Yard site was graded in 2005 and 2006 as part of the larger development north of Hunte Parkway. The graded area was then recolonized with non-native grassland. The Hunte Parkway Staging Yard contained non-native grassland habitat at the time of the NOP which provides suitable habitat for special-status species including burrowing owl; therefore, pre-construction surveys would be required as defined in the EIR. The EIR does not require compensatory mitigation for habitat impacts at the Hunte Parkway Staging Yard site because compensatory mitigation for the area would be conducted as part of the previously analyzed separate development project. A note is added to Table 4.4-8 explaining the status of Hunte Parkway Staging Yard, but no additional change is required in the EIR. Refer to Section 4.4.5 for the complete table and footnote. The note added to Table 4.4-8 is as follows:

Vegetation Community	Disturbance Area (acres)			
	Proposed Substation	TL 6965 Transmission Corridor	Staging Yards	Total
Permanent Impacts				
Unvegetated Channel and Concrete Brow Ditch	0.06	---	---	0.06

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Vegetation Community	Disturbance Area (acres)			
Diegan Coastal Sage Scrub	1.02	0.30	---	1.32
Native Grassland	1.59	---	---	1.59
Nonnative Grassland	5.54	1.68	---	7.22
Total Permanent Impacts	8.21	1.98	0.00	10.19
Temporary Impacts				
Unvegetated Channel and Concrete Brow Ditch	0.06	0.013	---	0.073
Diegan Coastal Sage Scrub	0.15	0.58	---	0.73
Nonnative Grassland	1.15	2.00	6.47 ²	9.62
Total Temporary Impacts	1.36	2.59	6.47	10.42

Notes:

¹ The estimated temporary and permanent disturbance area for TL 6965 includes buffers from the work areas to allow for vehicle ingress and egress. SDG&E may reduce the area of disturbance during final design and construction.

² Impacts to nonnative grasslands at the Hunte Parkway staging yard were analyzed in the certified EIR for the Otay Ranch General Development Plan Amendments/Village 11 Sectional Planning Area Plan, Conceptual Tentative Map project prepared in September 2001. Mitigation for the nonnative grassland would be carried out in accordance with the City of Chula Vista MSCP Subarea Plan prepared in February 2003. No compensatory habitat mitigation is required for proposed project temporary use of the site for staging and storage of materials.

B1-45 Refer to response to comment B1-43 and B1-44.

B1-46 Hermes copper butterfly is ranked as critically imperiled (S1) by CDFW and is a candidate for listing under the ESA. CDFW includes Hermes copper butterfly on its “Special Animals” list; the list includes species at risk regardless of legal protection status (CDFW 2015). USFWS assigned Hermes copper butterfly a listing priority number of 5 on a scale from 1 to 12, with 1 being the highest priority. Hermes copper butterfly is a moderate priority for listing; the magnitude of threats to this species are high, but nonimminent (USFWS 2014). Table 4.4-2 in Section 4.4: Biological Resources correctly lists Hermes copper butterfly as a candidate species for listing; however, Table 4.4-7 incorrectly lists Hermes copper butterfly as a CDFW Species of Special Concern. Table 4.4-7 has been revised to list Hermes copper butterfly as a federal candidate species:

Species	Status	Number of Individuals in Project and Buffer Area or Potential to Occur ¹			NCCP Covered Species?
		Proposed Substation	TL 6965 Transmission Corridor	Miguel Substation/ Staging Yards	
Invertebrates					
Hermes copper butterfly	CSEFC	Low Potential	High Potential	Low Potential	No

B1-47 The discussion of potential direct impacts to Hermes copper butterfly (Impact Bio-2 in Section 4.4) states that no individual Hermes copper butterflies were found during

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project surveys; however, suitable habitat was found within the biological survey area. Mitigation Measure Biology-4 requires surveys for Hermes copper butterfly within suitable habitat areas consisting of woody spiny redberry shrub with California buckwheat within 15 feet. Mitigation Measure Biology-4 and Mitigation Measure Biology-5 will not be deleted. However, the survey results provided by SDG&E would satisfy the requirements for pre-construction surveys if construction begins within 1 year of the survey.

- B1-48 Temporary closure of bicycle and pedestrian paths on Hunte Parkway during installation of distribution circuits and potentially during delivery of materials to the substation site would prevent cyclists and pedestrians from using the paths, which would conflict with the measures to provide bicycle and pedestrian paths included in the San Diego County Climate Action Plan and the Chula Vista CO₂ Reduction Plan. This language has been added to Impact GHG-2 in Section 4.7: Greenhouse Gas Emissions, as noted below:

The San Diego County Climate Action Plan and the Chula Vista CO₂ Reduction Plans include designating bikeways and bike lanes, improving safety of pedestrian travel, and facilitating direct pedestrian connection with transit (City of Chula Vista 2000). The project would temporarily block bike and pedestrian paths on Hunte Parkway during installation of the distribution circuits and potentially during delivery of materials to the substation site, which would prevent cyclists and pedestrians from using the paths during this time. Construction within the bike and pedestrian paths could cause bicyclists or pedestrians to enter a lane of traffic to avoid the construction area and thereby reduce the safety of these facilities. The impact to bicycle and pedestrian facilities would be a temporary significant impact. Mitigation Measure Traffic-3 requires detours for bicyclists and pedestrians to reduce impacts to bike lanes and safe pedestrian travel. Impacts would be less than significant with mitigation.

- B1-49 The Draft EIR included simulated views from the City of Chula Vista Greenbelt and Otay Ranch University Villages Project. Both of these projects are future projects that were not constructed at the time of the NOP. The City of Chula Vista has adopted an EIR for the Otay Ranch University Villages Project and the City of Chula Vista requested that the CPUC consider impacts on aesthetics from both the City of Chula Vista Greenbelt and Otay Ranch University Villages Project. Assuming that there would be no viewers in these areas and no impact on views at KOPs #14 and #15 would be misleading and uninformative because both projects are reasonably foreseeable and the impact on future viewers would be significant as presented in the EIR. The EIR is modified to include an analysis of impacts on existing conditions where there are no viewers at these KOPs in addition to the future baseline conditions described in the Draft EIR. The following has been added to Section 4.1.5 to clarify the use of a future baseline in the EIR:

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The University Village future development site (KOP 14) and the City of Chula Vista Greenbelt (KOP 15) are included as KOPs to represent a future baseline condition. Both the University Village Project (City of Chula Vista 2014) and the City of Chula Vista Greenbelt (City of Chula Vista 2003) have been approved by the City of Chula Vista and are reasonably foreseeable projects. This EIR therefore includes analysis of impacts on viewers from these future projects to provide meaningful information to the public and decision makers.

The following are added to the list of references in Section 10.5:

City of Chula Vista. 2003. Greenbelt Master Plan Map. Adopted by the Chula Vista City Council on September 16, 2003.

<http://www.chulavistaca.gov/departments/development-services/planning/chula-vista-greenbelt-master-plan>

. 2014. Otay Ranch University Villages Project Comprehensive SPA Plan Amendment: Final Environmental Impact Report. SCH No. 2013071077. Prepared November 2014.

<http://www.chulavistaca.gov/home/showdocument?id=8449>

- B1-50 Refer to response to comment B1-51.
- B1-51 The EIR considers the impact on the baseline environmental setting as well as impacts on reasonably foreseeable projects. The impact analysis is consistent with CEQA Guidelines.
- B1-52 Refer to response to comment B1-53. Project modifications must be reviewed by the CPUC to determine whether or not the modification would require subsequent CEQA review consistent with CEQA Guidelines Section 15162(a).
- B1-53 Section 9.2: Minor Project Modifications of the EIR includes the following language:
- A minor project modification should be strictly limited to minor project changes that will not trigger other permit requirements, unless the appropriate agency has approved the change; that does not increase the severity of an impact or create a new impact without appropriate agency approval; and that complies with the intent of the mitigation measure.
- The minor project modification or refinement process does not trigger separate environmental review. Rather, Section 9.2 specifies that modifications that have the potential for creating significant environmental effects would be evaluated to determine whether supplemental CEQA review is required consistent with CEQA Guidelines Section 15162(a). The term Minor Project Modification is revised to avoid confusion with the Petition for Modification process as follows: ~~Minor Project Modification~~ Refinement.
- B1-54 Comment noted.

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- B1-55 Comment noted.
- B1-56 Comment noted.
- B1-57 The benefits of the proposed project identified by SDG&E are noted. The objectives of the proposed project are defined in Chapter 2: Project Description.
- B1-58 Comment noted.
- B1-59 Comment noted.
- B1-60 Please refer to response to B1-12 regarding the objectives.
- B1-61 The surface disturbance calculations used in the EIR are based on the information provided in the PEA, GIS data provided by SDG&E, and descriptions of work area limits provided in responses to data requests.

The temporary work area estimates included in Table 2.5-1 include a buffer to account for direct impacts from vehicle access and turnarounds as well as indirect impacts from construction activities. The buffer reflects CPUC experience working on similar projects where additional space was often required to allow multiple vehicles or pieces of construction equipment to access the work area at the same time. The addition of a buffer was used to provide a conservative estimate of disturbance so that all potential impacts of the proposed project are evaluated in this EIR. The methodology for defining buffers around work areas is shown in Table 2.5-2, below.

Table 2.5-2: Buffer Areas Around Work Areas

Work Area	Buffer (feet)
<u>Work pads</u>	<u>10</u>
<u>Directly embedded poles</u>	<u>10</u>
<u>Engineered foundations steel poles (temporary)</u>	<u>37.5</u>
<u>Engineered foundation steel poles (permanent)</u>	<u>4</u>
<u>Cable pole (temporary)</u>	<u>75</u>
<u>Cable pole (permanent)</u>	<u>4</u>
<u>Overland travel (temporary)</u>	<u>6</u>

The CPUC recognizes that the actual area of disturbance may be less at individual work areas, depending on the Final Design.

- B1-62 The SDG&E comment indicates that greater quantities of cut and fill will be required beyond that stated in responses to data requests and presented in the EIR. The CPUC specifically requested clarification on the amount of cut and fill for the proposed

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project on January 28, 2015. SDG&E's response on February 20, 2015 stated, "The original estimates of 90K/138K cubic yards of cut/fill were based on preliminary engineering in the design/development stage whereas the most recent estimates are based on volumes calculated from the current plan set that has been submitted to the City of Chula Vista for permits." The estimate in the EIR is consistent with SDG&E's response from February 20, 2015, which supersedes the information in the PEA and is therefore used in the EIR.

- B1-63 The Project Description was revised to include potential Sunday construction as allowed by Section 17.24.040 of the City of Chula Vista Municipal Code. This change does not change the significance of any proposed project impacts in the EIR because the City allows for construction at these times. The text under Section 2.7.16 in Chapter 2 was revised as follows:

Standard daytime construction hours for the proposed project would be Monday through Friday, 7 AM to 7 PM, and 8 AM to 7 PM on Saturday. Should it become necessary to meet project in-service needs, construction on Sundays may be performed consistent with the City of Chula Vista Municipal Code which allows construction on Sundays between the hours of 8AM and 10PM.

- B1-64 The Project Description text under Section 2.7.6 was revised as follows:

All steel poles would require a minimum of two grounding rods and a copper ground wire connecting the steel pole to the rods.

- B1-65 The CPUC recognizes that SDG&E will need to obtain a permit and consult with Caltrans regarding the crossing of SR-125 and the appropriate measures to protect public safety. The text under Section 2.7.7 was revised as follows:

~~Temporary guard structures and mesh netting would be installed at crossings of SR-125. SDG&E, the construction contractor, and Caltrans would collaborate to determine appropriate methods to ensure safety during conductor installation over SR-125. Typical methods include short periods of stopping traffic, guard structures, and mesh netting.~~

- B1-66 The Project Description was revised to reflect the potential for the 4-inch gas pipeline to be removed prior to energization of TL 6965 and therefore the possibility that no AC features would be required for that pipeline. The text under Section 2.6.2 was revised as follows:

SDG&E anticipates the 4-inch gas pipeline would be removed within the next 2 years (i.e., 2016 and 2017). Gradient control wires and gradient control mats would be installed on the ~~existing~~ gas pipelines that would be in place after energization of the power line to reduce AC interference effects and fault conditions from TL 6965. Up to Sseven gradient control mats (ground mats) and six gradient control wires (zinc ribbon anode or equivalent) would be installed

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on the gas pipelines via solid-state decoupling devices. Ground mats would be installed at up to six test station locations and one valve location. Four gradient control wires would be installed on the 36-inch-diameter gas pipeline and two gradient control wires would be installed on the 4-inch-diameter gas pipeline if the gas pipeline is in place at the time of energization of TL 6965.

B1-67 The Draft EIR included operational emissions from Alternative 2. As described in the Draft EIR, Alternative 2 GHG and air quality emissions would result from the increased power generation of energy at Border and Larkspur Electric Generating Facilities. The annual operating emissions from Alternative 2 are quantified in the EIR on Tables 4.3-12 and Table 4.7-9, respectively. Both air quality and greenhouse gas emissions from Alternative 2 would be less than significant.

While SDG&E does not have a Power Purchase Agreement (PPA), SDG&E does have a Resource Adequacy (RA) contract with Cal Peak Border. The RA contract requires that the generation resource be made available to the CAISO for energy dispatch to meet system or local requirements. From a responsibility (or obligation) perspective, the CAISO is responsible for the operation of the SDG&E system, including the 69-kV system at and around the proposed Salt Creek Substation Project. Regardless of SDG&E not directly (via contract) having energy dispatch control over Cal Peak Border, Cal Peak Border generation will be utilized by the CAISO to manage line loading and reliability needs in the SDG&E area. The fact that there is no PPA with SDG&E does not lessen or negate the ability of the Border generation to mitigate near term (next 10 years) loading concerns associated with the Salt Creek Substation Project.

SDG&E points out that the Border area generation will reach the designed end of life by 2030. This is not in dispute; however, as discussed in Appendix B, the use of Border area generation could mitigate the need for a third line until 2030. SDG&E has applied aggressive load growth assumptions to the Salt Creek area to justify the need for a third line. SDG&E's load growth assumptions may over-estimate load growth because SDG&E's assumed load growth of 5 percent is higher than the CEC's estimate of approximately 2 percent for SDG&E territory. The forecasted load in the Otay Ranch area may not materialize as rapidly or at the magnitude that SDG&E has forecasted and therefore the third line may not be needed until 2033 (18 years from now).

B1-68 Comment noted.

B1-69 Please refer to response to comment B1-49. The City of Chula Vista has certified an EIR for the University Villages Project and an application for the University Villages Project was filed with the City of Chula Vista prior to the NOP. The analysis of impacts to the future University Villages Project was therefore included in the EIR to provide information to the public and decision makers. It would be misleading to assume that there would be no future viewers in this area because the project has

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been approved and is expected to be constructed in the near future. The impacts to the University Villages Project were considered to provide full disclosure to decision-makers and the public.

- B1-70 Comment noted. Regulation IV, Rule 68 would only apply should Alternative 2 be selected. The additional energy generation from the Border and Larkspur electric generating facilities used in Alternative 2 would have a heat rating of 50 million British Thermal units (BTUs) or more. The stationary equipment used as part of the proposed project and the construction equipment would not exceed this threshold and are not regulated under Rule 68. Bullet number 3 in Section 4.3.2 is revised:

For Alternative 2 Only – Regulation IV, Rule 68, Fuel-Burning Equipment-Oxides of nitrogen: Rule 68 regulates NOx emissions from non-vehicular, fuel-burning equipment with a maximum heat rating of 50 million British Thermal units or more.

- B1-71 The CPUC recognizes that the APMs are proposed by SDG&E. The CPUC accepts SDG&E's revisions to the APM with the exception of wetting the soil three times daily. Over-application of water could result in impacts and is therefore not appropriate. The text of APM AIR-1 is revised within Tables 2.11-1 and 4.3-5. The CPUC notes that the SDG&E's requested revision requires monitoring of wind speeds to determine when earthmoving equipment use would be suspended. The CPUC also notes that the requirement to manage visible dust emissions at the property line is included in Mitigation Measure Air-1. This revision to the APM does obviate the need for, modify, or replace Mitigation Measure Air-1. APM Air-1 is revised as follows:

APM AIR-1: Dust Control: All unpaved demolition and construction areas ~~will be wetted as needed~~ shall be wetted at least as needed during construction, and temporary dust covers shall be used to reduce fugitive dust emissions and meet San Diego Air Pollution Control District (SDAPCD) Rule 55 requirements. SDG&E or its contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling and at all times provide reasonable dust control of areas subject to windblown erosion. All ~~earthen material transported off site will~~ loads shall be secured by covering or use of at least 2 feet of freeboard to avoid carry-over. All materials transported off-site shall be either sufficiently watered or securely covered. All earth-moving or excavation activities ~~that create visible dust will~~ shall be discontinued ~~to limit~~ during periods of high winds (i.e., greater than 25 mph) to prevent excessive amounts of fugitive dust ~~from leaving the project site generation.~~

- B1-72 The CPUC is required under CEQA to mitigate for significant impacts resulting from the proposed project. The Draft EIR describes the biological resources impacts of the proposed project and describes why SDG&E's compliance with the NCCP cannot be relied on to mitigate those impacts to less than significant. SDG&E's NCCP does not

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replace the mitigation requirements in Mitigation Measures Biology-1, Biology-2, Biology-8, Biology-10, and Biology-11 for the reasons discussed in the Draft EIR. Please see responses to comments B1-26 and B1-27.

