3.3 COMMUNITY GROUPS, PRIVATE COMPANIES, AND PRIVATE ORGANIZATIONS COMMENTS AND RESPONSES

This section includes comments received from community groups, private companies, and private organizations in letters and emails. Comments are delineated with responses to each comment.

Comment Letter B1

Sycamore-Peñasquitos 230-kV Transmission Line Project Comment Form

Comments must be postmarked no later than **Monday, Nov. 2, 2015** to be considered in the Final Environmental Impact Report. Comments may be submitted at the Draft EIR public meetings or postmarked and sent to the address below. Please note that your comments (including your personal identifying information) may be made publicly available at any time. If you would like to withhold your personal identifying information, please specify your request on this comment form.

Please Print Clearly. Attach additional sheets or use the back of this sheet if you need more space.

Date: 28 Sept 2015

B1-1 (1) Alternative 5 focuses on an underground option that would significantly affect Pomerado Rd in Scripps Ranch. Potentially major impact on existing traffic will exist throughout the construction phase. Pomerado Rd (a designated "Historic 395 Highway") is a 2 lane road that supports traffic from Scripps Ranch, Stonebridge, Poway, + Ramona every day.

B1-2 (2) Pomerado Rd is an identified / recognized Evacuation Route during major Wild fire events. 2003 and 2007 Wild Fire events made clear the life-saving importance of Pomerado Rd operating as an escape route for a large population of residents. It is critical that the CPUC give very serious consideration to the impact of construction on Pomerado / Scripps Ranch / Poway / Ramona area during major wildfire evacuations.

Name: SANDRA Wetzel-Smith ☐ **Prefer comment to be anonymous**

Organization/Affiliation (if applicable): Scripps Miramar Ranch Planning Group

Address: 10275 Pinecastle ST.
SAN DIEGO, CA 92131

Email Address: SandyWS@Yahoo.com

Please hand this form in or mail by **Nov. 2, 2015** to:
Billie Blanchard (CPUC Project Manager)
California Public Utilities Commission
c/o Panorama Environmental Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111
Email comments to **sycamorepenasquitos@panoramaenv.com** or fax comments to **650-373-1211.**

3.3.1 Response to Letter B1: Sandra Wetzel-Smith, Scripps Miramar Ranch Planning

B1-1 Alternative 5 impacts on traffic, including impacts during construction, are analyzed in Section 4.7.13.2 of the Draft EIR. The impact on traffic flow on Pomerado Road is discussed in Impact Traffic-1 and Impact Traffic-5.

B1-2 The impact of Alternative 5 road closures on emergency access is considered in Section 4.7.13.2, Impact Traffic-6 of the Draft EIR. The impact of road closures on emergency evacuation is discussed in Section 4.11.8, Impact Hazards-7 of the Draft EIR. As described in the Draft EIR, road closures would be cancelled due to a nearby fire or other emergency. Additional language has been added to Mitigation Measure Traffic-6 to clarify road closure requirements during an evacuation in response to this comment. See General Response GR-12 for further information regarding impacts on emergency evacuation and the additions to Mitigation Measure Traffic-6.

Comment Letter B2

Sycamore-Peñasquitos 230-kV Transmission Line Project Comment Form

Comments must be postmarked no later than **Monday, Nov. 2, 2015** to be considered in the Final Environmental Impact Report. Comments may be submitted at the Draft EIR public meetings or postmarked and sent to the address below. Please note that your comments (including your personal identifying information) may be made publicly available at any time. If you would like to withhold your personal identifying information, please specify your request on this comment form.

Please Print Clearly. Attach additional sheets or use the back of this sheet if you need more space.

Date: Sept 28, 2015

B2-1 1. The Scripps Ranch Planning Group would appreciate a presentation at our Regular meeting on October 1, 2015 or November 5, 2015. If not on October 1, then we would like an EXTENSION of the comment period to Nov 13, 2015

B2-2 2. Can this project be combined with the SDG&E proposed gas TRANSMISSION LINE also proposed for Pomerado Rd in Scripps Ranch — i.e can one project preclude the other?

B2-3 3. IF Pomerado Rd is disturbed for either Project, we want (A) Reclaimed water (purple pipe) extended from Willow Creek Rd EAST to Stonebridge Parkway

Name: WALLACE H. WULFECK ☐ **Prefer comment to be anonymous**

Organization/Affiliation (if applicable): Scripps Miramar Ranch Planning Group

Address: 12517 FAIRBROOK Rd,
SAN DIEGO, CA 92131-2234

Email Address: WHW@SAN.RR.COM

Please hand this form in or mail by **Nov. 2, 2015** to:
Billie Blanchard (CPUC Project Manager)
California Public Utilities Commission
c/o Panorama Environmental Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111
Email comments to **sycamorepenasquitos@panoramaenv.com** or fax comments to **650-373-1211.**

B2-3 and (B) a class I Bicycle Path adjacent to Pomerado from I-15 east to stonebridge

3.3.2 Response to Letter B2: Wallace Wulfeck, Scripps Miramar Ranch Planning

B2-1 The comment period for the Draft EIR was 45 days from September 17, 2015 to November 2, 2015, consistent with CEQA requirements. Three informational workshops were held for the public during the comment period. A representative of the CPUC also attended a Scripps-Miramar Ranch Planning Group committee meeting on October 29, 2015. The comment deadline for the Scripps-Miramar Ranch Planning Group was extended by two weeks until November 16, 2015, as requested in this comment.

B2-2 The Proposed Project cannot be combined with SDG&E's Pipeline Safety and Reliability Project (PSRP). SDG&E filed a separate application with the CPUC for the PSRP. The PSRP is a separate independent action with unrelated objectives to the Proposed Project. Furthermore, the PSRP application was filed with the CPUC in September 2015 well after issuance of the Proposed Project NOP on August 11, 2014 and the publication of the Draft EIR for the Sycamore-Peñasquitos 230-kV Transmission Line Project on September 17, 2015. For this reason, the PSRP was not included in the cumulative impacts analysis.

Regardless, the PSRP is in the preliminary design stages and the CEQA environmental review for that project is just beginning; therefore, the PSRP components and alignment the CPUC ultimately approves are not known at this time. SDG&E confirmed at the October 29th, 2015 Scripps-Miramar Ranch Planning Group committee meeting and in comments on the Draft EIR (SDG&E 2015a) that it would be feasible to construct both the future PSRP and Alternative 5 in Pomerado Road.

B2-3 Comment noted. Adding a reclaimed water pipeline is unrelated to the impacts of the Proposed Project or project alternatives. Potential impacts from construction and operation of the Alternative 5 include dig-ins during construction and corrosion from induced current on metallic pipelines during operation. The mitigation in Section 4.17.2.2 of the Draft EIR requires pre-construction notification to utilities, potholing, and cathodic protection to avoid impacts of the Proposed Project on water pipelines. The reclaimed water pipeline would not mitigate an impact caused by the Proposed Project or project alternatives and is therefore beyond the scope of the analysis or mitigation required or permitted under CEQA[4].

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[4] Pursuant to CEQA Guidelines Section 15126.4 (4), mitigation measures must be consistent with all applicable constitutional requirements, including the following:
(A) There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest (*Nollan v. California Coastal Commission* (1987)); and
(B) The mitigation measure must be "roughly proportional" to the impacts of the project (*Dolan v. City of Tigard* (1994)). Where the mitigation measure is an ad hoc exaction, it must be "roughly proportional" to the impacts of the project (*Ehrlich v. City of Culver City* (1996)).

