



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:

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,

A handwritten signature in black ink, reading "Therese O. Bradford". The signature is written in a cursive style with a large, looping initial "T".

Therese O. Bradford
Chief, South Coast Branch

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,

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.

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,



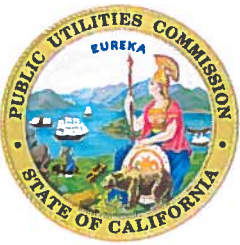
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SALT CREEK SUBSTATION PROJECT DRAFT EIR PUBLIC MEETING COMMENT

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.

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.



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.

Name: Mano 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 want the process and support the current project as applied for

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

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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.

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

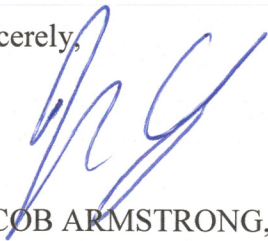
Ms. Connie Chen

June 17, 2015

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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



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:

- 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

Connie Chen
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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.

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.

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.

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.

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.

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

ranks Alternative 2 second, and the Proposed Project third.

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).

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.

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.

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.

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.

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

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).

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.

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.

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.

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

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.

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.

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.

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.

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:

- 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.
- 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.
- 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.
- 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.

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

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.

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.

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).

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).

- 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.
- 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.

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.

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.

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

regarding herbicide application.

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

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.

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.

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.

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.

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.

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

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.

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.

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.

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.

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.

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*.

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

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.

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.

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.

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

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.

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.

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

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.

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:

- (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.

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).

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.

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

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.

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.*

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:

- 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.

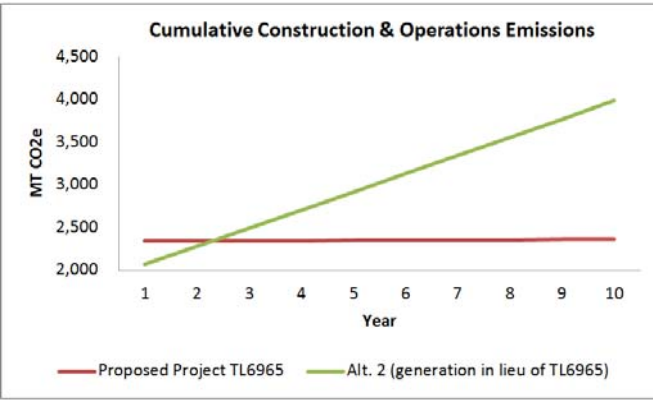
- The existing power network (TL 6910) provides only two 69kV sources with the loop-in of TL 6910 into the new 120MVA Salt Creek Substation. This creates violations of mandatory NERC/WECC/CAISO reliability criteria that can only be addressed in the short term by dispatching local generation. The amount 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.

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).

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						
1.	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)
2.	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.		
3.	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.
4.	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.