- B1-73 The mitigation and monitoring requirement under the Monitoring/Reporting Requirement column for Mitigation Measure Biology-1 in the Mitigation Monitoring and Report Plan (MMRP) has been revised to reflect training of staff prior to construction. The text of the MMRP is revised as follows.

Monitoring/Reporting Requirement

SDG&E:

Follow general behavior protocols for all field personnel.

Conduct environmental training for staff ~~at least 30 days~~ prior to ~~the start of construction~~ personnel conducting work on the project, and submit a copy of the training materials to the CPUC.

Pre-activity survey will be conducted no earlier than 30 days prior to surface disturbance.

Follow protocols for maintenance, construction of access roads, survey work, and emergency repairs.

~~SDG&E will provide compensatory mitigation for temporary and permanent impacts to vegetation communities and provide CPUC with evidence of available habitat mitigation lands for project temporary and permanent impacts to vegetation communities and a habitat enhancement plan at least 30 days prior to the start of construction.~~

~~Monitoring compensatory mitigation lands for 5 years and until success criteria are met~~

Provide the CPUC with copies of permits or other authorizations including any future amendments to the NCCP, and supporting documentation, to show that compliance with permitting conditions will be equally or more effective as mitigation for impacts to biological resources, if applicable.

CPUC:

Verify that SDG&E follows general behavior protocol for all field personnel.

Verify environmental training.

Verify that pre-activity surveys are conducted.

Verify that SDG&E follows protocols for maintenance, construction of access roads, survey work, and emergency repairs.

~~Verify evidence of available habitat mitigation lands at least 30 days prior to the start of construction.~~

~~Review and approve habitat enhancement plan at least 30 days prior to the start of construction~~

~~Verify monitoring of compensatory mitigation.~~

The CPUC will determine whether compliance with permit conditions will also satisfy the performance standards or requirements identified in mitigation measures in this EIR; SDG&E will submit adequate documentation to CPUC to verify compliance.

- B1-74 SDG&E's revisions to the APM have been added. While the CPUC has preemptive authority over local jurisdictions, it is standard practice for utilities to obtain ministerial permits from local agencies for construction and ministerial permits do not conflict with the CPUC's preemptive authority for the siting of electric utility projects under General Order 131-d. The City of Chula Vista does not have a noise

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variance. Variances for work outside of standard noise hours are ministerial permits. Noise variances do not conflict with the CPUC's preemptive authority for the siting of electric utility projects under General Order 131-d. The APM Noise-3 text has been revised as follows:

APM NOISE-3: Construction Outside of Allowed Hours	If construction activities are required outside of the permissible local construction hours, SDG&E will obtain approval from meet and confer with the City of Chula Vista and the County of San Diego prior to conducting construction outside the permitted hours.
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Additional changes were made to the Impact Noise-1 analysis to reflect the revision to APM NOISE-3 as shown below.

The increase in noise levels from construction activities occurring outside of standard daytime work hours would be either within the ambient noise levels or of very short duration (i.e., one to two hours per day for up to two weeks); ~~however, construction activities that occur outside of the City approved construction work hours could result in a significant impact if they conflict with local agency noise standards. The impact to local noise standards would be less than significant due to the short duration of activities and because the noise levels would not exceed existing night-time ambient noise levels.~~

- B1-75 APM BIO-2 lacks specificity on the requirements and methods of implementation. As discussed in the EIR, if SDG&E does not rely on compliance with the NCCP for take authorization for the proposed project, SDG&E would not be obligated to implement the measures in the NCCP. Where Mitigation Measure Biology-1 is the same as the requirement in the NCCP, SDG&E may show that it has implemented the NCCP protocols to satisfy the CPUC's mitigation requirement as described in the EIR. Where the measures differ from the NCCP requirements, SDG&E would be required to implement additional mitigation as required in the EIR.
- B1-76 Mitigation Measure Biology-1 has been broken up into two parts, Mitigation Measure Biology-1a and Mitigation Measure Biology-1b. The compensatory mitigation and habitat enhancement portion of Mitigation Measure Biology-1 has become Mitigation Measure Biology-1b and the remainder of Mitigation Measure Biology-1 is renamed Biology-1a to separate out the requirements of this measure for ease of implementation. The text of Section 4.4 has been revised to reference the revised mitigation measure numbering. The requirements of Mitigation Measure Biology-1b have been revised to better align with the NCCP requirements; however, SDG&E is required to monitor the mitigation lands for at least 3 years *and* until success criteria are met; SDG&E's mitigation obligation is not fulfilled until both requirements are met. Mitigation Measure Biology-1b is revised as follows:

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Mitigation Measure Biology-1b: Compensatory Mitigation and Habitat Enhancement Measures

SDG&E shall provide compensatory mitigation for temporary and permanent impacts to vegetation communities caused by the proposed project. SDG&E shall follow the guidelines set in Sections 7.2 and 7.4 of the NCCP dated 1995. SDG&E shall provide CPUC with evidence of available habitat mitigation lands for project temporary and permanent impacts to vegetation communities at least 30 days prior to the start of construction. If SDG&E proposes to conduct on-site habitat enhancement activities as defined by the NCCP Habitat Enhancement in lieu of preservation of habitats within a mitigation bank or withdrawal of mitigation credits from the existing SDG&E Mitigation Bank, SDG&E shall submit a habitat enhancement plan to CPUC at least 30 days prior to the start of construction for CPUC review and approval. At a minimum, the habitat enhancement plan must demonstrate the enhancement of vegetation communities impacted by the project, define the methods used to enhance the habitat, and include monitoring for at least 35 years and until success criteria are met. Success criteria for habitat enhancement, ~~will include improving degraded habitats at a minimum of a 2:1 ratio for vegetation communities impacted by the project including mitigation ratios, shall be as defined by the NCCP Enhancement Program.~~ Permanent impacts shall be mitigated at a 2:1 ratio for all impacts inside of a preserve and a 1:1 ratio for all impacts outside of a preserve.

B1-77 Mitigation Measure Biology-3 has been revised to require documentation and density mapping prior to construction. The measure is also revised to specify that treatment would occur after construction when the presence of Cal-IPC High or Moderate species could increase in comparison to baseline conditions. The revision would not reduce the effectiveness of the measure at controlling weed infestations because it would control weed cover consistent with existing conditions in the transmission corridor. The revisions to Mitigation Measure Biology-3 are as follows:

Mitigation Measure Biology-3: Precautions shall be taken to minimize the introduction and spread of invasive weeds. Weed control shall include the following:

1. Prior to construction, all work areas within SDG&E ROW shall be reviewed for the presence of weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database (<http://www.cal-ipc.org/paf/>). These plant species shall be mapped and density of occurrence within the project area determined prior to commencement of ground disturbing activities. All Cal-IPC High or Moderate species with limited occurrence within 15 feet of project impact areas shall be treated or mechanically removed prior to construction according to control methods and practices for invasive weed populations designed ~~in consultation with the~~ per California Invasive Plant Council (Cal-

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IPC) recommendations. Cal-IPC High and Moderate species that are ubiquitous within and adjacent to the project area shall be treated when the percent cover of these weed species exceeds baseline conditions in the area. Ornamental plant species that have been planted within the project area shall be excluded from all weed control efforts.

B1-78 Mitigation Measure Biology-3 has been revised as follows to remove reference to County Agriculture Commission Office and Cal-IPC consultation:

2. Weed control treatments shall include all legally permitted chemical, manual, and mechanical methods ~~applied with the authorization of the San Diego County Agriculture Commissioner.~~ The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a licensed Pest Control Advisor (PCA) and implemented by a licensed Qualified Applicator. Where manual and/or mechanical methods are used, plant debris shall be disposed of in a landfill as appropriate. Timing of weed control treatment shall be determined for each plant species ~~in consultation with the PCA, the San Diego County Agriculture Commissioner, and Cal-IPC, by the PCA~~ with the goal of controlling populations before they start producing seeds.

B1-79 Mitigation Measure Biology-3 has been revised to require that equipment arrive clean, as opposed to only requiring washing of equipment. Part 5 is revised to require monitoring and treatment until the density of weed species is at or below preconstruction conditions. Part 6 of the mitigation measure is revised to require CPUC review of an initial seed list prior to construction and approval of a final seed list at least 30 days prior to application. Mitigation Measure Biology-3 is revised as follows:

3. Construction vehicles and equipment used for ground disturbing activities shall be ~~washed-clean~~ (including wheels, undercarriages, and bumpers) before entering and again before leaving the ~~substation site project area.~~ Further cleaning shall not be required as long as the vehicles stay within project work areas for the duration of construction activities. In addition, tools used for vegetation removal activities such as chainsaws, hand clippers, and pruners shall be ~~washed-cleaned to ensure no seed or vegetative propagules are on the equipment~~ before entering and again before leaving all project work areas. All ~~washing-cleaning~~ shall take place where rinse water and the waste product is collected and disposed of in either a sanitary sewer or landfill. A written ~~daily~~-log shall be kept for all vehicle/equipment/tool washing that states the date, time, location, type of equipment washed, methods used, and staff present. The log shall include the signature of a responsible staff member. Logs shall be available to CPUC and wildlife

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agencies for inspection at any time and shall be submitted to CPUC on a monthly basis during construction.

4. During project construction, all seeds and straw materials shall be certified weed-free, and all gravel and fill material shall be certified weed-free.
5. From the time construction begins until 2 years after construction is complete, ~~identified and treated populations~~ project impact areas shall be monitored annually for the presence of weed species that were not present prior to the commencement of construction activities as well as the reestablishment of weeds identified and treated prior to construction. Treated populations that meet the treatment criteria in Item 1 above that reestablish shall be retreated on an annual basis until the density of the species is at or below its preconstruction level.
6. Only native plants and seed or ecologically appropriate, non-invasive plants and seed shall be used in proposed project landscaping. A list of all plants and seed mixes ~~proposed anticipated to be used~~ for project landscaping, erosion control, and the revegetation of temporary impact areas shall be provided to CPUC for approval review at least 30 days prior to construction. A final plant and seed mix shall be provided to the CPUC for approval once the seed and/or plant material is in the final stages of being secured. This shall occur at least 30 days prior to application/installation. Plant and seed materials brought to the project site shall be field-verified against this list by the CPUC inspector prior to planting and seed mix application.

B1-80 The optional measure is suggested by the CPUC to further reduce impacts. SDG&E is not required to implement the measure because impacts are less than significant. However, implementation of the measure would further reduce impact. The measure has been removed from the MMRP because it is not a mitigation measure.

B1-81 Thank you for providing the additional information. No changes to the mitigation measure are made. No changes are required in the EIR. Please see response to comment B1-47. As discussed above, Mitigation Measure Biology-4 requires surveys for Hermes copper butterfly within suitable habitat areas consisting of woody spiny redberry shrub with California buckwheat within 15 feet. Mitigation Measure Biology-4 will not be deleted. However, the survey results provided by SDG&E would satisfy the requirements for pre-construction surveys if construction begins within 1 year of the survey.

B1-82 Thank you for providing the additional information. CEQA requires consideration for impacts to all special-status species including federal candidate species. The information provided by SDG&E conforms to the requirements of the measure. The measure requires mitigation for impacts to suitable habitat for Hermes copper butterfly. If SDG&E avoids impacts to suitable habitat for Hermes copper butterfly

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defined as woody spiny redberry with California buckwheat within 15 feet, then no habitat compensation would be required, consistent with the measure.

B1-83 The CPUC is required under CEQA to mitigate for significant impacts resulting from the proposed project. The mitigation required in Mitigation Measure Biology-6 is warranted because there is a moderate potential for both golden eagle and Swainson's hawk to occur within the project area. There are records of Swainson's hawk 3,000 feet from the biological survey area and golden eagle 6 miles from the biological survey area. The mitigation measure covers potential impacts should these species establish a nest within the specified buffer prior to construction. If no golden eagle or Swainson's hawk nests occur within the specified buffer during pre-construction surveys, no monitoring would be required.

B1-84 Please refer to response to comment B1-31. As described above, Mitigation Measure Biology-6 defines an "active nest" in biologically appropriate terms as:

...once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult bird or once nestlings or fledglings are no longer dependent on the nest.

This language is from CDFW's May 2013 Draft for Discussion of proposed regulations for Fish and Game Code Sections 3503 and 3503.5. On August 14, 2015, CDFW announced its proposed regulations for 3503 and 3503.5.² The proposed regulation does not include a definition of "active nest", but does define "nest" and what it means to "needlessly destroy" a nest. The definition of "active nest" in Mitigation Measure Biology-6 does not conflict with either of these definitions. No changes to the mitigation measure are required.

B1-85 The CPUC acknowledges that western yellow bat is the only bat Species of Special Concern identified for the proposed project. Mitigation Measure Biology-7 was revised to be specific to western yellow bat. The measure already contains specific instructions for maternity roosts; therefore, no revisions regarding maternity roosts were made. The text of Mitigation Measure Biology-7 is revised as follows:

Mitigation Measure Biology-7: The following requirements specify protocols for surveying ~~bat~~western yellow bat habitat and avoiding impacts on western yellow bats.

Work Areas. Suitable western yellow bat habitat shall be assessed by a CPUC-approved qualified biologist in trees within a 50-foot buffer of active work areas and in structures with suitable western yellow bat habitat within a 100-foot

² The notice and proposed rulemaking and Nest Regulations (Section 681, Title 14, CCR) are located here: <https://www.wildlife.ca.gov/Notices/Regulations/Nesting-Birds>

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buffer of active work areas. If an active western yellow bat maternity roost is found in a tree or structure, the CPUC-approved qualified biologist shall define an appropriate limited or no-work exclusion area surrounding the roosting habitat based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), as well as in consideration of the habitat quality and duration of work-related disturbance in the vicinity of the maternity roost. The limited work or exclusion areas shall be approved by CPUC's independent biologist who shall respond to SDG&E's request for approval within one business day; if a response is not received, SDG&E may proceed with the implementation of the proposed limited work or exclusion area until CPUC's independent biologist can review and approve or deny the buffer reduction request.

The limited work or exclusion area shall not apply to construction-related traffic using existing roads where the use of such roads is not limited to project-specific use (i.e., county roads, highways, farm roads, or other private roads) and shall not apply if the roost(s) is/are located in a residential, commercial, or industrial area.

The boundaries of the limited or no work area shall be clearly marked by the CPUC-approved qualified biologist to ensure that no vehicles or equipment physically disturb the roost. The CPUC-approved qualified biologist shall inspect roost sites when construction is occurring at the specific work site to ensure integrity of the limited or no-work area and ensure that the size of the area is adequate based on site conditions and construction-generated noise.

Tree Pruning and Removal. Preconstruction habitat assessments shall be conducted by a CPUC-approved qualified biologist on all trees to be removed that are 10 inches or more in diameter at breast height to identify suitable western yellow bat roosting habitat, within 7 days of the tree removal date.

For trees to be removed that provide suitable western yellow bat roosting habitat features, follow-up emergence surveys and acoustic monitoring shall be conducted for 1/2 hour prior to sunset and 1 hour after sunset. If western yellow bats are not detected emerging from trees and acoustic activity indicates that no roosting bats are present, no additional measures are required.

If active western yellow bat maternity roosts are detected in vegetation to be removed, removal shall occur outside of April to September, where practicable, to avoid impacts to reproductive bats. If western yellow bats are detected emerging from trees or acoustic activity indicates that roosting bats are present, the potential presence of a maternal colony shall be assessed. If a maternal colony is found in a tree, no work shall occur within 50 feet of the tree.

~~Suitable roost trees shall be removed, to the extent practicable, outside of April to September to avoid impacts to reproductive bats.~~ If vegetation removal activities

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are conducted during the western yellow bat reproductive season the following techniques shall be implemented to passively vacate bats from roosts:

Create noise and vibration disturbance on the tree (e.g., concussive hitting with equipment and/or chainsaw cutting) for at least 15 minutes before carefully opening up potential crevices and cavities for inspection and clearance.