Comment Letter B3

California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O. Box 121390
San Diego CA 92112-1390
conservation@cnpssd.org | www.cnpssd.org

October 24, 2015

California Public Utilities Commission
c/o Panorama Environmental, Inc.
1 Embarcadero Center, Suite 740
San Francisco, CA 94111
sycamorepenasquitos@panoramaenv.com

RE: San Diego Gas & Electric Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project

Dear Sir or Madam:

We appreciate the opportunity to comment on the San Diego Gas & Electric Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (Project). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and preserve it for future generations. CNPSSD promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices.

We have a comment and additional information. Of the five alternatives presented, we advocate Alternative 5—The Environmentally Superior Alternative. While we acknowledge that this will cost more in the short term and be more inconvenient, these costs are relative. The preferred Alternative (#1) may be cheaper, but it exposes the power line to more risk, for it crosses areas that may burn fiercely, such as the old-growth chaparral on Del Mar Mesa. While these areas are (hopefully) unlikely to burn, if they do, the line will have to be shut down, likely causing blackouts and thereby exacerbating the emergency. The 2011 blackout demonstrated that this part of San Diego does not function well without electricity, and trying to evacuate thousands of people with the power out will be a serious problem.

B3-1

In environmental terms, Del Mar Mesa (under Segment C of the Preferred Project Alternative) is the last major stand of old growth chaparral dominated by Nuttall's scrub oak (*Quercus dumosa,* a CRPR list 1B sensitive species), and it contains some species not found elsewhere in California, although these are outside the Project area. While we do not assume that things will go wrong while the Project is constructed, if an accident occurs during construction or during operations in this area, it will have major consequences, from destroying old growth and taking endangered species to potentially threatening nearby homes if a fire starts.

The Preferred Option is cheap but risky, and if the risks materialize, they will be more expensive than the Environmentally Superior Alternative 5. That is why we advocate for the latter.

Dedicated to the preservation of California native flora

B3-2 Second, we agree with purported advice from the wildlife agencies, that, if the Preferred Project Alternative is chosen, that construction equipment not drive on the top of Del Mar Mesa between (32.944139°, -117.167604°) and (32.951477°, -117.168836°). Given the plethora of sensitive species, it would be much simpler to drive in on either side and use a helicopter to carry lines between posts. Also, unless the roads are totally dry and hard, the road is clay. The vernal pools in the road are mostly due to trucks making ruts, and pools forming subsequently. The area does not need more such activity.

Last, since we have extensive botanical knowledge of Del Mar Mesa, we would like to correct and add some information.

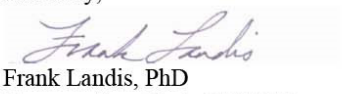
B3-3
- With one known exception that is not in the Project area, all the scrub oaks on Del Mar Mesa (Segment C) are Nuttall's scrub oaks, not hybrids or other species. Fred Roberts, who literally wrote the book (*Illustrated Guide to the Oaks of the Southern California Floristic Province*) has botanized the area. We examined over 100 oaks in the area, and found one putative hybrid. The oaks in the area are unusually large for Nuttall's scrub oaks, but it is because they are unusually old and in ideal habitat. We are happy to lead surveyors to the one hybrid for confirmation. In general, it is simpler to treat all scrub oaks found on Del Mar Mesa as Nuttall's scrub oak, which is a list 1B sensitive species.

B3-4
- Jon Rebman, head of the herbarium at the San Diego Natural History Museum (SDNHM) has also botanized the area, and he found two sensitive species within the Project area for Segment C that are not listed in the EIR. The specimens are deposited at SDNHM, and data can be found online. These are:
    - California groundsel (*Senecio aphanactis*). SDNHM specimen 231565 (Lat: 32.93969 °, Long: -117.17338 °), list 1B, and
    - Knotweed spineflower (*Chorizanthe polygonoides* var. *longispina*). SDNHM specimen 231704 ((Lat: 32.94412 °, Long: -117.16659 °), list 1B

  Of these, the knotweed spineflower is most problematic, since it grows in the road around a road pool between the two points given above, and would likely be run over by work trucks. The California groundsel would only be endangered by something going wrong, but its location needs to be known and avoided by workers.

In sum, we are happy to provide this additional information to the Project and to strongly advocate for the Environmentally Superior Alternative 5. Thank you for taking our comments. If there are any questions, please contact Frank Landis at conservation@cnpssd.org. Please keep us informed of future developments with this project.

Sincerely,



Frank Landis, PhD
Conservation Chair, CNPSSD

3.3.3 Response to Letter B3: Frank Landis, California Native Plant Society San Diego

B3-1 Comment noted. The impact from risk of fire ignition and spread due to Proposed Project construction activities has been analyzed in Section 4.12: Fire and Fuels Management and would be less than significant with mitigation as described in Section 4.12.7, Impact Fires-1 of the Draft EIR. Applicable mitigation measures require the finalized Fire Prevention Plan (Mitigation Measure Fire-1), coordination with fire protection and emergency service providers (Mitigation Measure Fire-2), available water trucks or tanks during construction (Mitigation Measure Fire-3), and adequate conductor clearances (Mitigation Measure Fire-4). The presence of Nuttal's scrub oak along Segment C is noted under Table 4.1-3 and impacts on Nuttal's scrub oak are discussed in Section 4.1: Biological Resources, Impact Bio-1 of the Draft EIR. Alternative 5 would reduce impacts on biological resources including Nuttal's scrub oak and would reduce potential risk of fire ignition by reducing construction in wildlands.

B3-2 As analyzed under Section 4.1.8, Impact Bio-2 of the Draft EIR, the potentially significant construction impact on Del Mar Mesa vernal pools that support sensitive species, such as special-status invertebrates and San Diego button-celery, would be reduced by prohibiting construction access on Del Mar Mesa between poles E9 and E12, as required under Mitigation Measure Biology-4. This restriction is consistent with the comment.

B3-3 In response to this comment, the CPUC conducted additional research into the presence of Nuttall's scrub oaks or hybrid species.

SDG&E Surveys for Nuttall's Scrub Oaks

During survey of special-status plant species, SDG&E botanists found some scrub oak species, which they believed to be a hybrid of a Nuttall's scrub oak and other oak (*Quercus*) species (Busby 2014c). To determine whether the scrub oak trees were Nuttall's scrub oaks or hybrid species, the botanists collected samples of the scrub oaks and provided them to Mr. Jon Rebman, Curator of Plants at the San Diego Natural History Museum, for identification. Mr. Rebman analyzed the samples and provided guidance to the botanists on what should be considered Nuttall's scrub oak and what should be considered a hybrid. Some oak species were identified as hybrid species and were not included in the special-status survey report (Busby 2014c).

Clarification on Presence of Nuttall's Scrub Oaks

On January 5, 2016, the CPUC requested input from Mr. Rebman on the classification procedure for Nuttall's scrub oak (see Attachment 2: Agency Correspondences to the Final EIR). Mr. Rebman acknowledged that some of the species identified as hybrid oaks in Segment C could in fact be Nuttall's scrub oak.

CPUC Surveys for Nuttall's Scrub Oaks

To verify the number of Nuttall's scrub oak or other scrub oak species that could be impacted by the Proposed Project, the CPUC's botanist conducted a field review of Proposed Project areas in Del Mar Mesa Preserve (Segment C) in January and February of 2016.

Methodology. The field review for Nuttall's scrub oak was conducted over 7 days, including January 22, 27, 29 and February 1, 8, 13, and 14, 2016, and included surveys of work areas in Segment C and a buffer of 10 feet around work areas for the presence of Nuttall's scrub oak and other scrub oak species. During the last two days of the field review, the buffer was reduced to 2 feet the Proposed Project would not impact any individuals outside of the 2-foot buffer consistent with the revised access road impact assumptions (see General Response GR-15).