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment																																		
					Existing Language	Revised Language																																	
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.																																	
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</u> to ensure safety during conductor installation <u>over SR-125. Typical methods include short periods of stopping traffic, guard structures or mesh netting.</u>																																	
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																																							
8.	3.4.2 69/12 kV sub with no new line (gen)	3-11+	General Comment	<p>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 CO₂e) during the third year of operation (see chart below); the proposed TL6965 is a better option from a reduced emissions perspective.</p>  <table border="1"> <caption>Cumulative Construction & Operations Emissions</caption> <thead> <tr> <th>Year</th> <th>Proposed Project TL6965 (MT CO₂e)</th> <th>Alt. 2 (generation in lieu of TL6965) (MT CO₂e)</th> </tr> </thead> <tbody> <tr><td>1</td><td>2,300</td><td>2,000</td></tr> <tr><td>2</td><td>2,300</td><td>2,200</td></tr> <tr><td>3</td><td>2,300</td><td>2,400</td></tr> <tr><td>4</td><td>2,300</td><td>2,600</td></tr> <tr><td>5</td><td>2,300</td><td>2,800</td></tr> <tr><td>6</td><td>2,300</td><td>3,000</td></tr> <tr><td>7</td><td>2,300</td><td>3,200</td></tr> <tr><td>8</td><td>2,300</td><td>3,400</td></tr> <tr><td>9</td><td>2,300</td><td>3,600</td></tr> <tr><td>10</td><td>2,300</td><td>3,800</td></tr> </tbody> </table>	Year	Proposed Project TL6965 (MT CO ₂ e)	Alt. 2 (generation in lieu of TL6965) (MT CO ₂ e)	1	2,300	2,000	2	2,300	2,200	3	2,300	2,400	4	2,300	2,600	5	2,300	2,800	6	2,300	3,000	7	2,300	3,200	8	2,300	3,400	9	2,300	3,600	10	2,300	3,800	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>
Year	Proposed Project TL6965 (MT CO ₂ e)	Alt. 2 (generation in lieu of TL6965) (MT CO ₂ e)																																					
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				<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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				<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>		
9.	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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				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						
10.	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						
11.	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.
12.	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 earthmoving or excavation activities that create visible dust will shall be discontinued to limit <u>during period of high winds (i.e., greater than 25 mph) to prevent excessive amounts of</u> fugitive dust from leaving the project site, generation.
4.4 – Biological Resources						
13.	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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				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.
14.	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
15.	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.
16.	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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				<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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				<p>with the NCCP.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>21. This measure is from the NCCP Operational Protocols (Section 7.1.1,23). As stated in the DEIR (ES-2) "The</p>	<p>violations and compliance.</p> <p><i>Training</i></p> <p>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.</p> <p><i>Pre-activity Surveys</i></p> <p>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</p>	

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				<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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				<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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				<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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						<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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						<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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						<p>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.</p> <p>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).</p> <p>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.</p> <p>40. Maintenance work on access roads should not expand the existing road bed.</p> <p>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.</p> <p><i>Construction of new access roads shall comply with the following:</i></p> <p>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).</p> <p>43. Access roads will be made available to managers of</p>

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						<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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						<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>

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						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.
17.	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>
18.	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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				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 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 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-IPC) 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.
19.	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 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, with the goal of controlling populations before they start producing seeds. by the PCA with the goal of or eliminating production of seed or vegetative propagules.
20.	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 used for ground disturbing activities shall be washed clean (including wheels, undercarriages, and bumpers) before entering and again before leaving the substation site the first time they enter the project area. Further cleaning will not be required as long as the vehicles stay within

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				<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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						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.
21.	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.
22.	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.
23.	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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				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.
24.	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>
25.	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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				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.
26.	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.
27.	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.
28.	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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				<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>	
29.	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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					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 MMCRP. 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.
30.	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.
31.	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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				<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>
32.	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>		
33.	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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				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.
34.	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
35.	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 state and federally protected wetlands/waters. Such activities would could result in hydrologic modification and cause a substantial adverse effect on federally jurisdictional waters; this type of 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						
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.		
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).
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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39.	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.
40.	Staging Yards	4.5-21	3	Add information regarding CA-SDI-4897		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.
41.	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).
42.	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 appropriate local and state repositories; libraries, interested professionals.
43.	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 15 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required.
44.	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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45.	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						
46.	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						
47.	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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						the CPUC of the disposal method at least 30 days prior to construction.
48.	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						
49.	Hazards & Haz Mat’ls	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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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>voltage-current</u> 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.
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> .
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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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>
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>
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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				<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>	

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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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						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.
57.	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						
58.	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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					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.
59.	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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						<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>
60.	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.	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).	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>
61.	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.	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>
62.	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	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. 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	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. The drainage pattern at the substation site would be

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				<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). 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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				<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>
63.	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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						<p>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.</p> <p>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.</p>
4.10 – Land Use						
64.	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						
65.	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 (other than over-flight) 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.
66.	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 meet and confer