If bats may be in a tree hole or heavy branch cavity, attempt to expose them and allow escape. For example, if the cavity cannot be investigated by the CPUC-approved qualified biologist, then carefully cut successive sections above the cavity to open it, waiting up to 10 minutes in between each cut, and determine if it is empty or allow any bats inside to crawl or fly out.

Reporting. All western yellow bat maternity roosts in trees shall be documented and reported through the MMCRP.

- B1-86 Refer to response to comment B1-85, above.
- B1-87 Refer to response to comment B1-85, above.
- B1-88 Although no San Diego desert woodrat individuals or houses were found during previous biological surveys, it is possible woodrat houses could be constructed in the project area or vicinity prior to proposed project construction. Impacts to San Diego desert woodrat are possible due to the presence of suitable habitat. As discussed in Section 4.4.5 (Impact Bio-5), impacts would be significant if a large number of individuals, or a population were killed or injured; therefore, Mitigation Measure Biology-8 is warranted in order to define procedures to avoid mortality or injury of large numbers, or populations of San Diego desert woodrat if woodrat houses are found during preconstruction surveys. The measure will remain in place; no changes are required.
- B1-89 The use of SDG&E's standard procedures and protocols related to the use of herbicides were not specified in APMs for the proposed project; therefore, Mitigation Measure Biology-9 was identified to mitigate impacts from herbicide use. As the CEQA lead agency, the CPUC exercises its independent judgment in analyzing impacts and identifying mitigation to ensure impacts would be less than significant. No changes are required.
- B1-90 Mitigation Measure Biology-11 was designed to ensure success of on-site restoration and mitigation activities. It is ecologically preferable to restore habitat at the area of impact because that habitat directly benefits the species being impacted by the proposed project. In areas of temporary impact, it is feasible to restore habitat through revegetation; therefore Mitigation Measure Biology-11 requires restoration and defines specific success criteria that SDG&E must meet for temporary habitat impacts.
- The CPUC acknowledges that SDG&E has already mitigated for impacts from Salt Creek Substation parcel through purchase of 11.0959 acres in the Otoy Ranch

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Preserve, as discussed in the Section 4.4 of the EIR. The CPUC made the following revisions to Mitigation Measure Biology-11 to clarify that the temporary restoration is required in areas of temporary impact within the transmission corridor and not within the substation site:

Mitigation Measure Biology-11: The Applicant shall prepare and implement a Restoration and Revegetation Plan for restoration and revegetation of temporarily disturbed areas along TL 6965 within SDG&E's ROW between Miguel Substation and the proposed Salt Creek Substation. The Restoration and Revegetation Plan shall apply to areas temporarily disturbed during construction of the proposed project not subject to ongoing disturbance by other SDG&E maintenance activities or by other entities (i.e., utility providers such as the City of Chula Vista) out of SDG&E's control. The Restoration and Revegetation Plan shall be prepared by a biologist with expertise in southern California ecosystems and native plant revegetation techniques.

B1-91 Refer to response to comment B1-44. The estimated vegetation community impacts for TL 6965 include buffers around the work areas as defined in response to comment B1-61. These work areas were included to provide flexibility in final design and construction of the project. A note has been added to Table 4.4-8 that states the area of disturbance may be reduced during final design and construction of the proposed project. No other change is required in the EIR.

The Hunte Parkway Staging Yard contained non-native grassland habitat at the time of the NOP. Non-native grassland provides suitable habitat for special-status species including burrowing owl; therefore, pre-construction surveys would be required as defined in the EIR. The EIR does not require compensatory mitigation for habitat impacts at the Hunte Parkway Staging Yard site because compensatory mitigation for the area would be conducted as part of the previously analyzed Otay Ranch General Development Plan Amendments/Village 11. A note has been added to Table 4.4-8 explaining the status of Hunte Parkway Staging Yard, but no additional change is required. Refer to Section 4.4.5 for the complete table and footnote.

B1-92 The CPUC made the following revisions in Section 4.4.2 regarding SDG&E's Low-Effect HCP for QCB to address the relationship between the QCB HCP and the NCCP:

~~The~~ SDG&E's Low-Effect HCP for QCB, which authorizes incidental take of federally endangered QCB, was approved in May 2007. The HCP authorizes loss of 33 acres of QCB habitat and requires SDG&E to implement general and QCB-specific operational protocols to avoid or minimize take of QCB. SDG&E's HCP for QCB ~~relies on the 1995 Subregional NCCP and states that should the 1995 Subregional NCCP become ineffective (i.e., is no longer being implemented), the protocols therein will still be implemented~~ functions as a stand-alone document with a stand-alone Implementing Agreement and QCB Mitigation Fund, which functions independent of the NCCP. SDG&E

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will implement the protocols in the HCP, along with the protocols listed in Appendix A of the QCB HCP whenever a covered activity takes place in QCB habitat.

- B1-93 Refer to response to comment B1-46.
- B1-94 The project, as proposed by SDG&E, includes the use of access roads that cross drainages. It is recognized that driving over an access road does not constitute a fill of waters of the U.S. or state; however, the proposed project includes potential use of temporary bridge crossings, which could constitute a fill to waters of the U.S. or state, thereby requiring permits. The proposed project could also result in impacts to riparian or wetland habitat as a result of rutting from vehicles driving over the drainage immediately following rain events. The description of impacts is consistent with the potential impacts of the proposed project. Mitigation Measure Hydro-1 is revised to clarify the method for installing the temporary bridge and monitoring of bridge installation. Refer to response to comment B1-122.
- B1-95 The text in Section 4.5 was revised to specify two groups of cultural resources:
For analysis purposes, cultural resources may be categorized into ~~three-two~~ groups: archaeological resources, and historical resources, ~~and contemporary Native American resources~~.
- B1-96 Section 4.5.2 described site CA-SDI-4897 within the discussion of resources found at Miguel Substation: "Lithic material associated with site CA-SDI-4897 was observed during the SDG&E pedestrian field survey effort (AECOM 2012a; AECOM 2012b; and AECOM 2013)." This sentence has been moved under Temporary Work Areas to clarify the general location of the resource.
- B1-97 A sentence was added to Section 4.5.2 to acknowledge that a Native American monitor was present during testing of two sites:
Based on the information presented by Dr. Hector regarding past surveys conducted in the area and on the brief site visit, it was determined that no Native American monitor was required during the pedestrian survey effort. While no Native American monitor was present during the majority of pedestrian surveys, a monitor was present during testing of sites CA-SDI-7191 and CA-SDI-12909 (AECOM 2014b) in 2014.
- B1-98 The sentence was removed from APM CUL-7: Discovery of Human Remains:
The Medical Examiner has two (2) working days to examine the remains after being notified by SDG&E. ~~Under some circumstances, a determination may be made without direct input from the Medical Examiner.~~ When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the Native American Heritage Commission (NAHC).

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B1-99 The CPUC added the following discussion of CA-SDI-4897 to the discussion of impacts at staging yards in Section 4.5 under Impact Cultural-1:

One CRHR-eligible resource, CA-SDI-4897, was found within a proposed staging yard. This staging yard is a previously constructed area consisting of a flat graded area covered in a layer of gravel. Isolated finds were located adjacent to staging yards. None of these resources were determined to be eligible for listing in the CRHR, and none of these resources are considered significant under CEQA. Additionally, no ground-disturbing activities would occur at the staging yards because material could be staged and stored on the site without any modifications to the yards. Therefore, the proposed project would not damage CA-SDI-4897 or other isolated finds. No impact to archaeological resources would occur as a result of using the staging yards.

B1-100 The original buffer size was an editorial mistake and has been revised consistent with standard buffers for cultural resources. The CPUC agrees that a 50-foot (15-meter) no-construction buffer is a generally accepted buffer for cultural resources. The CPUC revised Mitigation Measure Cultural-1 to prescribe a 50-foot (15-meter) no-construction buffer if a resource is found that meets the criteria for either a historical or unique archaeological resource, or both. Mitigation Measure Cultural Resources-1 is revised as follows:

Mitigation Measure Cultural Resources-1: If previously undiscovered resources are identified during construction, the CPUC-approved cultural resource specialist/archaeologist shall evaluate the resource and determine whether it is (1) eligible for the CRHR (and thus a historic resource for purposes of CEQA); or (2) a unique archaeological resource as defined by CEQA. If the resource is determined to be neither a unique archaeological nor a historical resource, work may commence in the area. If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within ~~165~~ 50 feet (~~50 15~~ meters) of the area of the find, and the cultural resources specialist/archaeologist shall consult with CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b). Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts to cultural resources and shall be required to mitigate impacts to previously undiscovered resources. Other methods of mitigation, described below, shall only be used if the CPUC-approved cultural resource specialist/ archaeologist determines the method would provide superior mitigation of the impacts to the resource. The alternative methods of mitigation may include data recovery and documentation of the information contained in the site to answer questions about local prehistory (see Mitigation Measures Cultural Resources-3 and Cultural Resources-4). The methods and results of evaluation or data recovery work at an archaeological find shall be documented in a professional-level technical report

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to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of treatment, as approved by CPUC.

- B1-101 The CPUC made the following revisions to Mitigation Measure Cultural Resources-2 to compromise with SDG&E's request:

The HPTP shall include provisions for analysis of data in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by CPUC, and dissemination of reports to appropriate local and state repositories, ~~libraries,~~ ~~and interested professionals.~~

- B1-102 The original buffer size was an editorial mistake and has been revised consistent with standard buffers for paleontological resources. The CPUC agrees that a 50-foot (15-meter) no-construction buffer is consistent with general practice and is a reasonable buffer for paleontological resources. The CPUC revised Mitigation Measure Paleontology-1 to prescribe a 50-foot (15-meter) no-construction buffer if a paleontological resource is uncovered. Mitigation Measure Paleontology-1 is revised as follows:

Mitigation Measure Paleontology-1: In the event that a paleontological resource is uncovered during project implementation, all ground-disturbing work within ~~165~~ 50 feet (~~50~~ 15 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, a qualified, CPUC-approved qualified paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, part V. The determination and associated plan for protection of the resource shall be provided to CPUC for review and approval. If the resource is determined not to be unique, work may commence in the area. If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with SDG&E and CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts to paleontological resources and shall be required unless there are other equally effective methods. Other methods may be used but must ensure that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. All recovered fossils shall be curated at an accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines (SVP) standards; typically the Natural History Museum of Los Angeles County

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and UC Berkeley accept paleontological collections at no cost to the donor (SVP 2010). Work may commence upon completion of treatment, as approved by CPUC.

B1-103 Refer to response to comment B1-100.

B1-104 Refer to response to comment B1-102.

B1-105 Mitigation Measure Geology-1 does not define mitigation for inactive areas as defined in SWRCB Order 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ; rather, the measure defines mitigation for areas that will not be subject to any additional surface disturbance. Mitigation Measure Geology-1 is revised as follows for clarity:

Mitigation Measure Geology-1: For areas that will not be subject to additional disturbance, once temporary surface disturbances are complete, permanent stabilization BMPs to control soil erosion will be used in areas that will not be subject to any additional disturbance immediately after temporary BMPs have been removed and within 7 days following final earthwork in the area. Permanent stabilization shall be stabilized within 7 days using permanent stabilization BMPs to control soil erosion BMPs may include hydroseeding, planting, and minor regrading. An SDG&E Reclamation Specialist shall inspect and monitor BMPs following installation in areas where revegetation has been performed until the minimum vegetative cover specified in the Revegetation Plan is established (see Mitigation Measure Biology-11).

B1-106 The mitigation measure has been revised to include a reference to AB 1826 and define “organic waste”. The text of Mitigation Measure GHG-1 has been revised as follows:

Mitigation Measure GHG-1: In accordance with requirements in Assembly Bill 1826, SDG&E shall dispose of organic matter waste (defined in PRC Section 42649.8(c) as food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) removed on and after April 1, 2016 by means other than transporting to a landfill if the amount of organic waste meets or exceeds 8 cubic yards per week. On and after January 1, 2017, SDG&E shall dispose of organic waste by means other than transporting to a landfill if the amount of organic waste meets or exceeds 4 cubic yards per week. Options for non-landfill disposal may include composting on previously disturbed SDG&E land, self-hauling organic waste for recycling, or participating in a greenwaste recycling program in accordance with subdivision (b) of AB 1826. SDG&E shall notify the CPUC of the disposal method at least 30 days prior to construction.

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B1-107 Closure of bike lanes would conflict with the County and City GHG reduction plans for the reasons discussed in Section 4.7.5. The analysis in the EIR concludes that impacts to the climate action plans would be less than significant with Mitigation Measure Traffic-3. The analysis in the EIR is consistent with SDG&E's comment. No changes are required in the document.

B1-108 The CPUC made the following revisions to the definition of conductive interference in Section 4.8.1, in response to SDG&E's request:

Conductive Interference. Conductive interference occurs when electric currents are discharged into the ground through the power line structure during fault conditions ~~on and affect~~ a nearby pipeline. Unlike inductive interference, conductive interference only acts on the portion of the pipeline near where the current is being discharged into the ground. Conductive interference not only affects pipelines that are parallel to the power line but can also affect pipelines that cross the power line; however, effects on pipelines that cross a power line are smaller than effects on a parallel pipeline because only a short section of the pipe is close to the location of electrical discharge. Conductive interference can result in similar hazardous effects to those resulting from inductive interference.

B1-109 The proposed revisions were incorporated into Section 4.8: Hazards and Hazardous Materials under Impact Hazards-1 as follows:

AC interference effects, as discussed under Impact Hazards-2, can include accelerated pipeline corrosion, which in turn could result in loss of pipeline integrity and release of hazardous materials (i.e., natural gas) from adjacent buried gas pipelines. The AC design features proposed by SDG&E for the 4-inch and 36-inch gas pipelines would reduce the ~~voltage current~~ densities on these pipelines. Voltage-Current densities would be less than the design criteria for all pipelines in the corridor with use of the proposed AC design features. The power line would not cause corrosion of the adjacent buried gas pipelines with SDG&E's proposed design features. Impacts would be less than significant, and no mitigation is required.

B1-110 The CPUC made the following revisions to APM HAZ-1 to clarify that the SPCC Plan applies to the Salt Creek Substation site and storage of mineral oil and a Hazardous Substance Management and Emergency Response Plan would be prepared for storage and transport of smaller volumes of hazardous materials:

APM HAZ-1: Spill Prevention, Control, and Countermeasure Plan and Hazardous Substance Management and Emergency Response Plan: A Spill Prevention, Control, and Countermeasure (SPCC) Plan will be prepared prior to project construction. ~~and that addresses response procedures in the event of any release or spill of hazardous materials during construction. An SPCC Plan is required for the transformers at the proposed Salt Creek Substation~~

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because the transformers would contain more than 1,320 gallons of mineral oil. The SPCC Plan will establish procedures, methods, equipment requirements, and worker training to prevent oil spills or leaks from reaching waterways and leaving the site navigable waterways.

A Hazardous Substance Management and Emergency Response (HSMER) Plan will be prepared prior to project construction that addresses response procedures in the event of any release or spill of hazardous materials during construction. The HSMER Plan will establish procedures, methods, equipment requirements, and worker training to prevent spills or leaks from reaching waterways and leaving the site.

Revisions were also made in Section 4.8: Hazards and Hazardous Materials and Section 4.9: Hydrology and Water Quality to reflect changes to APM HAZ-1. These revisions include changes to the description of APM HAZ-1 (i.e., adding the “HSMER Plan”) as well as a change to the discussion of operation and maintenance impacts under Impact Hazards-1 and Impact Hazards-3. The change to the mitigation measure does not affect the impact conclusion to Impacts Hazards-1 and Hazards-3 as the APM is revised to address small and large scale use of hazardous materials to prevent spills and leaks from reaching waterways and leaving the site. The modification is consistent with the approach that was described in the EIR for management and control of hazardous materials and only changes the name of the plan that would apply to the hazardous material spill. Therefore, as described fully under Impact Hazards-1 and Impact Hazards-3, the use of hazardous materials would not pose a significant hazard to the public, environment, or schools and the impacts would remain less than significant with mitigation.

- B1-111 Mitigation Measure Hazards-2 is revised as follows to reflect the ability for water tanks to move around to active work sites and to reflect that SDG&E has a designated Fire Marshall:

Mitigation Measure Hazards-2. SDG&E and/or its contractors shall have water tanks and/or water trucks ~~sited~~/available at active project sites for fire protection during project construction. All construction vehicles shall have fire suppression equipment. Construction personnel shall be required to park vehicles away from dry vegetation. Prior to construction, ~~SDG&E and its contractors~~ SDG&E's Fire Marshal/Coordinator shall contact and coordinate with CalFire and applicable local fire departments (i.e., City of Chula Vista and San Diego County) to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks if water trucks are not used. SDG&E shall submit verification of its consultation with CalFire and the local fire departments to CPUC.