A summary of morphological characteristics was developed through review of two separate taxonomic treatments, online resources, and upon consultation with other CPUC botanists (Helix 2016). The hairs, or trichomes, on the underside of the leaves are the most reliable characteristic for separating Nuttall's scrub oak from other taxa. Initially, the trichomes on every scrub oak were examined for identification; however, after several days of field work this became unnecessary because all plants that had the typical characteristics of a Nuttall's scrub oak were determined to be Nuttall's scrub oak and not other scrub oak species upon closer scrutiny. A typical Nuttall's scrub oak is a dense shrub that is less than 2 meters tall and has leaves that are less than 2.5 centimeters with wavy, spine-toothed margins. Plants that did not fit the typical description (i.e. larger tree-like individuals) were scrutinized for leaf hairs, size, shape, and growth habit (tree vs. shrub).

Results. A total of 608 Nuttall's scrub oaks and 163 other scrub oaks mapped within the area surveyed along Segment C. Refer to Appendix G: Biological Resources Support Information of the Draft EIR for the survey results with a map showing the locations of Nuttall's scrub oak species along and within Segment C work areas.

Impacts

The number of Nuttall's scrub oak that would be impacted by construction in Segment C of the Proposed Project is summarized in Table 3.3-1.

Table 3.3-1 Nuttall's Scrub Oaks within Proposed Project Work Areas

Impact Type	Number of Nuttal's Scrub Oak
Access Road Improvements (2-foot buffer from existing access roads)	57
Existing Access Roads	87
Permanent Structure Pad	14
Temporary Work Area	239
TOTAL	**397**

The impact to Nuttall's scrub oak was revised in Table 4.1-8 of the Draft EIR are as follows:

Table 4.1-8 Direct and Permanent Impacts to Individual Special-status Plants from the Proposed Project Area

Species	Status[1]	Estimated Individuals Affected by the Proposed Project					NCCP Covered Species?	MSCP Covered Species	Total Estimated Affected Individuals
		Seg. A	Seg. B	Seg. C	Seg. D	Other Work Areas[2]			
Nuttall's scrub oak	1B.1	38	–	~~111~~ 397	12	–	No	No	~~161~~ 447

Consistent with the analysis in the Draft EIR, the impact on Nuttall's scrub oak would be significant. These results do not increase the severity of impacts from those presented in the Draft EIR. More individual Nuttall's scrub oak were surveyed in and adjacent to the Proposed Project Segment C during surveys performed by the CPUC; however, the higher density of Nuttall's scrub oak and lower density of other scrub oak species in that area are reflective of higher population numbers of Nuttall's scrub oak in the Del Mar Mesa Preserve. SDG&E would implement APM BIO-1 as part of the Proposed Project, which requires that SDG&E avoid impacts to special-status species to the maximum extent possible by installing fencing or flagging. APM BIO-1 also requires compensation in the form of off-site land preservation, plant salvage, or plant transplantation in the case of unavoidable impacts. Mitigation Measure Biology-2 requires staking and flagging of Nuttall's scrub oak for avoidance where feasible. Where avoidance is not feasible, the impact on Nuttall's scrub oak would be quantified and the affected individuals would either be salvaged and relocated or SDG&E would provide off-site mitigation through preservation of lands with comparable special-status plant species. Mitigation Measure Biology-2 was designed to provide compensation that is proportionate to the level of impact to special-status plants. The measure also prioritizes avoidance and minimization over mitigation to reduce impacts to Nuttall's scrub oak. Impacts on Nuttall's scrub oak would be less than significant with mitigation.

B3-4 California groundsel (*Senecio aphanactis*) is discussed under an alternate common name, "Chaparral ragwort". Chaparral ragwort is identified as having a high potential[5] to occur within Segments C and D but was not observed within the BSA.

[5] Species with known recent (i.e., last 25 years) recorded occurrences/populations in the BSA or nearby and for which highly suitable habitat occurs within or adjacent to the BSA. Suitable habitat includes all necessary elements to support the species (e.g., vegetation composition and structure)

Knotweed spineflower (*Chorizanthe polygonoides* var. *longispina*) is discussed under an alternate common name, "long-spined spineflower". Long-spined spineflower is identified as having a high potential to occur within Segments C and D and was identified within the project area within Segment C.

Full analysis and discussion of mitigation for direct impacts on long-spined spineflower and special-status plants with a high potential to occur in the BSA, including chaparral ragwort, is provided in Section 4.1.8, Impact Bio-1 of the Draft EIR. Mitigation Measure Biology-4 describes measures to avoid, minimize and mitigate impacts on road pools that provide suitable habitat for long-spined spineflower. See response to comment B3-3 for a discussion of areas that will be off limits to construction vehicles.

Comment Letter B4

California ISO

California Independent System Operator Corporation

November 2, 2015

California Public Utilities Commission
c/o Panorama Environmental, Inc.
1 Embarcadero Center, Suite 740
San Francisco, CA 94111
sycamorepenasquitos@panoramaenv.com

RE: CAISO Comments on the Sycamore-Penasquitos 230 Kilovolt Transmission Line Project Draft Environmental Impact Report

B4-1

The California Independent System Operator Corporation (CAISO) appreciates the opportunity to submit comments regarding the Draft Environmental Impact Report (DEIR) for the Sycamore-Penasquitos 230 Kilovolt Transmission Line Project (Project). The CAISO has reviewed the DEIR and the alternatives presented therein. Based on this review, the CAISO believes that the alternatives presented are electrically sufficient to address the CAISO-identified needs for the Project.

The CAISO understands that the alternatives, including the environmentally superior alternative, raise cost and schedule concerns that will be addressed in the Commission's review of the Project and alternatives in the certificate of public convenience and necessity process.

Respectfully,

/s/ Delphine Hou
Delphine Hou
External Affairs Manager

www.caiso.com | 250 Outcropping Way, Folsom, CA 95630 | 916.351.4400

3.3.4 Response to Letter B4: Delphine Hou, California Independent System Operator Corporation

B4-1 Comment noted. Thank you for your review of the Draft EIR.

San Diego Unified
SCHOOL DISTRICT

GARY STANFORD
Director Project Management
Facilities Planning and Construction
858.637.6280
gstanford1@sandi.net

Comment Letter B5

October 30, 2015

California Public Utilities Commission
c/o Panorama Environmental, Inc.
1 Embarcadero Center, Suite 740
San Francisco, CA 94111

VIA FAX (650-373-1211) & E-MAIL (sycamorepenasquitos@panoramaenv.com)

Re: SDG&E Sycamore-Penasquitos 230-Kilovolt Transmission Line Project
(A-14-04-011) – COMMENTS ON DRAFT EIR

Dear Commissioners and Staff:

The San Diego Unified School District (SDUSD) appreciates the opportunity to comment on the draft environmental impact report (DEIR) for the above-referenced project. This project involves installation and expansion of significant utilities infrastructure in urbanized areas served by SDUSD. Our concern is with the potential impacts of the project upon existing and/or planned facilities of SDUSD in the vicinity of the project route.

We have identified three SDUSD school sites in close proximity to Segment A of the project:

- Dingeman Elementary School, located at 11840 Scripps Creek Dr. (92131), approximately 560 feet south of the centerline of the project alignment;
- E.B. Scripps (K-5) School, located at 11778 Cypress Canyon Rd. (92131), approximately 945 feet south of the center line of the project alignment; and
- Innovations Academy Charter School (K-8) located at 10380 Spring Canyon Rd (92131), approximately 330 feet south of the center line of the project alignment.

B5-1

It is important that the DEIR fully recognize the special nature of activities conducted at these locations and their unusual sensitivity to external disruptions, and that appropriate mitigation measures be employed to eliminate or minimize such disruptive effects.