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				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						
67.	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						
68.	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.
69.	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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				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.		
70.	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						
71.	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						
72.	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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				15280 offers the following guidelines: A pipeline is considered protected from AC corrosion when CD is less than 30 A/m ² . CEN/TS 15280 goes further and says that in practice, the evaluation of AC corrosion likelihood is done on a broader basis: <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 		(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.
73.	4.15.5	4.15-12	Operation and Maintenance	The Draft EIR states that a significant impact would occur if current densities exceed n20 A/m ² . We request the significant threshold level be increased to 30 A/m ² in alignment with the European Standard CEN/TS 15280.	A significant impact would occur if current densities would exceed the threshold of 20 A/m ² as a result of the proposed project.	A significant impact would occur if current densities would exceed the threshold of 20 <u>30</u> A/m ² as a result of the proposed project.
74.	4.15.5	4.15-14	1 st paragraph under Mitigation Measures: Utilities-1 and Utilities-2	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.	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.	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 <u>35</u> calendar days prior to the impending interruption for residential outages and 10 calendar days prior to the impending interruption for commercial outages.
75.	4.15.-5	4.15-14	Mitigation Measure Utilities 3	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. 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.	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.	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.
6 – Comparison of Alternatives						
76.	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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					<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
77.	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 <u>Reduces noise impacts on sensitive receptors by eliminating the use of helicopters for power line stringing</u> 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

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					transmission corridor • Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines	transmission corridor • Reduces potential for hazards and hazardous materials impacts by avoiding construction of power pole foundations near fuel pipelines
78.	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>
79.	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)						
80.	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.
81.	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>
82.	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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					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><u>designated trails and public parks.</u> 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><u>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).</u></p> <p><u>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.</u></p>
83.	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.
84.	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. <u>Specifications for verdura retaining wall and masonry walls material color will be based on standard color palettes from the providers.</u>

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				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)
85.	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.
86.	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)
87.	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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				<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. 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>
88.	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>
89.	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>
90.	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> <ul style="list-style-type: none"> • All unpaved demolition and construction areas shall be wetted at least three times daily during

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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						<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>
91.	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>
92.	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>

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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93.	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						
94.	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>
95.	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.
96.	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>
97.	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.
98.	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.
99.	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>

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
					Existing Language	Revised Language
					<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>
100.	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.		
101.	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.
102.	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> .
103.	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.		
104.	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>
105.	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

Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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				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...."
106.	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.
107.	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.		
108.	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.
109.	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.		
110.	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.		
111.	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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Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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				two pipelines in the corridor.		
112.	Alt 2	4.6-32	6	Same as comment 118 above regarding page 4.6-31.		
113.	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.		
114.	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).		
115.	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.		
116.	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.
117.	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
118.	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
119.	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
120.	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.		
121.	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
122.	TL 6965	4.8-27		The HMBP does not apply to transportation or mobile sources, as implied in this section.		

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Comment #	Section Name	Page #	Paragraph or Table #	General Comment	Specific Comment	
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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).
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.
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>

FORENSIC ENTOMOLOGY SERVICES

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22 June 2015

Erin Riley, Senior Biologist
AECOM
401 West S Street, Suite 1200
San Diego, California 92101

**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

-  Rhamnus crocea
-  Proposed Substation Site
-  Transmission Line Corridor

Single plant
 Single plant
 Three plants
 Single plant



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

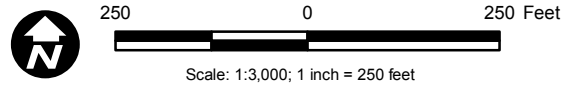


Figure 1
Rhamnus Crocea
Salt Creek



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

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

**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 Miguel 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

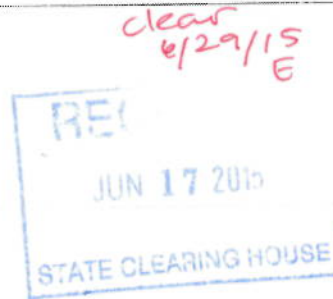
Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 11; Air Resources 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

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
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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.

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

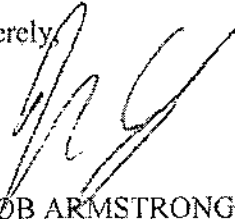
Ms. Connie Chen

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,

A handwritten signature in black ink, appearing to read 'JACOB ARMSTRONG', written over a faint, illegible background.

JACOB ARMSTRONG, Branch Chief
Development Review Branch