- B1-112 The monitoring/reporting requirements specified for Mitigation Measure Hazards-2 in the MMRP is revised consistent with the changes to Mitigation Measure

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Hazards-2 in response to comment B1-111. Consistent with the mitigation measure, the water trucks must be available at active project sites. The text of the MMRP is revised as follows:

SDG&E:

Have water tanks and/or water trucks ~~on-site~~ available at active project sites and require construction vehicles to have fire suppression equipment.

Park vehicles away from dry vegetation.

Consult with CalFire and local fire departments to determine appropriate amount of fire equipment to carry and locations for water tanks, if necessary.

CPUC:

Verify water tanks and/or water trucks are ~~present on-site~~ available at active project sites.

Verify vehicles are parked away from dry vegetation.

Review consultation with CalFire and local fire departments.

- B1-113 The effectiveness criteria specified for Mitigation Measure Hazards-2 in the MMRP are revised consistent with the changes to Mitigation Measure Hazards-2. The text is revised as follows:

Water trucks are ~~on-site~~ available at active project sites.

- B1-114 APM HAZ-3 was defined by SDG&E in its PEA and the measure was not modified in the EIR. SDG&E's proposed revisions to the APM are unacceptable because they do not restrict activities during high or severe fire threat and defer mitigation to the Fire Coordinator/Fire Specialist to define in order to reduce risk. The APM therefore cannot be revised as suggested.

- B1-115 APM HAZ-3 was not revised for the reasons stated in B1-114. The MMRP monitoring requirement was revised to reflect that SDG&E's fire specialist would be onsite periodically. The text is revised as follows:

Verify ~~meteorologist and~~ wildland fire specialists are present periodically during construction.

- B1-116 The MMRP is revised to reflect the intent that a meteorologist or fire prevention specialist be available for consultation. The text is revised as follows:

Meteorologists and wildland fire specialists are ~~present~~ available for consultation during construction.

- B1-117 Refer to response to comment B1-110.

- B1-118 The use of recycled water was described in the EIR, Chapter 2: Project Description. Additional analysis is added to Impact Hydrology-1 to describe why the use of recycled water for irrigation of the substation site would not violate waste discharge requirements. The following text is added under Impact Hydro-1:

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Recycled water would be provided by Otay Water District if recycled water is available during the construction period. SDG&E would use the San Diego Regional Water Quality Control Board (RWQCB) waiver number 2 for low-threat discharges to land. Existing recycled water delivery (purple pipe) is located in the vicinity of the planned Salt Creek substation on Hunte Parkway. SDG&E would work with Otay Water District to establish a secure meter for recycled water supply during project construction. In addition, SDG&E will work with Otay Water District to supply the substation with firefighting and landscape irrigation water through purple pipe. The existing SDG&E Miguel Substation is currently supplied with recycled water from Otay Water District for firefighting. Recycled water at the Miguel Substation would be used for construction water as well. All project application areas are permitted under the Ralph W. Chapman Water Recycling Facility Waste Discharge Requirements (WDR's).

Water used for construction of the project including potable and/or recycled water would be discharged to land in a manner consistent with applicable Waste Discharge Requirements (WDRs) issued by the RWQCB. In addition, consistent with the RWQCB Waiver Number 2, recycled water would not be discharged to Waters of the U.S., Waters of the State or any part of the Municipal Separate Storm Sewer System (MS4). Impacts from violation of waste discharge requirements would be less than significant; no mitigation is required.

- B1-119 There are no hazardous materials spills on or in the proximity of the project site. Mitigation Measure Hydro-2 is revised to address the potential for the highly unlikely event that groundwater encountered during construction is not clean, clear, or odor free (i.e., contaminated groundwater). This modification is consistent with state and federal laws regarding disposal of the contaminated groundwater and disposal at an authorized facility would not result in other impacts because (i) the volume of water that may be encountered is very small and (ii) there are facilities in the vicinity of the proposed project that could treat the water. The text is revised as follows:

Mitigation Measure Hydro-2: Groundwater extracted during construction dewatering shall not be discharged to surface waters or storm drains. If dewatering is necessary, the water would either be directed to relatively flat upland areas for evaporation and infiltration back to the water table, used for dust control, used to irrigate upland areas, or used as makeup for a construction process (e.g., concrete production). If extracted groundwater is not clean, clear, and odor-free, it shall be disposed of at an appropriate designated facility.

- B1-120 The description of construction within the existing brow ditch system on the substation site under Impact Hydro-3 is revised as follows:

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Construction would ~~retain the existing brow ditches present on site~~ remove and replace portions of the existing brow ditch along the sewer access road where the road would be widened for substation access. The rebuilt portions of the brow ditch would differ from the existing brow ditch by slight elevation and/or horizontal variations. The resultant brow ditch would have the same functionality as the existing brow ditch. The water would flow the same direction towards the discharge dissipater, ultimately leading to Salt Creek.

B1-121 Refer to response to comment B1-62 regarding the quantities of cut and fill used in the EIR.

The analysis in the EIR conservatively estimated the impervious area at the substation site by assuming the area within the walled substation perimeter and extensions to paved roads would be impervious. Mitigation Measure Hydro-3 requires that SDG&E design the hydromodification basin in compliance with the City of Chula Vista Development Stormwater Manual. There is no reason to revise the analysis or mitigation measure because the design requirements do not change even if the area of impervious surface decreases from the maximum provided in the EIR. No change is required.

B1-122 Mitigation Measure Hydro-1 is revised to clarify the timing for avoidance of vehicle travel across drainage crossings and the method for installation of temporary bridges. Mitigation Measure Hydro-1 is revised as follows:

Mitigation Measure Hydro-1: Overland crossings of drainages with vehicles and heavy equipment shall be conducted when the drainage is dry, as determined by the aquatic resource monitor. After each rain event, drainage crossings shall be evaluated for surface flows and ponding by the aquatic resource monitor to determine if a dry-out period (i.e., avoidance of the crossing) is required to avoid impacts to the drainage. during the dry season (June 1 to October 15) or a temporary bridge shall be installed across the drainage ~~If it becomes necessary to place a temporary bridge over a jurisdictional drainage during construction, the bridge should be placed over the drainage spanning the channel from bank to bank and avoiding the Ordinary High Water Mark (OHWM) to the extent feasible. An aquatic resource monitor shall be present to provide guidance to the work crew during placement and removal of the bridge to avoid substantial impacts to the drainage.~~ SDG&E shall consult with USACE, SDRWQCB, and CDFW and obtain any required permits or approvals prior to constructing a temporary bridge over any state or federally jurisdictional drainage. ~~Waters of the U.S. and State shall be avoided during installation of the temporary bridge.~~ SDG&E shall implement restoration and/or compensatory mitigation for temporary and permanent impacts to federally jurisdictional drainages

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associated with temporary bridge construction and use, if impacts to waters cannot be avoided.

B1-123 The elevation of the substation pad and elevation difference between the substation pad and Hunte Parkway are revised in Section 4.1: Aesthetics, Section 4.10: Land Use, and Section 4.11: Noise, to reflect a substation pad elevation of 485 to 492 feet. The difference between the elevation of the substation pad and Hunte Parkway is revised from the previously stated elevation to 47 feet. The revision in elevation would not change the calculated noise levels at sensitive receptors because the distance to sensitive receptors was conservatively calculated using Euclidian distance and did not account for elevation. The topographical separation would increase the distance to the nearest receptors and thereby decrease the noise level at receptors below the noise level estimates in the EIR.

B1-124 The helicopter flight path for installation of the TL 6965 line passes within 300 feet of a school. Installation of the power line in proximity to a school could generate noise levels that would temporarily disrupt class. Disrupting classroom instruction is a significant impact. Because the power line installation will last less than one week, SDG&E could feasibly install the line during a period when school is not in session and could thereby avoid the significant impact from disturbing classroom instruction. Therefore, the mitigation measure is not changed.

SDG&E's comment and suggested revision to the mitigation measure describes the potential to use helicopters to install power poles in the vicinity of schools. This activity was not contemplated in the EIR because the Project Description and SDG&E's responses to data requests have stated that helicopter use would be limited to stringing of the power line and helicopters would be used for 4 days during construction. Additional use of helicopters was not evaluated in the EIR and would likely require subsequent CEQA analysis should SDG&E propose the use of helicopters for installation of power poles in the future due to the safety risks associated with transporting poles in the transmission corridor where the power line is located within 16 feet of existing structures.

B1-125 Refer to response to comment B1-74.

B1-126 The discussion of construction impacts on Public Services discussion under Impact Public Services-1 was revised to reflect the reduced duration of closure noted (5 to 7 minutes). This revision does not raise new issues about significant effects on the environment.

Construction of the project would not affect response times of emergency vehicles. The project would require temporary lane closures during power line stringing and construction of the underground distribution circuits. Closure of SR-125 could be closed for a few hours would be limited to short durations (e.g., 5 to 7 minute intervals) during non-peak hours, as stipulated by Caltrans and the

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California Highway Patrol, during power line stringing. Potential closure of SR-125 would be temporary; however the closure could potentially result in delays to emergency vehicle response times. SR-125 closure would be temporary, ~~(approximately three hours or less on a single day)~~, and the impact on emergency response times would not cause the need for additional fire prevention services. Impacts from SR-125 closure would be less than significant.

- B1-127 The CPUC recognizes that transportation infrastructure, such as the sewer access road and the utility access road, are used as unofficial recreational trails and considers these unofficial trails to be recreational facilities because they support recreational activities in the area. Because of the recreational activity in these areas, unofficial trails are required to be included in the Pre-Project Trail Condition Report and Post-Project Trail Condition Report, as stated in Mitigation Measure Recreation-1. Damage to access roads is mitigated by Mitigation Measure Traffic-3, which requires repair of roads damaged by construction equipment. No change is required.
- B1-128 Impacts on access roads that are being used for recreational purposes would be a significant impact to recreation because the construction equipment could substantially damage the road and affect the recreational use. Mitigation Measures Recreation-1 and Traffic-3 are required to mitigate impacts to access roads used as unofficial trails.
- B1-129 Refer to response to comment B1-38 regarding significance criteria. The substation site borders on open space areas that are used for passive recreational activities, including bird watching, horseback riding, hiking, and mountain biking. These types of recreational users are sensitive to noise and aesthetic changes due to the low noise levels in the area and the focus on the environment associated with the recreational activity.

Mitigation Measure Noise-2 is revised to require noise barriers for construction within 300 feet of equipment, as follows:

- Install temporary sound walls or acoustic blankets to shield adjacent residences from stationary equipment where residences are located within ~~200~~ 300 feet of the equipment. The sound walls or acoustic blankets shall have a height of no less than 3 feet higher than noise-generating piece(s) or parts of equipment, a Sound Transmission Class of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts along the face or at the base of the barrier.

- B1-130 Tables 4.14-7 reflected information received in the October 18, 2013 data response. The number of total construction trips for supply trucks referenced in Section 4.14: Transportation and Traffic has been revised to include the additional trips, modified from 108 to 120 trips. The increase in the maximum number of haul truck trips

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would not increase the daily traffic volume to a significant level because the increase trips would be minimal in relation to the existing volume and capacity of the road, which operates at LOS A. The increase would not change the significance of any impact. Table 4.14-7 and 4.14-8 as well as appropriate references in the text have been revised to reflect the additional 12 trips.

- B1-131 The AC interference study states that both the European Standard CEN/TS 15280 guidelines for AC corrosion as well as a design limit specific to the pipelines that would be affected by the proposed project. The text under the Alternating Currents heading in Section 4.15.5 was revised to state the following:

European Standard CEN/TS 15280 provides guidelines for evaluating the likelihood of corrosion from AC density: a pipeline is considered protected from AC corrosion if the root mean square (RMS) AC density is lower than 30 amperes per square meter (A/m²). Pipelines are considered protected from AC corrosion if the root mean square (RMS) AC density is lower than In the AC electrical interference study, the pipelines within the SDG&E ROW were considered to have a design limit of 20 A/m² 20 amperes per square meter (A/m²) (ARK 2014a). For the purposes of this evaluation, a conservative design limit of 20 A/m² is used as the threshold of significance for effects of AC corrosion on existing pipelines.

- B1-132 Refer to response to comment B1-131. The threshold of significance will remain at 20 A/m².
- B1-133 The notification timeframe for disruption outages in Mitigation Measure Utilities-1 are modified to reflect the challenge in forecasting the actual service disruptions and still require sufficient notice to residential and commercial customers to plan around the service disruption. The reduction in notification from 30 calendar days to 10 calendar days for residential and commercial outages would not affect the finding for Impact Utilities-9 of a less than significant impact with mitigation. Mitigation Measure Utilities-1 is revised as follows:
- Mitigation Measure Utilities-2:** Prior to construction in which a utility distribution service interruption is known to be unavoidable, SDG&E shall notify members of the public affected by the planned outage at least ~~30~~ 10 calendar days prior to the impending interruption for residential outages and commercial outages. Copies of the notices and dates shall be provided to the CPUC at the time the notices are distributed to the public. In the event of an unforeseen utility service disruption, SDG&E shall immediately notify the CPUC and affected utility company/companies to determine appropriate actions.
- B1-134 Mitigation Measure Utilities-3 is revised to reflect that the access road in the utility corridor is owned by the City of Chula Vista as opposed to SDCWA. The mitigation is also revised to reflect that SDG&E shall maintain access to the buried sewer lines throughout construction because it may be feasible to provide access via existing

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access roads as opposed to constructing a new temporary access. Mitigation Measure Utilities-3 is revised as follows:

Mitigation Measure Utilities-3: SDG&E shall acquire easements for access roads ~~owned by~~ from the SDCWA and the City of Chula Vista prior to use of these roads, as needed. SDG&E shall ~~construct a secondary access road to the City of Chula Vista sewer access road and~~ maintain City of Chula Vista access to buried sewer lines throughout the duration of construction.

- B1-135 Section 6.3.1 provides a summary of significant impacts (both significant and unavoidable and less than significant with mitigation) that would be reduced with Alternative 1. All of the impacts that SDG&E requests to strike would in fact be reduced under Alternative 1 because a new power line would not be constructed and all impacts associated with the power line would therefore be avoided, including the impacts listed in Section 6.3.1. No change is required.
- B1-136 Section 6.3.1 provides a summary of significant impacts (both significant and unavoidable and less than significant with mitigation) that would be reduced with Alternative 3. The impacts that SDG&E requests to strike would be eliminated or reduced under Alternative 3 because under Alternative 3 a power line would be constructed within previously disturbed City roadways as opposed to overhead within the transmission corridor. Therefore, the suggested changes are not incorporated in the EIR.
- B1-137 Refer to response to comment B1-7.
- B1-138 The sentence in Chapter 6, Section 6.5.2 is modified as follows to reflect that the reduction in temporary and periodic increase in noise level under Alternative 2 is associated with the power line, specifically:
- Alternative 2 would avoid significant and unavoidable impacts from the substantial temporary and periodic increase in ambient noise levels along the power line corridor associated with construction of the power line.
- B1-139 Refer to response to comment B1-53.
- B1-140 The language referenced in SDG&E's comment does not create duplicative or unnecessary reporting. The language does not specify the means of reporting on SDG&E's compliance with the measures and documenting that compliance with the permit conditions meets the requirements in the measure. The MMCRP reporting may be sufficient, but the CPUC retains the ability to request separate reporting if additional information is needed to verify compliance with all mitigation and permit requirements. No change is required.
- B1-141 Mitigation Measure Noise-1 is revised to define the locations for posting of notices and specify that a liaison would be provided to respond to noise complaints during construction and through energization (when noise levels would exceed thresholds).

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The revisions regarding locations for posting notices would not change the noticing required for sensitive receptors. Consequently, the effectiveness of the mitigation measure would not decrease. Mitigation Measure Noise-1 is revised as follows:

Mitigation Measure Noise-1: SDG&E shall provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging yards, helicopter fly yards, and access roads at least one week prior to construction activities. SDG&E shall also post notices at the access road to the proposed substation and in public areas, including recreational use areas, within 300 feet of the project alignment and construction work areas SDG&E's right-of-way where the right-of-way is located within 300 feet of designated trails, public parks, and roads. The announcement shall state specifically where and when construction will occur in the area. For areas that would be exposed to helicopter noise, the announcement shall provide specific details on the schedule of the dates, times, and duration of helicopter activities. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.

SDG&E shall identify and provide a public liaison person before and during construction through project energization to respond to concerns of neighboring receptors, including residents, about noise construction disturbance. SDG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction through project energization and develop procedures for responding to callers. Procedures for reaching the public liaison officer via telephone or in person shall be included in the above notices and also posted conspicuously at the construction site(s). SDG&E ~~will~~ shall address all complaints ~~in a~~ within one week of when the complaint is filed. SDG&E shall provide monthly reports with records of complaints and responses to the CPUC. These reports shall be provided to CPUC within 15 days of the end of the month.