We request that the California Public Utilities Commission, in reviewing the DEIR, and particularly the Mitigation Monitoring and Reporting Plan (MMRP), consider the following matters of concern to SDUSD:

1. Traffic.

B5-2

The DEIR indicates that work at the project site and at the staging yards may occur at any and all times between 7:00 am and 7:00 pm. Movement of equipment on and off the project site will occur at the beginning and end of each work day. Also, street closures and other temporary traffic control measures are planned for times when certain project operations, such as line stringing, are being conducted.

FACILITIES PLANNING & CONSTRUCTION 4860 Ruffner Street San Diego, CA 92111 858.637.6280

California Public Utilities Commission
c/o Panorama Environmental, Inc.
October 30, 2015

The regular hours of project activity thus include the two time periods during which our school sites experience particularly heavy vehicular and pedestrian traffic – just prior to the start of school in the morning and just after the end of school in the afternoon. During those time periods, streets and sidewalks in the vicinity of the schools are in substantially more intensive use than during the rest of the day.

B5-2 The MMRP provides for preparation and implementation of a Construction Transportation Management Plan (CTMP), but makes no reference to the specific traffic impacts upon school sites (other than to indicate, in the Noise component, that construction traffic should be routed away from schools when feasible). The Transportation and Traffic component of the MMRP should be revised to require: (i) that the CTMP include specific requirements for construction-related traffic to avoid streets and intersections in the proximity of school sites during recurring high-traffic periods; and (ii) that no temporary street or sidewalk closures occur in the proximity of school sites during recurring high-traffic periods.

2. Emergency Services.

B5-3 Due to the high concentration of young children, schools have a particularly great need for reliable access to emergency services. Police, fire and medical facilities all are located within fairly close proximity to the SDUSD school sites, and it is important to SDUSD and the community at large that access to those facilities not be impaired during school hours. Given the locations of the public service facilities relative to the school sites, such interruption is possible.

The DEIR references this issue and identifies the public service facilities in question, but the MMRP makes no provision for protecting access. The MMRP should be revised to include a requirement that any interruptions to vehicular and pedestrian traffic in the vicinity of the SDUSD school sites be managed in such a way as to not impact direct, convenient access to the nearest police, fire and medical facilities.

3. Noise.

B5-4 Noise has particularly disruptive effects upon the ongoing activities of school facilities. The DEIR discusses impacts from vehicular movement, trenching, drilling, blasting and other noise-generating activity in connection with project construction, substantially in excess of ambient noise levels. It particularly notes that helicopter activity, in connection with delivery of project components and stringing of power lines, may occur at any time during working hours. Unlike traffic impacts, these noise impacts may affect our facilities and their occupants throughout the school day. The DEIR identifies several noise-sensitive receptors (including one private school facility) located within 1,000 feet of Segment A of the project, but makes no mention of any of SDUSD's school sites.

SDUSD's facilities all should be added to the list of noise-sensitive receptors in Table 4.8-2. The Noise component of the MMRP should be revised to mandate: (i) stricter noise attenuation for project work in the vicinity of school sites; and (ii) a larger separation between helicopter operation areas and school sites.

4. Electro-Magnetic Fields.

B5-5 The DEIR acknowledges in the Project Description that the project will generate an electro-magnetic field (EMF). However, the DEIR asserts that no analysis of this phenomenon is required under the California Environmental Quality Act, due to the lack of agreement as to any health impacts of an EMF and the lack of standards for defining any potential risk.

California Public Utilities Commission
c/o Panorama Environmental, Inc.
October 30, 2015

B5-5 At the same time, the DEIR acknowledges that the Standards for School Site Selection promulgated by the California Department of Education include a requirement that new school sites be located specified minimum distances from power line easements. In the case of a 230 kV line, such as the one proposed here, that minimum separation is 150 feet. Inasmuch as the easement width in Segment A of the project is 200 feet, that standard may preclude expansion of any of the three SDUSD sites described above, in light of their current relatively close proximity to the project alignment.

B5-6 While not disputing the current state of scientific knowledge regarding the potential impacts of EMFs (or lack thereof), SDUSD requests that consideration be given to a project alternative which would realign segments of the project so as to create a greater separation from the three SDUSD school sites.

We will be pleased to discuss further any of the issues raised in this comment letter. Inquiries should be directed to:

Kathryn Ferrell
San Diego Unified School District
Facilities Planning and Construction
4860 Ruffner Street
San Diego, CA 92111
Tel. (858) 627-7298.

Sincerely,

Gary Stanford
Director Project Management

GS/KF

San Diego Unified 3 of 3

3.3.5 Response to Letter B5: Gary Stanford, San Diego Unified School District

B5-1 The three San Diego Unified School District (SDUSD) schools identified were considered and analyzed in the Draft EIR. The SDUSD schools are listed in Section 4.11: Hazards and Hazardous Materials, Table 4.11-2. In addition, Thurgood Marshall Middle School, an SDUSD school, is located within 0.25 mile of the Alternative 5 alignment as listed in Table 4.11-12.

B5-2 SDG&E has proposed to construct the Proposed Project between 7 AM and 7 PM as noted. The timing and duration of lane closures are restricted as defined in Mitigation Measure Traffic-6. Mitigation Measure Traffic-6 restricts lane closures to off-peak period outside the timeframes of 6 AM to 9:30 AM and 3:30 PM to 6:30 PM. The mitigation measure also requires steel plates to provide access to driveways. Mitigation Measure Traffic-7 requires temporary pedestrian access through detours or safe areas. There would be no temporary sidewalk closures as a result of Mitigation Measure Traffic-7. Additional language has been added to Mitigation Measure Traffic-6 requiring that SDG&E coordinate with schools prior to any lane or road closure within 1,000 feet of school property. See General Response GR-12 for revisions to Mitigation Measure Traffic-6 to require coordination with schools.

B5-3 It is recognized that schools have a particularly high need for emergency access. Emergency access on all roads including access to school facilities is addressed in Section 4.7.8, Impact Traffic-5 of the Draft EIR. Mitigation Measure Traffic-1 requires use of temporary detours to redirect traffic during any temporary lane or road closures. Mitigation Measure Traffic-6 requires that SDG&E provide access to driveways through the use of steel plates over temporary trenches. Mitigation Measure Traffic-7 requires temporary pedestrian access through detours or safe areas where there are temporary sidewalk closures. Mitigation Measure Traffic-8 requires notification of emergency personnel at least one week prior to lane or road closures. These mitigation measures would ensure that emergency personnel have uninterrupted access to schools.

B5-4 The Draft EIR considered the location of the nearest school facility (sensitive receptor) to each segment of the Proposed Project as a basis for determining construction-related noise impacts. The nearest school facility in Segment A is Mount Carmel High School located 86 feet from a work area. Using the nearest school to analyze impacts provides a conservative estimate of the maximum noise level that could be experienced at a school (e.g., the noise at SDUSD schools would be less than the noise at Mount Carmel High School because noise levels attenuate with distance). All sensitive receptors within 1,000 feet of the Proposed Project have been added to Table 4.8-2 to reflect this comment. The distances are measured from the property line of the school to the nearest work area. The revisions to Table 4.8-2 are shown below:

Table 4.8-2 Noise-Sensitive Receptors within 1,000 Feet of the Proposed Project

Receptor Type[1]	Distance to Nearest Work Area (feet)	Project Feature[2]
Transmission Line Segment A		
Residence	37	Work Area P12
Butterfly Mini Park	200	Work Area R16
Dingeman Elementary School	151	Work Area R19
Ellen Browning Scripps Elementary School	733	Work Area R15
Innovations Academy Public Charter School	200	Work Area R20
Rancho Peñasquitos KinderCare	522	Work Area R29
U.S. Arts Education Center	735	Work Area R29
Taiwanese Lutheran Church of San Diego	555	Work Area R34
Mount Carmel High School – Mount Carmel Center (Palomar College) complex	~~86~~ 310	Work Area P34
Carmel Mountain Church	504	Work Area R29
Mount Carmel Church of the Nazarene	226	Work Area R35
Black Mountain Open Space Park	70.5 (directly under lines)	Transmission line directly overhead
Black Mountain Ranch Community Park	70.5 (directly under lines)	Transmission line directly overhead
Cypress Canyon Neighborhood Park	850	Work Area P11
Hilltop Community Park	130	Work Area P35
Spring Canyon Neighborhood Park	230	Work Area R20
Sycamore Canyon Park	70.5 (directly under lines)	Transmission line directly overhead
MD Today Urgent Care	442	Work Area R23
The Sharp Rees-Stealy Scripps Ranch Medical Center	56	Work Area R24
Transmission Line Segment B		
Black Mountain Ranch Community Park	70.5 (directly under lines)	Transmission line directly overhead
Black Mountain Open Space Park	70.5 (directly under lines)	Transmission line directly overhead
Residence	35	Temporary Underground Work Area

Receptor Type[1]	Distance to Nearest Work Area (feet)	Project Feature[2]
The Kids Bay Learning Center	111	Temporary Underground Work Area
Church of Jesus Christ of Latter-day Saints	33	Temporary Underground Work Area
Torrey Del Mar Neighborhood Park	775	Temporary Underground Work Area
Transmission Line Segment C[3]		
Residence	106	Work Area P43
The Kids Bay Learning Center	990	Work Area P42
Del Mar Mesa Preserve	70.5 (directly under lines)	Transmission line directly overhead
Transmission Line Segment D[4]		
Residence	39	Work Area P43
Los Peñasquitos Canyon Preserve	70.5 (directly under lines)	Transmission line directly overhead
Torrey Hills Dog Park	200	Work Area P58
Staging Yards		
Residence	760	Stonebridge Staging Yard
Residence	570	Carmel Valley Road Staging Yard
Church of Jesus Christ of Latter-day Saints	150	Carmel Valley Road Staging Yard
Residence	770	Camino Del Sur Staging Yard
~~The~~ Church of Jesus Christ of Latter-day Saints	~~413~~ 240	Camino Del Sur Staging Yard
Residence	800	SR-56 Staging Yard
Canyon Crest Academy	25[5]	SR-56 Staging Yard
Residence	10	Evergreen Nursery Staging Yard
The Kids Bay Learning Center	685	Evergreen Nursery Staging Yard
Rancho Peñasquitos Community	375	Chicarita Substation
Taiwanese Lutheran Church of San Diego	85	Chicarita Substation
Mission Valley Community	435	Mission Substation

Receptor Type[1]	Distance to Nearest Work Area (feet)	Project Feature[2]
Residence	335	Peñasquitos Substation
Torrey Hills Neighborhood Park	420	Peñasquitos Substation
San Luis Rey Community	580	San Luis Rey Substation
Mission—San Luis Rey Phase Transposition		
Residence	~~610~~ 600	South Work Area
Kaiser Permanente Garfield Specialty Center	260	South Work Area
Scripps Proton Therapy Center	60	North Work Area
Bridgepoint Education	50	South Work Area

Notes:

1 There are no sensitive receptors within 1,000 feet of the Encina Hub.

2 Project features shown in Appendix A mapbook.

3 Additional residences may be constructed and occupied near Segment C prior to project completion. There are no ~~schools or~~ churches within 1,000 feet of Segment C.

4 There are no schools or churches within 1,000 feet of Segment D.

5 Distance is to the campus boundary at the ~~baseball field~~ parking lot. The distance to the nearest instructional or administration building is over 1,000 feet.

Noise mitigation measures were designed to address the impact of helicopters working in close proximity to schools. Mitigation Measure Noise-6 requires that SDG&E notify schools prior to helicopter activity in the vicinity of the school. The measure also restricts any helicopter activity within 300 feet of a school property at times when classes are in session. This restriction would reduce the impact of helicopter activity on schools by prohibiting helicopters from working in proximity to schools while classes are in session.

Mitigation Measure Noise-2 requires that SDG&E use noise suppression techniques to reduce noise levels. The mitigation measure is revised to include the use of sound walls or acoustic blankets when construction activities are conducted within 300 feet of a school. Revisions to Mitigation Measure Noise-2 are shown in General Response GR-9.

B5-5 SDUSD schools located in proximity to Segment A are noted in Table 4.8-2. The Segment A transmission ROW currently includes one 69-kV power line, one 138-kV power line, and one 230-kV transmission line. The proposed 230-kV transmission line would be located approximately 65 feet west of the existing 230-kV transmission line and 20 feet east of the existing 138-kV power line. As noted, the new transmission line may preclude expansion of SDUSD school facilities closer to

SDG&E's ROW; however, there are existing power and transmission lines in this ROW that would currently restrict school expansion closer to SDG&E's ROW.

B5-6 Comment noted regarding a request to generally consider an alternative that would increase separation between the transmission line and schools. See response to comment B5-5. Alternative 5, the Environmentally Superior Alternative, would increase the separation between SDUSD schools and the proposed 230-kV transmission line compared to the Proposed Project. The distance between the Alternative 5 underground alignment and the nearest SDUSD school is approximately 1 mile. As discussed under Section 2.6.3.2 of the Draft EIR, EMF can be reduced by increasing distance to the line and installing the line underground. The CPUC does not consider EMF to be an environmental issue in the context of CEQA because: a) there is no agreement among scientists that EMF creates a potential health risk, and b) CEQA does not define or adopt standards for defining any potential risk from EMF. Alternatives were not developed to reduce EMF because EMF is not a significant impact within the context of CEQA; consistent with CEQA Guidelines Section 15126.6, alternatives were developed to reduce significant impacts of the Proposed Project.

Comment Letter B6

Comments on Draft Environmental Impact report for the San Diego Gas & Electric Sycamore-Peñasquitos 230-kV Transmission Line Project (Application No. 14-04-011)

Submitted by	Company	Submitted to	Date Submitted
Joyce Kinnear: 408-615-6656, City of Santa Clara Electric Department, 1500 Warburton Avenue, Santa Clara, CA 95050.	*City of Santa Clara, dba Silicon Valley Power (SVP)*	*CPUC c/o Panorama Environmental, Inc.* *Sycamorepenasquitos@panoramaenv.com*	*November 2, 2015*

Silicon Valley Power (SVP) appreciates the opportunity to provide comments to the California Public Utilities Commission (CPUC) on the scope of the Draft Environmental Impact Report (DEIR) for the San Diego Gas and Electric Sycamore- Peñasquitos Transmission (Proposed Project).

CPUC's Basic Project Objectives

In Chapter 3, the DEIR identifies three CPUC basic project objectives as follows:

1. Maintain long-term grid reliability in the absence of San Onofre Nuclear Generating System (SONGS) generation
2. Deliver energy more efficiently to the load center in San Diego
3. Support deliverability of renewable resources identified in SDG&E's Renewable Portfolio Standard (RPS) portfolio

B6-1

SVP supports the first objective to maintain reliability of service to load in accordance with the applicable reliability criteria.

B6-2

The application of the second objective is unclear. The DEIR describes alleviating both congestion and thermal overloads as parts of this objective. Thermal overloads that impact the reliability of service to load are addressed in the first objective and should not be doubly considered in this objective. An assessment of congestion and the value in relieving congestion cannot be adequately addressed by a power flow analysis of a limited set of system conditions. Such power flow analyses only provide a snapshot view of the system, typically under stressed and typically infrequent system conditions. To understand the degree to which various alternatives support this objective, a more informative tool would be a multi-area production simulation model. This would allow quantification of the estimated congestion in terms of energy and consumer savings associated with its relief. No such studies have been presented in the DEIR. As a determination of efficiency includes consideration of both the economic costs and benefits, the degree to which each alternative supports the efficient delivery of energy cannot be adequately determined from the information in the DEIR.