- B1-142 Mitigation Measure Aesthetics-1 is revised to clarify that the measure would partially screen views of the substation. Mitigation Measure Aesthetics-1 is revised as follows:

The purpose of the Landscaping and Irrigation Plan is to ensure successful revegetation of the substation slope to partially screen the facility from view within a period of 5 years after construction.

- B1-143 Mitigation Measure Aesthetics-2 is revised to clarify both the color specifications of the retaining walls and the application of color treatments. Color treatments are not applied to the proposed power poles. Mitigation Measure Aesthetics-2 is revised as follows:

Mitigation Measure Aesthetics-2: SDG&E shall prepare a Facilities Color Treatment Plan describing the application of colors to all new facility

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buildings, walls and fences at the Salt Creek Substation. The proposed color treatments shall minimize visual intrusion and contrast by blending the facilities with the landscape. Color specifications for the verdura retaining wall and masonry walls shall be based on standard color palettes from the providers. The Plan shall be submitted to CPUC for review and approval at least 90 days prior to (a) ordering the first exterior building components to be color treated, or (b) construction of any exterior building component, whichever comes first. The Facilities Color Treatment Plan shall include:

- Specification, and 11 × 17 inch color simulations ~~at life-size to~~ scale, of the treatment proposed for use on project structures
- List of each major project structure, building, ~~tower and/or pole,~~ and fencing specifying the color(s) and finish proposed for each (colors must be identified by name and by vendor brand or a universal designation)

B1-144 Optional Measure Aesthetics-1 is not a required mitigation measure, rather it is a suggestion to further reduce aesthetic impacts. Miguel Substation staging yard is an existing unscreened yard that is not in view from sensitive viewing areas and screening of that staging yard would not reduce impacts; therefore, the optional measure has been revised as follows:

Optional Measure Aesthetics-1: SDG&E should install opaque mesh along the fence of all staging yards, with the exception of the Miguel Substation staging yard, used for the proposed project to screen the view of the staging yards from public vantage points, such as roads.

B1-145 The intent of Mitigation Measure Hydro-3 is to require and verify design of the detention basin in accordance with the City of Chula Vista Development Stormwater Manual. The stormwater facilities originally listed as part of the mitigation measure are included in greater detail in the City of Chula Vista Development Stormwater Manual. The specific types originally listed have been removed to not limit the types of potential stormwater facilities that could be implemented. This revision does not change the requirements of the measure. Mitigation Measure Hydro-3 is revised as follows:

Mitigation Measure Hydro-3: The water detention basin to be installed at the substation site shall be designed in accordance with the City of Chula Vista Development Stormwater Manual, ~~which approves use of the following types of stormwater facilities:~~

- ~~Infiltration facilities or practices, including dry wells, infiltration trenches, infiltration basins, and other facilities that infiltrate runoff to native soils (sized to detain and infiltrate a volume equivalent to the 85th percentile 24-hour event)~~

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- ~~• Bioretention facilities and media filters that detain stormwater and filter it slowly (at the rate of about 5 inches per hour) through soil or sand (sized with a surface area of at least 0.04 times the effectively impervious tributary area, or as approved by the City Engineer)~~
- ~~• Extended detention basins, wet ponds, and wetlands or other facilities using settling (sized to detain a volume equivalent to runoff from the tributary area generated by the 85th percentile 24-hour event)~~

The stormwater detention basin design shall be submitted to the City and CPUC for review and approval no less than 60 days prior to construction.

- B1-146 Mitigation Measure Aesthetics-3 is designed to reduce significant glare impacts resulting from untreated steel at the substation and use of untreated steel on new poles. While SDG&E notes that undulled steel will weather over time, there would be a period where the impact would be significant after installation of untreated steel, and it is feasible to mitigate this impact by dulling the steel. Samples of the dulled steel are needed to verify that the manufacturer treatment in fact reduces glare and meets the requirements of the mitigation measure. No change is required.
- B1-147 Mitigation Measure Aesthetics-1 has been revised to reflect the presence of a Draft Landscape Plan in the EIR and the fact that the landscaping is installed after the majority of the substation is constructed. The mitigation measure previously required submittal of a plan prior to construction. The modification requires submittal of the plan 120 days prior to acquisition of landscape materials. This plan may require more than one round of review and revision to meet the requirements in the mitigation measure. Because the plan is not being submitted prior to construction, a period of 120 days is necessary to allow the CPUC sufficient review and revisions to the plan prior to purchase of seed and landscape materials. Mitigation Measure Aesthetics-1 is revised as follows:
- Mitigation Measure Aesthetics-1:** SDG&E shall submit a Landscaping and Irrigation Plan to the CPUC for review and approval no less than ~~3~~ 120 days prior to acquisition of landscape materials construction.
- B1-148 Refer to response to comment B1-20 and B1-144.
- B1-149 Refer to response to comment B1-71.
- B1-150 The revisions to APM AIR-3 were provided to SDG&E on July 24, 2014. SDG&E did not note any changes to the measure that is in the EIR at that time. The language in the APM is necessary to demonstrate that the project does not conflict with CARB control measures for VOC's. The VOC limits defined in the APM are required; therefore, no changes are made to the APM.
- B1-151 Refer to response to comment B1-110.

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- B1-152 SDG&E will be required to prepare and submit to Caltrans a Highway Closure Plan, as required by Caltrans. Refer to comment letter A2 from Caltrans District 11 and to the revised Mitigation Measure Traffic-1 in response to comment A2-1.
- B1-153 The sentence regarding the use of steel plating for foundation excavation was replaced with the following in Chapter 2, Section 2.7.6:
- ~~Steel plating would be placed over excavated holes prior to pole installation.~~
If a foundation excavation is left open prior to steel cage and concrete placement, the excavation shall be covered and secured with steel plating.
- B1-154 The height of the concrete foundation above grade was corrected in Chapter 2, Section 2.7.6 as follows:
- Concrete would be ~~poured~~ placed for the foundation, extending ~~6~~ 18 to 24 inches above grade.
- B1-155 The numbering of the table for Required Permits and Approvals is corrected from Table 2.10-1 to Table 2.9-1 in Chapter 2.
- B1-156 Chapter 2, Section 2.10.4 has been revised to add the World Health Organization to the listing of agencies that have reviewed EMF research to determine whether health standards are necessary.
- B1-157 The distribution circuits are added to the list of EMF sources associated with the proposed project in Chapter 2, Section 2.10.6.
- B1-158 The discussion of possible EMF reduction measures is revised for consistency with SDG&E's EMF Design Guidelines for Electrical Facilities. The original text provided example EMF reduction measures, which has been updated for consistency with the EMF Design Guidelines. The EMF reduction measures are not limited to the examples shown in the text and the revision would not result in new significant information. The text is revised in Chapter 2, Section 2.10.6 as follows:

The CPUC issued decisions regarding EMF in 1993 (D.93-11-013) and 2006 (D.06-01-042). The 2006 decision re-affirmed a key finding of the 1993 decision, stating that "a direct link between exposure to EMF and human health effects has yet to be proven despite numerous studies including a study ordered by this Commission and conducted by DHS [Department of Health Services]". In the decisions, the CPUC directed utilities to consider "no cost" and "low cost" measures to reduce public exposure to EMF from new or upgraded electrical utility facilities up to approximately four percent of total project cost. In order to comply with direction from the CPUC, SDG&E developed its EMF Design Guidelines for Electrical Facilities and filed the guidelines with the CPUC in 2006. The following are examples of possible EMF reduction measures identified

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in SDG&E's EMF Design Guidelines for Electrical Facilities in accordance with CPUC Decision s 93-11-013 and 06-01-042:

- ~~Increase distance from conductors and equipment~~
- ~~Reduced conductor spacing~~
- ~~Minimize current in conductors~~
- ~~Optimize phase configuration~~
- ~~Maximize distance between aboveground conductors at substations and the public ROW~~
- ~~Maximize distance between underground cables and nearby sidewalks and buildings~~
- ~~Increase burial depth of the duct bank~~
- ~~Increase distance between overhead conductors and the ground~~
- Increase the distance from electrical facilities by:
 - Increasing structure height
 - Increasing burial depth of the duct bank
 - Locating power lines closer to the centerline of the corridor
- Reduce conductor spacing
- Phase circuits to reduce magnetic fields

B1-159 A period was inadvertently added to the end of the text under Section 3.4.1; the period has been removed, and the sentence continues below Figure 3.4-1.

B1-160 The text under Section 3.4.3 has been revised to clarify the description of the Alternative 3 overhead route:

The proposed 69-kV line would be overhead within the Miguel Substation in the same configuration as the proposed project. At the edge of the Miguel Substation, The overhead line would continue along the SDG&E ROW until its intersection with Mountain Miguel Road, where the power line would transition underground via a cable pole.

B1-161 Table 4.1-7 provides the level of visual impact resulting from the substation rather than the power line. "Power line" has been revised to "substation" as follows:

Table 4.1-7 provides the level of visual impact resulting from addition of the proposed ~~power line~~ substation.

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- B1-162 Table 4.3-4 incorrectly listed the primary annual NAAQS for PM_{2.5} as 15 µg/m³. The NAAQS primary standard for PM_{2.5} has been corrected in Table 4.3-4 to 12 µg/m³. This revision does not alter the air quality analysis or impact conclusions.
- B1-163 The discussion of impacts to California horned lark incorrectly referenced Mitigation Measure Biology-7 rather than Mitigation Measure Biology-6. The reference is corrected to Mitigation Measure Biology-6.
- B1-164 The abbreviation NCCP was mistyped as NNCP on page 4.4-19 of the Draft EIR. “NNCP” was corrected to “NCCP.”
- B1-165 The regulatory setting for the City of Chula Vista General Plan is intended to discuss the General Plan and its components, not the location of the proposed substation site in relation to MSCP Preserve areas. The location of the proposed substation site is discussed in Section 4.4.1, Preserve Areas. A sentence has been added to Section 4.4.1 to clarify that the substation site would not be located within a MSCP Preserve.
- ~~To the south, a~~ The City of Chula Vista MSCP Subarea Preserve lies immediately adjacent to and east of the proposed substation site; the proposed substation site is not located within a MSCP Preserve.
- B1-166 Comment noted. The CPUC reviewed the 2014 surveys and concluded that the surveys did not offer any supplementary information that would affect the impact analysis, necessary mitigation, or significance conclusions determined for the proposed project. The year in which the surveys were performed, 2014, experienced particularly harsh drought conditions, which was noted in the surveys. Harsh drought conditions likely affected species counts, resulting in possibly skewed data. Therefore, the CPUC deemed it appropriate to use data from previously biological surveys, including the Biological Resources Technical Report prepared for the PEA, to assess impacts on biological resources with the project area and BSA.
- B1-167 The typo under Section 4.5.2 of the Draft EIR is corrected; “cultural resource” was corrected to “cultural resources.”
- B1-168 The sentence in Section 4.6.1 has been revised to clarify that clay fill materials present within access roads are specific to access roads near the proposed substation site and not along the entire TL 6965 alignment. The text is revised as follows:
- Fill materials present along portions of the access roads to the proposed substation site are clays primarily associated with construction of Hunte Parkway.
- B1-169 Information derived from the outdated Uniform Building Code have been replaced as follow with peak ground acceleration data calculated by the Ground Motion Interpolator. The revisions are shown in Section 4.6 Geology and Soils as follows:

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~~The proposed project is within an area anticipated to experience a peak ground acceleration (PGA) of approximately 0.4 g (g is the acceleration due to gravity) with a two percent probability of exceedance in 50 years (CDC 2008). The PGA of 0.4 g correlates with a level VII earthquake based on the Mercalli scale, which would generate severe shaking and moderate to heavy damage (USGS 2011). San Diego County is entirely located in Seismic Zone 4, as defined by the most recent Uniform Building Code. Seismic Zone 4 areas include those closest to active faults that are expected to experience ground motion during an earthquake of at least 0.40 g (g is the acceleration due to gravity).~~

Chapter 10 References is revised as follows:

~~California Department of Conservation (CDC). 2008. Ground Motion Interpolator. Accessed September 1, 2015. Available at http://www.quake.ca.gov/gmaps/PSHA/psha_interpolator.html.~~

~~United States Geologic Survey (USGS). 2011. ShakeMap Scientific Background. March 9, 2011. Accessed September 1, 2015. Available at <http://earthquake.usgs.gov/earthquakes/shakemap/background.php>.~~

- B1-170 The term unstable in the Draft EIR referred to the moderate to severe erosion potential of the soils. The sentences under Section 4.6.5 have been revised as follows to clarify that the soils along the TL 6965 corridor have a moderate to severe erosion potential:

Alternative 1 would avoid ~~unstable moderate to severe erosive~~ soils units only found along the transmission line corridor, including Linne clay loam and San Miguel-Exchequer rocky silt loam.

Alternative 2 would avoid ~~unstable moderate to severe erosive~~ soils units only found along the transmission line corridor, including Linne clay loam and San Miguel-Exchequer rocky silt loam.

- B1-171 Sentences in Section 4.6.5 have been revised to more clearly define the origin of impacts from Alternatives 1, 2, and 3. The revised text is shown below:

Geotechnical recommendations and measures to minimize effects to people and structures from the ~~presence of unstable geologic units and soils destabilization of slopes during grading and artificial slope creation~~ would be implemented in the final design, as described in APM GEO-1. APM GEO-2 requires SDG&E to follow applicable building codes and seismic standards. APMs GEO-1 and GEO-2 would reduce impacts associated with ~~destabilized geologic units and~~ soils ~~from grading and artificial slope creation~~. Impacts from seismic events and unstable geologic units and soils would be less than significant, and no mitigation is required.

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B1-172 Construction of the Alternative 3 underground power line in City roadways would not cause soil destabilization because the underground power line would be constructed in an existing road with compacted engineered fill material. The discussion of Alternative 3 impacts is revised as follows:

Construction of the underground power line within roadways ~~could~~ **would not** destabilize soils **because the roadway is constructed on compacted engineered fill, which is highly stable, and the underground power line construction would include compacted engineered fill and asphalt above the duct bank.**

B1-173 Refer to response to Comment B1-106.

B1-174 The Global Warming Potentials (GWP) of methane, nitrous oxide, and sulfur hexafluoride were revised to 28, 265, and 23,500, respectively, to reflect updated GWPs in the Intergovernmental Panel on Climate Change’s (IPCC) Fifth Assessment Report (IPCC 2013). The quantitative analysis presented in Section 4.7: Greenhouse Gas Emissions has been revised to reflect updates to GWPs. The revised quantitative analysis does not change the conclusion that greenhouse gas emissions from the proposed project and all alternatives would be less than significant.

B1-175 The CPUC has revised the summary of nearby hazardous sites in Section 4.8.1 to correct the chemical of concern. The entire project area was previously used for agricultural production and the chemicals of concern are associated with the agricultural use of the area. Section 4.8.1 is revised as follows:

The three sites were assessed for presence of ~~lead~~ **arsenic and pesticides** in soil due to historical activities (i.e., agriculture) and do not require any further environmental action.

Table 4.8-1 is revised to reflect a GeoTracker/EnviroStor search performed in July 2015:

Site Name and Address	Approximate Distance and Direction from Project Site	Affected Medium	Chemical of Concern	Status
Middle School No. 12/High School No. 14, Eastlake Parkway and Hunte Parkway, Chula Vista, CA (proposed) ¹	Within Hunte Parkway staging yard site	Soil	Arsenic, DDD, DDE, DDT	No Further Action (closed)
San Miguel Elementary School Site, 2175 Proctor Valley Road, Chula Vista, CA ²	0.1 mile west of power line corridor	Soil	Lead <u>None</u>	No Action Required (closed)
Otay Ranch Village 11; S-1 School Site, 1650 Exploration Falls Drive, Chula Vista CA ^{1,3}	0.2 mile north-northeast of Hunte Parkway staging yard	Soil	Lead <u>Methane, Arsenic, DDD, DDE, and DDT</u>	No Further Action (closed)

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Site Name and Address	Approximate Distance and Direction from Project Site	Affected Medium	Chemical of Concern	Status
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Notes:

- ¹ Site is included in September 11, 2012, EDR report.
- ² Has since been renamed Liberty Elementary School.
- ³ Corresponds to two separate cases in EnviroStor database: cases 60000102 and 60000797.

Source: DTSC ~~2013~~ 2015

- B1-176 Refer to response to comment B1-175.
- B1-177 Refer to response to comment B1-175.
- B1-178 Refer to response to comment B1-175.
- B1-179 Title 33 CFR Part 112, Oil Pollution Prevention, is codified under the Clean Water Act, which spans Title 33 CFR Parts 100 – 140, 401 – 471, and 501 – 503.
- B1-180 The discussion of the Construction General Permit is revised to include its amendments, 2010-0014-DWQ and 2012-0006-DWQ, in Chapter 2: Project Description, Section 4.6: Geology and Soils, Section 4.8: Hazards and Hazardous Materials, and Section 4.9: Hydrology and Water Quality. This revision also includes the following revision to APM HYDRO-1:
- APM HYDRO-1: Stormwater Pollution Prevention Plan.** SDG&E shall obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires submittal of Permit Registration Documents (PRDs) to the State Water Resources Control Board.
- B1-181 The CPUC acknowledges that APM HAZ-2 does not apply to transportation or mobile sources; however, impacts as a result of accidental spills from transportation or mobile sources would be mitigated through implementation of APM HAZ-1 and APM HYDRO-1.
- B1-182 The number of natural gas meters has been revised from 850,000 to 868,000 in Chapter 4.15, Section 4.15.1.
- SDG&E provides gas and electric service to the City and the unincorporated areas of the County. SDG&E provides energy service to 3.4 million people through 1.4 million electric meters and ~~850,000~~ 868,000 natural gas meters in San Diego County and southern Orange County, with a service territory spanning approximately 4,100 square miles (SDG&E 2013, 2015b).
- B1-183 The CPUC revised the sentence in Chapter 4.15, Section 4.15.5 as follows:

3 COMMENTS AND RESPONSES

AC can cause corrosion on buried utility pipelines located near a power line if the current density would exceed the design standards for ~~protection of AC~~ corrosion mechanisms on the power line.

B1-184 The CPUC revised the sentence in Chapter 4.15, Impact Utilities-8 to reflect the conditions when induced current can cause corrosion on buried pipelines as follows:

Induced current can cause corrosion on buried pipelines as a result of AC electrical current leaving the metal pipeline surface at a defect in the pipeline coating.

3 COMMENTS AND RESPONSES

3.3 INDIVIDUAL COMMENTS AND RESPONSES

This section includes comments received from individuals in letters, emails and during the public meeting on June 4, 2015. Comments are delineated with responses to each comment.

3 COMMENTS AND RESPONSES



Comment Letter C1

Opposed to Salt Creek Substation

1 message

Jonathan Greenwood (jogreenw) <jogreenw@cisco.com>
To: "saltcreeksub@panoramaenv.com" <saltcreeksub@panoramaenv.com>

Thu, Jun 4, 2015 at 5:29 PM

Hello,

C1-1 I'm a resident in the Windingwalk community residing at 2358 Trellis St. Chula Vista, CA 91915 and I'm greatly opposed to this project being built directly adjacent to Hunte Parkway and Exploration Falls Drive. My backyard directly faces Hunte Parkway and I have serious concerns for the health, safety, environment, and home property value for my family along with everyone else in the community.

C1-2 Requesting if this can be pushed further away from community as many are becoming more aware of what a substation is and how it would look similar to the massive San Miguel Substation located off the 125fwy in a remote location.

Respectfully,



Jonathan Greenwood II, CCIE #22744
Network Consulting Engineer
US Public Sector Advanced Services
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3.3.1 Response to Letter C1: Jonathan Greenwood

C1-1 Comment noted. Health and safety concerns are addressed in the following sections of the EIR:

- Chapter 2: Project Description, discusses electromagnetic fields;
- Section 4.3: Air Quality discusses toxic air contaminants;
- Section 4.8: Hazards and Hazardous Materials discusses hazardous substances, shock hazards, and fires
- Section 4.9: Hydrology and Water Quality discusses floods; and
- Section 4.14: Transportation and Traffic discusses hazards from changes in traffic flow and damage to roadways.

The EIR is intended to analyze all impacts from the proposed project on the environment. Impacts specific to biological resources are discussed in Section 4.4.

Regarding potential impacts to property values, CEQA Guidelines Section 15131 limit the analysis of economic impacts to an analysis of the environmental change that would have an anticipated economic impact. Specifically:

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

C1-2 Alternative substation locations were considered during the alternatives screening process, including a site located farther south of Hunte Parkway than the proposed location. The alternative substation locations and rationale for elimination are provided in Section 4.4 of the Alternatives Screening Report (Appendix E of the Draft EIR). These alternative substation locations were rejected due to conflicts with on-going development projects, proximity to schools, and greater impacts on biological resources, geology, and hazards.

The proposed Salt Creek Substation would be a low-profile 69/12-kV substation and much smaller than the 500/230-kV Miguel Substation. A brief discussion of this comparison of the Salt Creek Substation to other substations in the area occurred during the public meeting, which is documented in the Draft EIR Public Meeting Transcript included in Appendix A.

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SALT CREEK SUBSTATION PROJECT
DRAFT EIR PUBLIC MEETING COMMENT

You should be aware that your comments (including your personal identifying information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.

Comment Letter C2

Name: Janice Gutierrez
Address: 920 Norella St. Chula Vista, CA 91910
Phone: (619) 203-1597
Email: Janice.GutierrezCV@gmail.com

Write your comment in the space below. Attach additional sheets or use the back of this sheet if you need more space.

Good evening! My name is Janice Gutierrez and I am an elementary school teacher here in Chula Vista. I believe that the Saltcreek Substation will be an asset to this community because it will increase the reliability of electricity. Thank you.

C2-1

3 COMMENTS AND RESPONSES

3.3.2 Response to Letter C2: Janice Gutierrez

C2-1 Comment noted.

3 COMMENTS AND RESPONSES



SALT CREEK SUBSTATION PROJECT DRAFT EIR PUBLIC MEETING COMMENT

You should be aware that your comments (including your personal identifying information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we cannot guarantee that we will be able to do so.

Comment Letter C3

Name: Melvin A. Torres
Address: 1823 Plaza Palo Alto, Chula Vista, CA 91914
Phone: 415-378-9350
Email: torresm-us@yahoo.com

Write your comment in the space below. Attach additional sheets or use the back of this sheet if you need more space.

The current project as applied for appears reasonable but why wasn't the "Environmentally Superior" option selected. I trust the process and support the current project as applied for.

C3-1

3 COMMENTS AND RESPONSES

3.3.3 Response to Letter C3: Marco Torres

- C3-1 The CPUC has not made a decision on SDG&E's application for a PTC. The CPUC may select the proposed project, an alternative, or deny SDG&E's permit. The CPUC will consider the environmental analysis in the EIR, including the alternative analysis, when making a decision on SDG&E's application for a PTC.

3 COMMENTS AND RESPONSES

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**CPUC PUBLIC MEETING
FOR DRAFT ENVIRONMENTAL IMPACT REPORT**

**SAN DIEGO GAS & ELECTRIC COMPANY
SALT CREEK SUBSTATION PROJECT**

CHULA VISTA, CALIFORNIA

JUNE 4, 2015

REPORTED BY: Kathryn L. Edwards, CSR No. 7288

Peterson Reporting Video & Litigation

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PRESENTERS:

For Panorama Environmental, Inc.:

SUSANNE HEIM

One Embarcadero Center

Suite 740

San Francisco, California 94111

650-373-1200

For California Public Utilities Commission

CONNIE CHEN

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CHULA VISTA, CALIFORNIA

THURSDAY, June 4, 2015, 6:00 p.m.

-o0o-

MS. HEIM: The purpose of the meeting tonight is to go over the San Diego Gas & Electric Company Salt Creek Substation Project. We're going to give you an overview of the CPUC process for the application. We're going to describe the proposed project and the objectives and then we're going to discuss the impacts of the project and alternatives that were considered by the CPUC. And then after we've gone through that process, we'll take comments.

So if you have oral comments, we have a stenographer here tonight, who is going to take your comments, and we can also receive written comments. So if you want to leave written comments, there is a box over there, and you can just drop them in the box on your way out. And if you want to have more time to think about your comments, you can also send them later in writing, in an e-mail. So we'll give you the e-mail address and also in the presentation.

So the California Public Utilities Commission (CPUC) is the lead agency under the California Environmental Quality Act (CEQA), and they're the entity that prepared the Draft Environmental Impact Report.

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1 Panorama Environmental is a consultant to the California
2 Public Utilities Commission.

3 So I'll introduce Connie Chen. She's here with
4 the CPUC, and she's going to talk about the CPUC
5 process.

6 MS. CHEN: Okay. The CPUC regulates investors
7 in utilities, such as San Diego Gas & Electric, and so
8 they're required to submit permits to the CPUC to build
9 certain infrastructures under Public Utilities Code
10 Section 1001. And so San Diego Gas & Electric has
11 submitted an application to the CPUC, and we have
12 authority to approve or deny the process. So CPUC has
13 reviewed the application through two concurrent
14 processes, CEQA and the CPUC proceeding. And so right
15 now we've published the document, and now we're in the
16 public comment period, which ends June 29, 2015. And
17 the hearing process we are in currently is for the
18 prehearing conference. Typically prehearing conferences
19 are scheduled after the release of the draft
20 environmental documents. So that's where we're at in
21 the process.

22 MS. HEIM: I'll talk a little bit about the
23 basic project objectives. The primary objectives of the
24 project are to meet the electric distribution capacity
25 of the area. So there's been a lot of growth in the

1 area and there is a need to provide additional electric
2 distribution and to improve reliability. And SDG&E also
3 wants to improve their operational flexibility to
4 transfer loads between substations.

5 The project proposed here, it's very close to
6 this area, but at a closer scale you can see it on the
7 map to the right over there, where you can see it's just
8 south of Hunte Parkway, where the substation will go,
9 and then the power lines will go within the existing
10 transmission corridor from the Miguel Substation to the
11 Salt Creek Substation.

12 The project components include a new Salt Creek
13 Substation. So that is a 120 12-kV substation that
14 would be constructed on 11 acres just south of Hunte
15 Parkway, and there would be three underground 12-kV
16 distribution circuits to Hunte Parkway. Then there
17 would be a new 69-kV power line, on new steel poles,
18 between the substation on Hunte Parkway and the Miguel
19 Substation, and there would be some minor modifications
20 at Miguel Substation.

21 The construction schedule is estimated to be
22 about 18 to 24 months to build the substation and power
23 lines, and it's anticipated to begin in early 2016 and
24 then finish about late 2017. It will be up to 91
25 workers on the site each day, during the peak of

1 construction, and work hours would be those that are
2 considered the normal construction hours in the City of
3 Chula Vista; although, there may be some periods where
4 they have to do the work of construction around the
5 clock. And there would be general construction
6 equipment on the site, and helicopters could be used for
7 up to a week when they're stringing the new power line.

8 This gives you a view of the substation site
9 that currently exists. There would be grading of the
10 site to create and construct a new flat pad for the
11 substation equipment to sit on top of, and they would
12 widen the existing City of Chula Vista access road to
13 accommodate the construction equipment and getting in
14 and out of the site. And then they're going to
15 construct the three new underground distribution
16 circuits and connect in the 69-kV power line within the
17 corridor. And that construction will last about 18 to
18 24 months.

19 This is an overview of what the substation
20 looks like. So the area in the yellow, that's the
21 substation pad, and then the purple lines are the
22 distribution lines that would connect up to Hunte
23 Parkway. And you have the light blue line. That's the
24 new power lines to the substation, and the green line is
25 to tie in.

1 The new 69-kV line is a five-mile-long overhead
2 69-kV power line. It would run between the Miguel
3 Substation and the new substation, and it would be
4 located in the transmission corridor to the east of the
5 existing tower. So there is a large 230-kV tower in a
6 120-foot-wide right-of-way, and this would be located
7 about 45 feet east of those, and it would be constructed
8 on new galvanized steel poles. And the duration to
9 construct that line is about a year.

10 Other project components; work areas. There
11 would be staging areas. You can see some of them on the
12 map to the right there, in orange. Those are areas that
13 may be used for staging during construction and material
14 laydown. There's also stringing sites. So when they're
15 tightening the line, they have some work areas where
16 they'll need to come in, for a short period of time, to
17 apply tension and pull the line in. And then there's
18 also -- Within the staging areas there would be
19 helicopter landing zones, for the weeks that they need
20 the helicopters. And access roads are primarily
21 existing access roads, but there may be some new access
22 roads, from the existing access roads, to the new pole
23 site.

24 During operation and maintenance, the
25 substation would be unattended. There would be weekly

1 inspections, and the vegetation around the poles would
2 need to be trimmed regularly as required. And equipment
3 would be repaired and/or replaced as needed during
4 regular maintenance.

5 So we're going to talk a little bit about the
6 Draft EIR and what's discussed in there. On this line
7 you can see all the topics that were covered in the
8 Draft EIR, and in the red we show the ones that have
9 significant impact. So I'll be talking about those a
10 little bit more in a moment.

11 In the EIR we describe the impact of the
12 project. We also discuss the impact prior to
13 applicant-proposed measures. So those are measures that
14 would be implemented by San Diego Gas & Electric. We
15 described what the impact is after those measures are
16 implemented. And then we -- if there's any significant
17 impacts that are remaining, we define mitigation
18 measures that would reduce the impact.

19 The first significant impact we'll talk about
20 is aesthetics. We give a pretty good idea of what that
21 looks like from the posters on the sides, if you want to
22 get an idea of what the substation is going to look
23 like. The impact is primarily the view of the
24 substation from Hunte Parkway, from the City of
25 Chula Vista Greenbelt and areas to the south. So those

1 views would be impacted.

2 Views along Hunte Parkway, for motorists,
3 there's only about 30 seconds that a motorist would be
4 able to see the view. So that impact is a fairly short
5 duration, but there is a longer duration impact for
6 people who may be using the trails adjacent to the
7 substation and those who are traveling from north to
8 south along Hunte Parkway. But, actually, the
9 substation would actually be screened from view because
10 of the elevation drop. So the substation is set below
11 the grade and elevation of Hunte Parkway, such that, if
12 you're standing on the -- I believe it's the -- to the
13 left, the west side of the road, the northwest side of
14 the road, you wouldn't be able to see the substation
15 from the road.

16 So in order to assess the visual impact, what
17 we did in the EIR, and you can take a look at it in
18 here, with all the simulations, there were 15
19 simulations that were done, and we rated those
20 simulations to assess the change in visual quality. And
21 where there was a significant change or a significant
22 impact, we defined mitigation. And in the case of
23 aesthetics, the mitigation is -- for the substation, is
24 to landscape and make sure the landscaping is
25 successful; that is, the vegetation and trees that would

1 be planted would block the view of the substation.

2 And that mitigation, it will take time to
3 implement. So initially they're going to be
4 constructing the site, and then they're going to
5 landscape the area, and there will be some time for the
6 trees to grow in. So that impact would be less than
7 significant, but it would be after a period of five
8 years.

9 (Indicating) That's a simulation for the
10 proposed area, and that's what it looks like after
11 mitigation.

12 (Indicating) And here is a simulation of the
13 power lines.

14 And so it ends up being fairly similar to form
15 and color to the existing structures. So the power
16 lines' impact were considered to be less than
17 significant.

18 The next significant impact is noise, and the
19 noise is generated from the construction equipment and
20 the helicopters. It's a temporary impact, but it is
21 significant because it will cause an increase in noise
22 level in the vicinity of the project. So for when
23 they're doing work, if you live right near a work area,
24 you would hear an increase in noise levels during the
25 period of construction during the day. And if you're

1 near a substation, you would hear that noise for the
2 period of construction, from 18 months to two years.

3 So the mitigation is notification of residents.
4 There's also requirements to put up noise barriers. So
5 specifically at the substation, where they'll do work
6 for a couple of years, they may need to put up a noise
7 barrier to minimize that impact. And also, coordination
8 with schools, so that when the helicopters were flying
9 it wouldn't interrupt.

10 Then the last significant impact is the views
11 of substation and the increase in noise levels could
12 impact the recreational value of the trails and
13 recreational resources around the substation. So this
14 is directly related to the two previous impacts, where
15 the -- if you're walking on a trail that's near the
16 substation, you're going to have a view of it, and that
17 could decrease your -- the value of that resource when
18 you're standing there. And so the landscaping also
19 mitigates that impact.

20 Under CEQA, the CPUC evaluated alternatives to
21 the proposed project. So there was a range of
22 alternatives that were screened. We started out with 18
23 alternatives, and then we screened them relative to the
24 project objectives, to see if they ultimately achieved
25 the project objectives. We then looked at whether or

1 not the alternatives were legally feasible, meaning that
2 you could legally construct them on the project; whether
3 they were regulatorily feasible, whether you could get
4 approvals from regulatory agencies to construct the
5 project; and whether they were technically feasible,
6 meaning can you engineer it, can you actually do it.
7 And then we evaluated whether or not it would meet
8 environmental criteria, in that would it reduce
9 significant impact or would it somehow -- even if it did
10 reduce the significant impact, could it make other
11 impacts much more severe. So if it made another impact
12 much more severe, it may fall out of screening.