B6-3 As for the third objective, California's renewable energy goal is just that, an energy goal. Deliverability is simply a mechanism for determining the extent to which a specific resource counts toward a Load Serving Entity's Resource Adequacy requirements. If the purpose of this objective to support SDG&E's need for RA compliance, more information is necessary to understand SDG&E current state of compliance and the economics of its alternatives. If the purpose of this objective is to support California RPS goals, inadequate information is presented to understand the role of the Proposed Project and its alternatives on the state's ability to meet such goals. If the lack of deliverability is simply a reflection of the severely stressed system conditions under which such studies are done, the potential for congestion and the impact on the achievement of the state's goals may be very small. Again, a multi-area production simulation model would be a better tool for understanding the Proposed Project and the alternatives' impacts on this objective.

B6-4 Given the lack of congestion information and the economic and RPS impacts of its relief, if any, SVP recommends that the selection of the environmentally preferred alternative focus primarily on Objective One and that any consideration of the other two objectives either be rejected or only of a secondary concern unless more information becomes available.

Environmental Impacts of the "No Project" Alternative

B6-5 SVP would encourage the CPUC to re-evaluate the environmental impacts of the "No Project" alternative. The "No Project" alternative consists of three components:

1. Mission—Peñasquitos 230-kV Transmission Line
2. Second Poway—Pomerado 69-kV Power Line
3. Series Reactor at Sycamore Canyon Substation

The two transmission elements of the project, the new Mission-Penasquitos 230kV Transmission line and the second Poway-Pomerado 69kV line, are already approved by the CAISO as stand-alone transmission projects as shown in the most recent CAISO 2014-2015 Transmission Plan.[1] Therefore, the "No Project" alternative does not require any additional transmission line construction beyond what is already in the CAISO transmission plan.[2] Selecting the Proposed Project is unlikely to avoid these environmental impacts. However, the DEIR compares the work associated with these projects against the work associated with the other alternatives. A more appropriate comparison would be to only consider the incremental environmental impacts associated with the "No Project" alternative elements that have not been approved by the CAISO as separate projects. Such a comparison would likely make the "No Project" alternative the environmentally superior option.

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[1] http://www.caiso.com/Documents/Board-Approved2014-2015TransmissionPlan.pdf Pages 251 and 264. The New Mission-Penasquitos 230kV has an expected in-service date of June 2019. The Poway-Pomerado 69kV #2 project has expected In-Service Date of June 2016.

[2] It is expected that the series reactor would be installed inside an existing electric substation.

B6-6

Comparison of the "No Project" Alternative

The "No Project" alternative is very similar to Alternative 36 except that Alternative 36 includes a reconductored Poway-Pomerado 69 kV line rather than the installation of a second circuit. Table 3.4-1 identifies that Alternative 36 does not meet objectives Two or Three.[3] However, based on the above discussion, insufficient information is available to determine how the alternatives perform against these two objectives. Therefore, the "No Project" alternative should be considered as meeting the primary project objective. Coupled with the environmental considerations described above, the DEIR should rank the "No Project" alternative as environmentally superior.

B6-7

Conclusion

SVP appreciates the opportunity to provide these comments to the Commission. It is imperative that the state's electricity infrastructure provide safe and reliable electricity to the state's homes and businesses. However, in doing so, it is critical that all proposed applications are presented to the Commission for complete review in a manner consistent with the Commission's general orders and rules, and that the state's ratepayers not be burdened with costs for unnecessary facilities and projects.

[3] By being silent on Objective One, the presumption is that Alternative 36 meets that objective

3.3.6 Response to Letter B6: Joyce Kinnear, City of Santa Clara Electric Department, Silicon Valley Power

B6-1 Comment noted.

B6-2 The CPUC maintains primary Objective 2 of delivering energy more efficiently to the load center in San Diego as defined under Section 1.1.4 of the Draft EIR. The "efficiency" referenced under Objective 2 relates to the ability of the Proposed Project or project alternatives to reduce potentially constrained transmission lines (e.g., lines that are shown to be 95 percent to 100 percent utilized). Constraints must be alleviated with the use of "congestion management" procedures or actions prior to exceedance of the normal rating.

Neither production simulations nor cost modeling were conducted to assess the potential for congestion or the cost to relieve congestion. Although a power flow analysis provides data on a snapshot of the system, the data can provide adequate and significant information relative to transmission line conditions from a view-point of power flow modeling under various loads and resources conditions (i.e., on-peak, off-peak, Renewable Portfolio Standard (RPS) portfolios, viability of queued generation projects). Additionally, a power flow analysis can determine whether the status of the energy flow on these transmission lines (or other infrastructure components) is approaching normal rating limits and is subject to constraints (i.e., becomes congested) if the load or demand for energy exceeds the normal rating of the transmission line. The data collected allows for the analysis of actual normal, single and double contingency overloads, or other reliability violations.

B6-3 The ability to convey or transport energy generated from renewable resources from point A (i.e., East San Diego County or the Imperial Competitive Renewable Energy Zone) to point B (i.e., San Diego load center) was not meant to be used in the same context as the official CAISO capitalized term "Deliverability". As used by CAISO, the term "Deliverability" refers to a resource that has been studied or analyzed using a specific methodology under various stressed conditions in order to be certified for Resource Adequacy compliance. The Proposed Project and several project alternatives would support California RPS goals by mitigating a number of identified reliability issues (refer to the CAISO's 2012/2013 Transmission Plan), and enabling an increase in flow of energy, primarily from renewable resources. Production cost modeling is not required to determine that operation of the Proposed Project or several of the project alternatives would allow adequate transmission capacity from the Sycamore-Peñasquitos Substation, which would allow increased renewable energy delivery during peak demand. This increased delivery would displace fossil fuel based energy resources with primarily solar resources, as dispatch of solar resources is economically favorable. The Proposed Project would improve delivery of energy from renewable resources consistent with

the California RPS goal to increase utilization of renewable resources to support load.

B6-4 The project objectives and rationale for CPUC definition of the basic project objectives is provided in Chapter 1 of the EIR. An alternative would need to meet two out of the three basic project objectives to satisfy the requirement that an alternative meet most of the basic objectives of the project (CEQA Guidelines Section 15126.6(a)).

B6-5 The purpose of the No Project Alternative "is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approved the proposed project" (CEQA Guidelines Section 15126.6 (e)(1)). The analysis of the No Project Alternative must discuss the existing conditions at the time the NOP was published (August 2014) as well as "what would be reasonably expected to occur in the foreseeable future if the project were not approved". Additionally "if disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed" (CEQA Guidelines Section 15126.6 (e)(3)(B)].

The No Project Alternative considers the reasonably foreseeable actions that would be implemented by SDG&E if the Proposed Project is not approved. If the Proposed Project is not approved, there are potential NERC reliability criteria violations that SDG&E would need to mitigate to avoid fines (up to $1 million per day per violation). The No Project Alternative therefore considers the actions that SDG&E would likely take to attempt to comply with NERC reliability criteria.

SDG&E submitted comments on the description of the No Project Alternative provided in the Draft EIR (see comments D3-4 and D3-11). SDG&E identified five additional upgrades that would likely be required to meet NERC reliability criteria if the Proposed Project or one of the five physical alternatives were not selected by the CPUC. These additional activities include:

- Add Second Miguel—Bay Boulevard 230-kV line
- Add Second Sycamore Canyon—Scripps 69-kV line
- Upgrade Miguel—Mission 230-kV lines 1 and 2
- Upgrade Artesian—Bernardo 69-kV lines 1 and 2
- Upgrade Bernardo—Felicita Tap—Felicita 69-kV line

The description of the No Project Alternative has been edited in Chapter 3: Alternatives to include the five activities listed above in addition to the Mission—Peñasquitos 230-kV and the Second Poway—Pomerado 69-kV lines, which were previously included in the description of the No Project Alternative in the Draft EIR. In addition, each resource section of the Draft EIR has been revised to include an evaluation of the impacts that would result from these five activities in addition to the previously described No Project Alternative (see Volume II of this Final EIR).