13 So after that screening process, there were --
14 We started out with 18; there were three alternatives
15 that remained.

16 The first alternative is a 230/12-kV substation
17 and 230-kV loop-in. So that alternative would be
18 constructed on the same site as the proposed substation,
19 but it would be a larger 230-kV substation and it would
20 loop in the existing 230-kV lines in the corridor.

21 So this alternative reduced impact, because it
22 would have avoided construction of a new power line.
23 There's no need to put in a new line. But it did
24 increase impact, because it resulted in taller -- in a
25 taller substation, which would be visible for the life

1 of the project. So the visual screening was not able to
2 reduce the impact. The aesthetics were less than
3 desirable. So it was not environmentally superior.

4 (Indicating) This gives you an idea of what it
5 looks like after construction. You can see the Salt
6 Creek Substation. You have a taller structure, and it's
7 still visible even with the mitigation.

8 The second alternative is the 69-kV substation
9 with additional generation at two electric generating
10 facilities.

11 So this alternative reduced impact because it
12 obviated the need to build a new 69-kV power line. So
13 you still have the same substation being built, in the
14 same location as the proposed project, but you don't
15 have the new power line. There's no impact from the
16 power line.

17 And this was the environmentally superior
18 alternative because it avoided all the impacts of power
19 lines, without any impacts -- visual impacts from this
20 project.

21 Then the third alternative is the 69-kV
22 substation, in the same location, with an underground
23 power line on Hunte Parkway, Proctor Valley Road, and
24 Mount Miguel Road. And so it reduced the impacts from
25 the power line on biological resources, cultural

1 resources, and potential hazards, but it overall
2 increased traffic impact substantially. So it was also
3 not environmentally superior.

4 We also looked at the no project alternative,
5 which is required under CEQA. So the no project
6 alternative is what would -- what would SDG&E do if the
7 proposed project was not approved. And so SDG&E said
8 that they would build out their existing substation, but
9 even with that build-out, it would not meet the
10 objectives or the need for the project. So over time,
11 electrical service would become less reliable, which
12 could result in significant impact to the utilities and
13 public services.

14 Now I'll talk a little bit about public
15 comments.

16 So part of the purpose of the meeting today is
17 to receive comments on the Draft Environmental Impact
18 Report. The Draft EIR is available for 45 days for
19 public review. So all comments are due by 5:00 p.m. on
20 June 29th. And you can submit comments to us tonight.
21 We have a box where you can leave comment cards. If you
22 want to speak, we have a stenographer here who can take
23 oral comments. Or you can provide written comments, and
24 you can send those to us via e-mail or also via fax.
25 (Indicating) Here are some options, or e-mail.

1 Is there anyone who wanted to speak tonight?

2 AUDIENCE PARTICIPANT: (Jonathan Greenwood)

3 Yeah, I have a question. I live right off Trellis
4 Street, 2358, which is -- literally my back yard faces
5 Hunte Parkway. So I will be directly impacted by this.

C4-1

6 As far as the noise, what noise -- I didn't
7 hear or see in the report the noise that the power
8 substation in itself would generate. Because at
9 nighttime, where the power lines currently run, it's
10 very loud (demonstrative sound). You can hear it. But
11 during the daytime, for some reason, you don't hear it.
12 So what is the noise going to be produced from the
13 substation?

14 MS. HEIM: Yeah, so the noise -- the permanent
15 noise from the substation is generally considered
16 minimal. I don't think that you would be able to hear
17 it from the other side of Hunte Parkway. So it's not a
18 large producer of noise. I think that -- Yeah, I think
19 there is something about it, if you look in the
20 permanent noise section, you'll be able to find some
21 more information.

22 AUDIENCE PARTICIPANT: (Jonathan Greenwood)

C4-2

23 The other question I have, is there not another
24 location? Like why does it have to be directly up
25 against Hunte Parkway, versus other parts of the creek

C4-2 | 1 or the canyon area?

2 MS. HEIM: That's a good question.

3 So part of the alternatives analysis was
4 evaluation of other sites. So when we did the
5 alternatives analysis, SDG&E also went and did
6 alternatives analysis. There were nine different
7 substation sites that were considered.

8 And part of the challenge with developing a
9 substation in this area, there's a lot of areas that
10 have either been built out or are currently proposed to
11 be built out, under construction, and then you have
12 areas that are also in preserves. And then there's also
13 the need to have access to the transmission corridor, so
14 a place to put in -- bring in the power to the
15 substation.

16 So all of these factors were considered when
17 the alternatives were developed. And there's an
18 alternatives screening report, that's in the document,
19 if you want to look at what the alternative sites that
20 were considered and how they were screened and why one
21 was different than the other.

22 AUDIENCE PARTICIPANT: (Raul Cardenas) Hi. My
23 name is Raul Cardenas. I'm living in the community
C4-3 | 24 area. And exactly the -- For my family or for my
25 neighbors, the concern is for the health for everybody.

C4-3

1 It's a lot of energy. It's a lot of electromagnetic
2 fields that is going to be around the area. That can
3 affect the health for the humans and also will be affect
4 the value for the neighborhood.

C4-4

5 I just reviewed some reports, and I can see
6 that in some areas -- I'm worried -- I don't worry
7 about how aesthetic it's going to be, the place or the
8 building that you're going to building, but I can see
9 that you put in a landscaping. Landscaping, as you
10 know, San Diego right now is in an alert for water.
11 Then at least the City is going to put in some recycling
12 water plants to -- that's landscaping everything.
13 That's going to be nice, but I don't think that that is
14 very nice like this. It's going to be like a desert
15 because of the water now, the problem. Then that's my
16 concern.

17 MS. HEIM: Okay. Are there any other comments?

C4-5

18 AUDIENCE PARTICIPANT: (Marco Torres) Marco
19 Torres. I live over in San Miguel Ranch. And I'm just
20 curious, how did the determination get made to not go
21 with Alternative 2, which it seems like, all other
22 factors being equal, it has an environmentally superior
23 alternative or it was an environmentally superior
24 alternative.

25 MS. HEIM: The alternatives in the process, the

1 CPUC, under CEQA, will evaluate alternatives. So an
2 alternative has not been selected by the CPUC. The CPUC
3 still is undergoing their review process of the project.
4 So we're still in the CEQA process.

5 And actually, what I can do is go back to that
6 slide. I think this might be helpful to show you where
7 we are, and we can talk about what happens to select an
8 alternative.

9 MS. CHEN: I can explain that a little bit.

10 So right now the Draft EIR document came out
11 and there is an environmentally superior alternative
12 from the draft document, and right now we're taking your
13 comments. We're going to make changes to the draft
14 document. We're going to respond to the comments, and
15 that's when we prepare the final document. And the
16 final document leads into this point in the process
17 where the assigned ALJ at the Commission throughout this
18 process prepares the proposed decision.

19 And so there's a separate process, where there
20 could be hearings at the Commission, and all of this
21 information and all of that would be part of the record.
22 And so a decision to select whatever alternatives
23 wouldn't happen until that final decision is voted on by
24 the Commissioners.

C4-6 | 25 AUDIENCE PARTICIPANT: (Marco Torres) So just

1 to be clear, the application right now, as it stands, is
2 for the purpose of developing the Hunte Substation, the
3 current option; right? And is it possible that the
4 alternative might ultimately get decided on?

5 MS. CHEN: Yeah, the Commissioners.

6 AUDIENCE PARTICIPANT: (Marco Torres) The
7 Commission ultimately makes that decision?

8 MS. CHEN: Yes. Does that answer your
9 question?

10 AUDIENCE PARTICIPANT: (Marco Torres) Yes.

11 AUDIENCE PARTICIPANT: (Derrick Roche) I have a
12 question. My name is Derrick Roche. I actually
13 represent Councilman John McCann, whose district is part
14 of Chula Vista.

15 I heard the timelines as far as the
16 construction and everything, but I don't think I
17 missed -- Is there an actual date when they anticipate
18 starting the project?

19 MS. HEIM: I don't think that there is a
20 specific date. I guess that's --

21 AUDIENCE PARTICIPANT: (Derrick Roche)
22 Considering all the reviews and everything I've got, do
23 we have an idea of when that would actually start?

24 MS. HEIM: I think it is dependent on when it
25 gets through the process and the decision is made and

1 they get a contract. Then they'll actually start the
2 construction. So there's -- It's all in line of the
3 process.

4 AUDIENCE PARTICIPANT: (Derrick Roche) Is there
5 a year?

6 AUDIENCE PARTICIPANT: (Andy Renger) Yeah, I
7 mean, depending on when we get the notice to proceed
8 with this, early next year, if things go well.

9 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
10 This is Jonathan Greenwood.

11 Is there another scheduled meeting for the
12 public? Because it appears, even for myself, just the
13 general neighborhood and community is just unaware of
14 what's getting ready to come down the pipeline. And I'm
15 starting to reach out to all my neighbors and folks in
16 the community, to let them know that this massive
17 project power substation is about to be planted right in
18 our backyards, and everybody has concerns.
19 Unfortunately, they couldn't come tonight. But I'm
20 curious, is there another planned meeting on this?

21 And the way that information was communicated
22 in the little postcard, I mean it's not really
23 informative to the community as to what a substation is.
24 Nobody really knows what a substation -- I had to
25 Google it, to figure out that it's something similar to

1 the San Miguel Substation off the 125 Freeway. So there
2 is a lot of concerns there that the community in general
3 is just not well informed on what's actually coming.

4 MS. CHEN: So I wasn't sure if you got a chance
5 to look at the project website. And there's some
6 information on there, especially with the links to the
7 draft environmental document. I think, you know, I
8 understand it's a really big document, but you can look
9 at the executive summary for some idea of what the
10 proposed project is about.

11 At this point in the CEQA process is when we do
12 reach out. We did have a scoping meeting when the
13 application was filed, or after the application was
14 filed, in 2013. Unfortunately, the process itself
15 requires us to reach out at this point when the draft
16 environmental document is prepared.

17 But you could participate in the formal hearing
18 process at the CPUC, and there are special rules in
19 practice and procedure related to that. And if you want
20 to go on the CPUC website, there is a Public Advisors'
21 page that helps individuals and groups who are
22 interested in participating in the hearing process on
23 the other side.

24 And so there will be a prehearing conference
25 scheduled soon. And again, those are typically

1 scheduled after the draft document goes out. And so we
2 will announce that on the CPUC website.

3 AUDIENCE PARTICIPANT: (Jonathan Greenwood) So
4 no mail communication will be sent out to all the
5 residents that will be affected?

6 MS. CHEN: We're still finalizing the
7 documents. So the final EIR will be published and
8 released, and we will be sending mail out to nearby
9 residents.

10 AUDIENCE PARTICIPANT: (Andy Renger) One
11 thing, too, that you were worried about being like
12 Miguel, it's not going to be that big. That's a 500-kV
13 230/138. This is a 69-12 that's proposed. So it's not
14 going to be that big.

15 AUDIENCE PARTICIPANT: (Derrick Roche) Where
16 are the hearings held? Are the hearings local or are
17 they up in San Francisco?

18 MS. CHEN: It depends on what the assigned ALJ
19 decides to do. Typically they're in San Francisco, but
20 if there's a local interest in attending the hearing,
21 they may be held locally. Sometimes they're held
22 telephonically. So we will announce the hearing and
23 there will be a number sent out to call in.

24 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
25 This is Jonathan again.

C4-7

1 For the Alternative 3, the selection -- why
2 that wasn't selected, I'm hearing, was due to traffic
3 impacts. Could you elaborate more on that?

4 MS. HEIM: Yeah. So to install the power line
5 within roads would require having an open trench in the
6 roadway and it would be for many miles. There would
7 also be increased air quality impacts.

8 AUDIENCE PARTICIPANT: (Jonathan Greenwood.)
9 There would be what?

10 MS. HEIM: Air quality impacts, but so there's
11 additional construction emissions associated with it.
12 But mainly it's that you're going to have to have an
13 open trench in the roadway, along six miles, over a
14 period of a year. So they're going to move along the
15 road and impact traffic. So there would be areas that,
16 you know, otherwise wouldn't be impacted by the proposed
17 project because it's overhead and you just cross right
18 over it.

C4-8

19 AUDIENCE PARTICIPANT: (Unidentified) Pardon
20 me. The environmental impacts, as they're discussed
21 here, whether they're superior or not superior, are
22 premised on their environmental impact during the
23 development process or during the long-term life of the
24 project itself?

25 MS. HEIM: So it's both. That's a really brief

1 summary and conclusion of the analysis that's in the
2 EIR, but we consider -- The long-term impacts are given
3 more weight. So if there's a long-term impact that
4 would occur for a number of years -- like, for instance,
5 the alternative one, which is a much larger substation,
6 which has long-term impacts to aesthetics, that impact
7 is given more weight than a temporary impact like noise,
8 which is fleeting and after construction would go away.
9 So there is a relative weight that's given to the impact
10 based on the duration and the intensity.

11 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
12 This is Jonathan Greenwood again.

C4-9 | 13 What's to prevent kids from injuring themselves
14 or entering into that substation, given that, you know,
15 the High Tech High schools are right there. Kids, as
16 they leave school, I see them, you know, playing back
17 there all the time. What's the mitigation or what are
18 you -- how are you guys addressing, not just kids, but
19 anybody getting injured back there?

20 MS. HEIM: You can see there's like a ten- to
21 12-foot wall that surrounds the substation. There's
22 also going to be a locked fence.

23 Is there anything else, like as far as security
24 features you have planned?

25 AUDIENCE PARTICIPANT: (Andy Renger) Yeah, a

C4-10

1 lot of signage to warn people, "High Voltage," but the
2 wall, blocks it. You know, it's just not open for
3 people to walk into the substation.

4 MS. HEIM: SDG&E wants to prevent vandalism, as
5 well. So they don't want people walking through the
6 facility.

7 AUDIENCE PARTICIPANT: (Raul Cardenas) Do you
8 know what section of the 125 will be closed, if it's
9 going to be south or north or if it's going to be closed
10 the whole way?

11 MS. HEIM: The highway?

12 AUDIENCE PARTICIPANT: (Raul Cardenas) The 125
13 Toll Road.

14 MS. HEIM: So there's two crossings of the 125.
15 CalTrans may require temporary closure when the
16 stringing occurs. And oftentimes that happens -- They
17 told us that usually happens during the wee hours of the
18 morning. So like 2:00 a.m. or 4:00 a.m., something like
19 that, when there's not a lot of traffic.

20 But it could happen potentially at the two
21 crossings of the 125, the ones you can see it on the map
22 there. Right here. So this little bit north of
23 Eastlake Parkway and then again over here below "H"
24 Street. Those are the two places.

25 And it would be for -- Usually, when that

1 happens, it's for a couple hours.

2 AUDIENCE PARTICIPANT: (Unidentified) We're
3 here with SDG&E. So we work closely with CalTrans and
4 Highway Patrol. And so just as said, it's very limited
5 hours we're allowed to do it. It's very early in the
6 morning, a couple hours. So it may be a couple hours a
7 couple days in a row.

8 MS. HEIM: It's typically on a Sunday morning.
9 It has to be done by 6:00 o'clock.

10 AUDIENCE PARTICIPANT: (Unidentified.) And
11 then the road is not closed for that period of time.
12 Highway Patrol works with the utility and contractor.
13 They stop traffic for a certain period of time, allow
14 some work to happen, and then work stops, and then they
15 let traffic through, and they just repeat that for a few
16 hours.

17 AUDIENCE PARTICIPANT: (Raul Cardenas) How do
18 we know the extensions for that to close? Because I
19 work in -- to the border, I take the 125 every day. And
20 I took the 125 because it's shorter than to go through
21 the Olympic and get the 805. Then that is going to be
22 more expense for the community, because it's more gas or
23 for the car. Then how would we know the schedules on
24 that closures?

25 MS. HEIM: There is a mitigation measure in the

C4-11

1 EIR that's part of notification of any closures. So
2 there would have to be advanced notification. Usually
3 the CalTrans permits will require some sort of process
4 where there will be notification and require signage if
5 there's going to be a closure.

6 AUDIENCE PARTICIPANT: (Andy Renger) It's not a
7 continuous shut off the highway. They'll stop it for a
8 little bit, let it get to a point where, you know, they
9 can stop work and release the break, let people go
10 through, and then stop it again. And, you know, they
11 kind of phase in and out. So it's not like all day.

12 AUDIENCE PARTICIPANT: (Unidentified) Have you
13 seen -- You've seen Highway Patrol do that for an
14 accident. There's an accident up ahead, they come in,
15 they stop traffic, weave their way across the lanes,
16 slow everybody down. And you get to follow, and they
17 just keep you moving along, and then they release. They
18 have to try to control, and that's exactly what we'll
19 do. So you're not stopped from driving on that road
20 that day. You just may be delayed a few minutes while
21 they control that traffic.

22 MS. HEIM: To be honest, that is addressed in
23 the EIR traffic section, and there's a specific
24 mitigation that deals with that. If you have any
25 comments on that impact and mitigation measure, please

1 feel free to submit it in writing.

C4-12

2 AUDIENCE PARTICIPANT: (Raul Cardenas) Now we
3 are talking about probably, because we are neighbors on
4 that, and we are worried about it, we are talking about
5 just the disadvantage of the project, but do you have
6 the benefits for the existing neighborhood, what the
7 benefits were?

8 AUDIENCE PARTICIPANT: So ultimately it will
9 improve electrical reliability for everybody in the
10 area. So, you know, it's not just the new development.
11 The ultimate objective of the project is improving the
12 electrical reliability, which addresses the whole
13 southeastern area. That's the overall objective of the
14 project.

15 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
16 The grading, the height of the -- I'm sorry. This is
17 Jonathan Greenwood.

C4-13

18 The height that you guys have built around the
19 aesthetics of it, how is that determined and can it go
20 any lower than that? This is like the only place you
21 guys can actually put this?

22 And I say that with concerns of all of the
23 residents that -- whose backyard faces along Hunte
24 Parkway and would have to look at that, you know;
25 whereas, today we have a nice, you know, nature preserve

1 to look at. That will directly change the value and --
2 you know, of the community.

3 MS. HEIM: Is that a comment or --

4 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
5 Yeah. So like what -- how did the height -- It looks
6 like they're building up, versus down.

7 AUDIENCE PARTICIPANT: (Unidentified) So it's
8 kind of hard to see it in that, and I can't remember the
9 exact dimensions, but it's below. Like if you're on the
10 northwest side of Hunte, the other side of Hunte, when
11 you look across, it's not going to be visible, because
12 it's actually below the sidewalk there. So it is sunken
13 down. That's kind of -- You've got to kind of look at
14 some other ones, too.

15 AUDIENCE PARTICIPANT: (Unidentified) There is
16 a key view, I think it's 8, from Hunte Parkway, that you
17 can see, you really can't see the substation from the
18 road. You only see it from the -- This is either from
19 the trail, when you're standing on the edge. But if
20 you're on the other side --

21 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
22 What about from the residents between Hunte Parkway and
23 where Exploration Falls Drive meets up? I live right on
24 Trellis Street. So my backyard faces it directly. So
25 if I'm in my backyard, will I be able to see it?

1 AUDIENCE PARTICIPANT: (Unidentified) This is
2 the simulation right here. You can see the new pole,
3 but you can't actually see the substation. I don't know
4 specifically where your property is. This is directly
5 across the street, I suppose. I don't know if you're
6 looking directly across.

7 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
8 Probably close. Probably a little bit right over here,
9 on this side, but pretty much facing this.

10 Anybody on Trellis Street will be looking at
11 this, west of Exploration Falls Drive. So you're saying
12 it is going to be --

13 AUDIENCE PARTICIPANT: (Unidentified) You look
14 down. It's like a little hill there, and it will be
15 made flat.

16 And in the proposed 69/12-kV sub, it's what we
17 call a low-profile sub. So we try to make those as
18 short as possible and still be within the required
19 height to the ground.

20 AUDIENCE PARTICIPANT: (Jonathan Greenwood) So
21 no poles or overhead wires on like the San Miguel one?

22 AUDIENCE PARTICIPANT: (Unidentified) Oh, you
23 mean the --

24 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
25 Yes.

1 AUDIENCE PARTICIPANT: (Unidentified) No, not
2 that. (Inaudible.)

3 AUDIENCE PARTICIPANT: (Unidentified) Those
4 aren't that high.

5 AUDIENCE PARTICIPANT: (Unidentified) There
6 will be some cables. Proposed there are some cable
7 poles, but not that height.

8 AUDIENCE PARTICIPANT: (Jonathan Greenwood) So
9 when you say there are some new poles --

10 MS. CHEN: Show the simulation.

11 MS. HEIM: Which one? On the other page?

12 AUDIENCE PARTICIPANT: (Jonathan Greenwood)

C4-14 [13 Then what are the guarantees that you guys actually
14 stick to this actual design, and not do something other,
15 after you get a verbal?

16 MS. HEIM: So if there was a substantial
17 modification to the application, they would need to come
18 back to the CPUC, and they would need to file a change
19 per the CPUC. And if it doesn't fall within the box of
20 what was considered under CEQA and there's greater
21 impact, the CPUC would need to do a new CEQA process.
22 So they would need to go back. You'd be notified. You
23 would basically start all over with this project.

24 AUDIENCE PARTICIPANT: (Unidentified) And
25 during construction, they watch us.

1 MS. CHEN: Yeah, we'll be monitoring, during
2 construction, to ensure the proposed project or the
3 approved project is being built. And if SDG&E wanted to
4 come back and make changes to the project, and, as she
5 said, there would be substantial changes, we may need to
6 do a new CEQA process, and that would be a petition for
7 modification, and that would be a separate new process,
8 where we'll be doing public outreach and contacting you
9 all, that we'll be doing that.

10 AUDIENCE PARTICIPANT: (Jonathan Greenwood) Is
11 there anywhere else in the county that has a similar
12 type of substation that we could look at?

13 AUDIENCE PARTICIPANT: (Unidentified) The
14 Mira Mesa one was just built there. 805 and Mira Mesa
15 Boulevard. It's just a 90/12-kV. It's at a higher
16 elevation than this. That's because of the topography
17 in that area.

18 AUDIENCE PARTICIPANT: (Unidentified) Go north
19 on the 5, right where the 805 and 5 meet. It's on the
20 right. I believe it's -- Qualcomm buildings are --
21 There's some office buildings and whatnot. So like I
22 would say, that one is kind of -- You'll be able to see
23 it from the freeway. Try to visualize putting that one
24 down below.

25 AUDIENCE PARTICIPANT: (Unidentified) That's

1 also standard. (Inaudible.) The one in Mira Mesa is in
2 a commercial industrial area.

3 AUDIENCE PARTICIPANT: (Derrick Roche) Excuse
4 me. Is this going to be similar to the one down in Otay
5 Mesa, right by the 905? Will it be similar to that one?

6 AUDIENCE PARTICIPANT: (Unidentified) I
7 haven't seen it. So I don't.

8 AUDIENCE PARTICIPANT: (Derrick Roche) Because
9 that was not a very big one. I've seen it.

10 AUDIENCE PARTICIPANT: (Unidentified) I have
11 to look at that myself. Are you talking about the one
12 near the power plant down there?

13 AUDIENCE PARTICIPANT: (Unidentified) Yeah.
14 Well, no. There's the new one, but there's an older one
15 that's down there, right where the 905 --

16 (Inaudible comments from various audience
17 participants.)

18 MS. HEIM: Are there any other comments?

19 AUDIENCE PARTICIPANT: (Raul Cardenas) Yeah.
20 The last one is, during the construction period, we
21 cannot use the trails, the neighborhood. But in my
22 location is -- right behind me is the existing towers.
23 Where you are planning to put in the other 40 poles for
24 the 69-kV, it's going to be closed? Or how are we going
25 to protect kids that don't go to the park? It's behind

1 to the existing towers. Are they going to close the
2 park? Are they going to close the roads? Or how is it
3 going to work?

4 MS. HEIM: So there's, in the recreation
5 section of the EIR, we discuss the impacts on the
6 trails, and there's mitigation measures about making
7 sure that there's notification about closure to the
8 trails, with regards to safety, but there's also going
9 to need to be alternate detours.

10 So because the construction will be on one side
11 and there's multiple access roads, probably what will
12 happen is they'll close off one of the access roads, to
13 just use for recreational use, and redirect people
14 around. But it's not going to involve any construction
15 areas. It will all be concentration in the transmission
16 corridor.

17 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
18 This is Jonathan Greenwood.

19 How often do you guys reject or what is the
20 ratio of projects of this magnitude that you guys
21 reject?

22 MS. CHEN: I do not have that information.
23 Typically we have to go through the CEQA process again.
24 We, you know, talked about the alternatives process. So
25 we don't necessarily reject projects. We make changes

1 to the project and we look at alternatives that are
2 environmentally superior and still meets project
3 objectives and needs. And ultimately I do not have the
4 number of how many projects we reject.

5 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
6 Okay. How about alternatives? How often do you --
7 would you say you --

8 MS. CHEN: Yeah. So we are required to go --
9 you know, go through the CEQA process. And part of the
10 CEQA process requires us to look at a range of
11 reasonable alternatives and offer an environmentally
12 superior alternative. I do not have the number of times
13 where the environmentally superior alternatives is
14 different from the proposed project, but it is a process
15 we have to go through to determine what is
16 environmentally superior. But I don't have a number of
17 when that's different from the proposed project.

18 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
19 And if you could get those numbers, that would be
20 helpful.

21 You cover all of California; right? So it
22 wouldn't just be for --

23 MS. CHEN: The CPUC regulates investor-owned
24 utilities. So that's PG&E, San Diego Gas & Electric,
25 and Edison.

1 AUDIENCE PARTICIPANT: (Jonathan Greenwood)

2 All right.

3 AUDIENCE PARTICIPANT: (Raul Cardenas) Does
4 the HOA associations know about this? Because I'm
5 concerned that the associations is not here, hearing
6 what we are talking about. Then suppose the association
7 is to help the community, and I don't see any
8 representatives from the association. I don't know if
9 they was informed or not.

10 MS. HEIM: We sent notifications to all
11 residents within 500 feet of the project. And then
12 there's also the standard notifications to agencies. So
13 there's about 400 mailings -- or not 400, but 4,000
14 mailings that went out on the Draft EIR.

15 AUDIENCE PARTICIPANT: (Jonathan Greenwood) So
16 only to residents that are within 500 feet of the actual
17 project, but not necessarily residents in the community
18 that all use that space or have kids that go to the
19 schools, that might live a little bit further up the
20 street or anything of that nature; right? So just
21 within the 500 feet or the entire community?

22 MS. HEIM: So the notification requirements,
23 they're sent out. There are certain requirements under
24 CEQA, and then there's also -- there's other
25 requirements under the CPUC General Order. The General

1 Order requires 300 feet, and CEQA requires notification
2 of agencies. And it's often the 300 feet kind of rule
3 of thumb that's used. And because of the close
4 proximity of these communities, we decided to go out to
5 500 feet. We actually notified a wider swab than what's
6 typically done.

7 Is that all?

8 AUDIENCE PARTICIPANT: (Jonathan Greenwood)
9 And you guys did say that the HOA is notified of this,
10 not just residents?

11 MS. HEIM: We did send letters to HOAs, as
12 well.

13 If that's all the comments, we can stick around
14 for a little bit. If there are any final questions you
15 may have, we have poster boards, if you want to stay and
16 look at them. And we do have copies of the document, if
17 you want to look at anything in more detail, as well as
18 the visual simulations that we pulled out. Those are
19 all in the document.

20 Thank you so much for attending and for your
21 comments.

22 (ENDING TIME: 7:30 p.m.)
23
24
25

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Peterson Reporting Video & Litigation

3 COMMENTS AND RESPONSES

3.3.4 Response to Public Meeting Comments: Jonathan Greenwood, Marco Torres, Raul Cardenas, and Derrick Roche

- C4-1 Permanent noise generated from the substation is addressed in Section 4.11: Noise. Noise generated from operation of the substation would be produced from transformers within the substation, which would be located approximately 233 feet from the nearest property. At this distance, noise from operation of the substation would be indistinguishable from ambient noise levels.
- Maintenance of the substation would require the use of heavy equipment, resulting in a substantial temporary increase in noise levels near the substation. Mitigation Measure Noise-1 requires SDG&E to respond to public complaints and to implement noise best management practices; however, mitigation would not reduce the effects of noise during maintenance activities to a less-than-significant level.
- C4-2 Refer to response to comment C1-2.
- C4-3 Health concerns regarding electric and magnetic fields (EMF) are discussed in the Project Description of the EIR, Section 2.10. The CPUC does not consider EMF to be an environmental issue in the context of CEQA because: (1) there is no agreement among scientists that EMF creates a potential health risk, and (2) CEQA does not define or adopt standards for defining any potential risk from EMF. As a result, the information provided in the EIR is presented for the benefit of the public and decision makers but is not considered within the context of CEQA.
- C4-4 The plants used for landscaping would be non-invasive plants, native to southern California and would therefore be relatively drought-tolerant. Plants would be irrigated for five years while the landscaping is established. The amount of water required for irrigation is specified in Table 2.8-1 of the Draft EIR and further discussed under Impact Utilities-4 in Section 4.15, Utilities and Service Systems. As discussed, the water required for irrigation would likely be recycled water from Otay Water District and would be within the capacity of Otay Water District to provide. The impact would be less than significant.
- C4-5 Refer to response to comment C3-1.
- C4-6 Refer to response to comment C3-1.
- C4-7 Table 6.3-1 in Chapter 6: Comparison of Alternatives of the EIR provides a comparative evaluation of the proposed project and each alternative. Alternative 2 is the environmentally superior alternative because it would avoid all impacts associated with construction, operation and maintenance of a new power line; Alternative 3 would create new impacts in other locations. The underground power line associated with Alternative 3 would increase the duration of noise impacts due to the increased duration of construction and impacts on transportation and traffic due to traffic and bicycle lane closures and possible bus stop closures or relocation.

3 COMMENTS AND RESPONSES

- C4-8 Environmental impacts from the proposed project or alternatives to the proposed project are discussed both in terms of impacts during construction and impacts during operation and maintenance as noted in Chapter 4: Evaluation of Environmental Impacts.
- C4-9 A 10- to 12-foot-tall masonry wall would enclose the proposed substation to prevent people from entering the site. Additionally, two 8-foot-tall chain-link gates would be located on the existing sewer access road extending to the substation from Hunte Parkway. The gates would be locked and monitored remotely to restrict access. Warning signs would be posted in accordance with SDG&E guidelines to deter people from entering the site.
- C4-10 The proposed 69-kV power line would cross SR-125, and thus require temporary closures, in two locations as shown on Figure 2.4-2 in the Draft EIR Project Description. One location would be immediately south of the exit to East H Street, and the other would be between the exits to Otay Lakes Road and Olympic Parkway.
- C4-11 Per the requirements specified in Mitigation Measure Traffic-1, temporary closure or partial closure of SR-125 would be limited to off-peak, non-daytime hours, from 10 PM to 5AM, and that signage be posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements. Detours will also be provided for SR-125 traffic.
- C4-12 The objectives of the proposed project are listed in Section 2.2 of the Draft EIR Project Description. The proposed project would meet the electric distribution capacity needs of the area, provide additional electrical reliability in the area, and reduce loading on substations in the area such that the electrical system could operate at optimum conditions.
- C4-13 Refer to response to comment C1-2.
- C4-14 SDG&E's application for a Permit to Construct the proposed project will be formally approved or denied by the CPUC as part of the legal proceedings for the application. If SDG&E proposed a substantial modification to the project, SDG&E would be required to undergo a second environmental review. Additionally, the CPUC monitors all construction activity to ensure that what is physically constructed is consistent with the approved project.
- C4-15 The impacts on recreational facilities, including parks and trails, are discussed in Section 4.13: Recreation. One park, the St. Germain Tennis Courts, would be temporarily closed during overhead cable stringing. Access to the parking lot would be closed to the public for safety for up to three days, which would not substantially disrupt recreational activities.

3 COMMENTS AND RESPONSES

The sewer access road and adjacent utility access roads south of Hunte Parkway are currently used by recreationists to access the California Riding and Hiking Trail located south of the proposed substation site. These roads will be temporarily closed during construction (18 to 24 months). Access to the California Riding and Hiking Trail would remain available via an existing trail along Hunte Parkway as well as through trail detours provided for trail closures, where feasible. Construction would not substantially disrupt recreational activities near the proposed project.

3 COMMENTS AND RESPONSES

3.4 REFERENCES

SDG&E (San Diego Gas and Electric Company). 1995. Subregional Natural Community Conservation Plan Implementing Agreement/CESA Memorandum of Understanding. December 18, 1995.

CDFW (California Department of Fish and Wildlife). 2015. Special Animals List. July 2015. <https://www.dfg.ca.gov/biogeodata/cnddb/pdfs/spanimals.pdf>

CDFW/USFWS (California Department of Fish and Wildlife/United States Fish and Wildlife Service). 2015. Take Authorization under the SDG&E Subregional Natural Community Conservation Plan. June 29, 2015.

USFWS (United States Fish and Wildlife Service). 2014. Federal Register (79 FR 72449 72497). <http://www.gpo.gov/fdsys/pkg/FR-2014-12-05/pdf/2014-28536.pdf>. December 5, 2014.