Chapter 6: Comparison of Alternatives provides an updated evaluation of all alternatives considered and ranks the No Project Alternative last because it involves construction of approximately 35 miles of new transmission and power lines and reconductoring of approximately 48 miles of existing transmission line. Even if the impacts of the Mission—Peñasquitos 230-kV and Second Poway—Pomerado 69-kV lines were excluded from the impacts of the No Project Alternative because they were separately approved by CAISO, the impacts from the construction of approximately 17 miles of new lines and reconductoring approximately 48 miles of three existing lines would exceed the impacts from constructing the Proposed Project alone (16 miles long).

B6-6 The CPUC screened alternatives, including system alternatives, consistent with CEQA criteria (refer to Appendix D: Alternatives Screening Report of the Draft EIR). In order for an alternative to be carried forward, it needed to meet most project objectives, be potentially feasible, and avoid or reduce significant environmental impacts of the Proposed Project. Alternatives that met all of these criteria were carried forward for a full analysis in the Draft EIR. Alternatives that were carried forward were analyzed at the same level as the Proposed Project so that the CPUC could approve any one (or combination) of alternatives during the decision-making process without additional CEQA review. Consistent with CEQA Guidelines Section 15126.6(e), the No Project Alternative includes actions that SDG&E would likely implement if the application for a CPCN were not approved by the CPUC, i.e., "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The No Project Alternative is not required to meet all project objectives because its purposes is to allow decisionmakers to compare the impacts of approving the proposed project with not approving the proposed project. See responses to comments B6-4 regarding project objectives and B6-5 regarding the ranking of the No Project Alternative.

B6-7 Comment noted.

Comment Letter B7

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Comments on DEIR for A-14-04-011 Sycamore-Penasquitos 230KV Transmission Line.

Wally Wulfeck <whw@san.rr.com> Wed, Nov 11, 2015 at 11:24 AM
To: Jeff Thomas <sycamorepenasquitos@panoramaenv.com>
Cc: Tamar Silverstein <ijs98@earthlink.net>, John Horst <john.h.horst@gmail.com>, Ted Brengel <DTB@tedbrengel.com>, Bob Ilko <srilko4@aol.com>

The Scripps Miramar Ranch Planning Group submits the attached comments on behalf of our planning group and the Mira Mesa Community Planning Group. Our planning group voted unanimously on November 5, 2015 to submit the attached comments.

We believe that insufficient public notice, analysis, and consultation with the community have occurred regarding Alternative 5. The DEIR with respect to Alternative 5 is substantively deficient and should be withdrawn, re-scoped with the new alternatives including new public scoping meetings and consultation with Community Planning Groups, rewritten with complete analyses, and reissued for public comment before it is approved. The CPUC's conclusion that Alternative 5 is Environmentally Superior should be withdrawn until scoping meetings and public discussions are held, complete engineering analyses are performed, and a complete and accurate Environmental Impact Report is available.

Respectfully Submitted,

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SycamorePenasquitosDEIRcomments.pdf
251K

Comments on CPUC Draft Environmental Impact Report on:
San Diego Gas & Electric's Sycamore-Pensasquitos 230-KV Transmission Line Project (A-14-04-011),
State Clearinghouse No. 2014081031

Prepared by: Scripps Miramar Ranch Planning Group
Mira Mesa Community Planning Group

Submitted: November 11, 2015

Introduction: The Scripps Miramar Ranch Planning Group (SRPG) and Mira Mesa Community Planning Group (MMCPG) are among the 42 Community Planning Groups chartered by the City of San Diego. The SRPG and MMCPG provide consultation and recommendations to the City, County, State, and other agencies regarding planning, land use, transportation and traffic, public safety and other issues for the city planning areas of Scripps Miramar Ranch / Rancho Encantada and Mira Mesa.

The SRPG and MMCPG have identified the following misstatements, inaccuracies, omissions, and insufficiencies in the Draft EIR.

B7-1

Issue 1: Improper CPUC Conclusion with respect to Alternative 5.

ES.1.1: The CPUC's conclusion that Alternative 5 is Environmentally Superior is improper because the DEIR does not completely and accurately analyze environmental impacts, for the reasons stated below. The DEIR does not provide an accurate and complete basis for the CPUC's conclusion.

B7-2

Issue 2: Insufficient Public Notice

ES 4.1.1: The Notice of Preparation did not mention Alternative 5.
ES 4.1.2: The public Scoping Meetings held on August 25-26, 2014 made no mention of Alternative 5.
ES 4.1.2: The Scoping Report and Appendices dated September 2014 and posted online made no mention of Alternative 5.

No public announcement regarding the proposal or consideration of Alternative 5 was made. It was first publicly mentioned in Data Request 8 on March 4, 2015 (but referred to as "Alternative 4"). This data request, however, was made only to SDG&E and not to any other interested parties including SRPG. The responses from SDG&E returned information to the CPUC but not to any other interested parties.

B7-3 Additional information about Alternative 5 was requested by the CPUC in Data Request 10 on April 8, 2015, including specific information about EMF modelling. This is the first mention of it in the Public Record. The SDG&E response on April 21, 2015 is particularly enlightening: it essentially says, "this would take too long, and you don't need it anyway." Instead it recommends that the CPUC withhold such information from the public and from decision makers, arguing "there is no agreement among scientists that EMF creates a potential health risk and there are no adopted CEQA Standards for defining health risk from EMF." Further, it recommends that "An EIR may instead conclude that no accepted methodology or standards exist to measure an impact, and such a finding may be upheld if supported by evidence and analysis showing that a reliable method for assessing an impact is not available." The CPUC and SDG&E should present data and modelling results and let the public and decision makers evaluate it. Without this, the DEIR is incomplete, and potentially inaccurate in its conclusions and recommendations..

B7-4 In Mira Mesa, many of the businesses along Miramar Road, Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road. seem not to have received notice. Owners of these businesses (not just property owners) should be allowed to review the alternative in detail. Lack of any response from business owners to date should be considered as prima facie evidence that the noticing process, though it may have been extensive, was not effective.

B7-5 It is clear that there has been no real public involvement in the identification or evaluation of alternatives, because there was no opportunity prior to the DEIR release and Public Comment period. The 45-day comment period provided for review of the DEIR is not sufficient to allow careful analysis and consideration of new alternatives. Instead the NOP and Scoping process should have been re-opened to allow sufficient public awareness and input regarding alternatives which were not included in the original scoping process.

Issue 3: Incomplete Analyses of Alternative Impacts on Biological Resources:

B7-6 Both ES.6.2.2(5) and all of section 4.1.13 omit any mention of the proximity of Carroll Creek, a federally designated wetland, which runs close to and immediately downhill from the south side of Pomerado Road. Construction would undoubtedly result in disturbance of this area and contamination with dust and construction debris. Over time, the installation of the underground line and massive splice vaults will also change hydrology of the creek and therefore affect its biology.

B7-7 There is no mention in the DEIR of coordination with or feedback from any of the Federal agencies with jurisdiction over this area, such as the Army Corps of Engineers, the U.S. Fish and Wildlife Service and/or the Environmental Protection Agency about specific conditions along Pomerado Road. It appears that the engineering plans for

B7-7 Alternative 5 are incomplete so that the exact routing for the line is unknown (see below). Until engineering is farther along, the DEIR cannot be considered complete.

Issue 4: Incomplete Analyses of Aesthetics:

B7-8 ES.6.3.2(5) and Section 4.2.13 omit any mention of the installation of over 30 manhole covers along Pomerado Road and Stonebridge Parkway. Section 4.2.15 improperly concludes that "there is no lasting aesthetic impact from the underground transmission line." Pomerado Road is a designated historic roadway – old US-395. Manholes and other pavement anomalies are unsightly and over time lead to discontinuities in the roadway which are both visually unappealing and a hazard to traffic.

B7-9 ES.6.3.2(5) also omits any mention of the above-ground segment over I-15 although it is covered in section 4.2.13 where the aesthetic impact is improperly dismissed. This location is essentially the entrance to Scripps Ranch. This alternative would add visually unappealing towers, power lines, and marker balls in the most visible area of Scripps Ranch, in an area visible not only from I-15 but from many residences and businesses in Scripps Ranch.

Issue 5: Incomplete Analyses of Geology, Soils, and Mineral Resources:

B7-10 The DEIR, Section 4.5.12 states: "…a geotechnical investigation has not been performed…. Alternative 5 Route is located near surface water resources (Carroll Canyon Creek) where shallow groundwater would be expected; therefore, it is assumed that these areas could be subject to lateral spreading or liquefaction." Later it states that a geotechnical investigation is needed and that the results would be incorporated in the Final design. Since natural groundwater saturation due to the position of Pomerado Road near the bottom of Carroll Creek is inevitable, at this point, the DEIR is incomplete.

Issue 6: Incomplete Analyses of Hydrology and Water Resources:

B7-11 ES.6.7.2(5) notes that the transmission line would be located in a 100-year floodplain, but the only impact mentioned is possible scour of the line. In addition, however, the line's placement would impact water flow in and around Carroll Creek, a federally designated wetland, especially during heavy storm water periods (which incidentally occur much more frequently -- at least every 10 years).

B7-12 Section 4.6.12 states "The underground alignment would cross Carroll Canyon Creek via existing roadway culverts. The underground duct bank construction and transmission line installation would not alter the course of a stream or river because it would be located in the existing roadway alignment above or below the stream channel." This section is incorrect in several respects. First, there are only a few

B7-12 existing roadway culverts along the Pomerado Road route depicted in Figure E.6, but these are not near the road crossing which is shown as new construction. Second, as discussed below, there is insufficient roadway width to safely construct the line and vaults (particularly MH11-13) within the existing Pomerado Road alignment, and if they are located south of the roadway, then installation will not be impervious in the existing alignment, but instead in the Carroll Creek area, a federally designated wetland, and a FEMA flood zone as shown in Figure 4.6-5

Issue 7: Incomplete and Inaccurate Analyses of Transportation and Traffic:

B7-13 Pomerado Road is an arterial travel route for residents of Scripps Ranch and Rancho Encantada, as well as residents of Poway, Ramona, and other areas to the east. It is a designated historical route (US-395) and is a designated emergency evacuation route. It is currently at LOS F in both directions at peak (not E as claimed in the DEIR).

B7-14 Scripps Ranch was affected by the 2003 Cedar Fire, to date the largest wildfire in California history, and was also evacuated in 2007 during the second largest California wildfire. Pomerado Road is a critical part of the evacuation plan approved by the San Diego Fire Safe Council, the City of San Diego Fire / Rescue Department and Homeland Security Department, and the San Diego City Council. It is the only exit for many residents on the south side of Scripps Ranch, and a main escape route for residents of Rancho Encantada, Poway, Ramona, and eastern parts of San Diego County. The approved evacuation plan requires three lanes of travel on Pomerado during an emergency. While the DEIR mentions that Pomerado Road has only two marked lanes, the pavement is barely wide enough for three traffic lanes, even including the bicycle lanes, in many areas. The Fire plan in Appendix I does not mention the possibility of evacuation. The DEIR fails to note that construction-caused disturbance of the traffic along this route, including the bicycle lanes, for a year or more would have an extremely negative impact on critical and life-saving evacuation. Interference with a major evacuation route is absolutely unacceptable.

B7-15 At this point, there is insufficient information in the DEIR to judge the impact and adequacy of analysis. Appendix E contains detailed route maps for Alternative 5. Simple inspection of these maps, however, reveals that they were prepared with little knowledge of the area and little engineering analysis. For example, Figure E-6, maps 3 through 8 show a proposed route mostly along the south edge of Pomerado Road. There are several issues: First, a main wastewater line runs almost exactly along much of that path. Second, in many places along the route, there is a significant downslope. Several splice vaults (e.g. MH12, 13, 15, 16), because of their size, would either need to be located nearer to the center of the roadbed (leaving insufficient safe width for two traffic lanes), or would require shoring and major road reconstruction. Third, the DEIR makes no mention of the main San Diego County Water Authority aqueduct/pipeline which crosses Pomerado Road east of Scripps Ranch Blvd. Avoidance will require much more extensive excavation. In all cases, construction would take longer, and

B7-15 result in much more traffic impact. Further, construction would be more likely to materially affect the federally designated wetland immediately below.

B7-16 There is no analysis of the effect of construction on the I-15 interchanges and the daily backups that occur, and no analysis of the traffic impact on Marshall Middle School. Freeway on-ramp traffic is heavily affected in the morning by MMS, and off-ramp traffic and traffic along Pomerado Road is almost at a standstill during afternoon dismissal and into business rush hours.

B7-17 In Mira Mesa, installation of the Transmission Line and Splice Vaults in Miramar Road immediately west of I-15 will result in unacceptable disruption to traffic in an area that is already at LOS F during AM and PM peak hours. In addition, the proposed routing through Mira Mesa, along Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road, will significantly affect traffic during peak hours. This will also significantly impact traffic to and from MCAS Miramar.

B7-18 Operation of Alternative 5 will lead to continuing unacceptable disturbance of traffic on a designated emergency escape route. Pomerado Road will have at least 12 large splice vaults, and at least 24 new 36" manholes. Even if installed perfectly, manholes will distract drivers and lead to swerving or slowing. Missing or misplaced manhole covers will cause accidents and disrupt traffic. But typically and especially over time, the splice vaults and manholes will result in uneven pavement, more visual disturbance, and potholes, particularly in light of the City of San Diego's record on deferred street maintenance. This will result in additional disturbance to traffic, which, because the road is at LOS F already, is a significant and immitigable environmental impact.

B7-19 Pomerado Road has a class 2 bicycle lane in each direction not separated from traffic. This is the first bicycle route that provides east-west connectivity north of SR-52, and it is a main segment from San Diego to the only north-south bicycle route to Poway, Escondido and other points north along the old US-395 corridor. There is no other continuous north-south bikeway near I-15. Construction of the transmission line will close this route for at least a year during construction, because there is not sufficient roadway width for traffic lanes.

Operation of Alternative 5 will lead to continuing disturbance of traffic as described above, and this will lead to unacceptable bicycle safety issues along the Pomerado corridor. This could be mitigated by installation of a Class 1 bicycle lane adjacent to Pomerado Road along with the proposed transmission line.

B7-20 Section 4.7.13 fails to mention that the overhead portion of the transmission line across I-15 is immediately adjacent to Marine Corps Air Station Miramar in an airport influence area, and in a main military helicopter transit lane. While this section claims that compliance with FAA requirements will make the operational impact less than significant, this is unlikely due to proximity to the Air Station. Certification of compliance for this alternative should be obtained from the FAA before the EIR is finalized.

B7-21 Section 4.7.13 also fails to mention that the I-15 overhead is within about ¼ mile of the Southern California Terminal Radar Approach Control Facility (TRACON), the FAA's air traffic control facility for all of Southern California, and is very near the Miramar MCAS. The TRACON serves most airports in Southern California and guides about 2.2 million aircraft over roughly 9,000 square miles in a year, making the facility one of the busiest in the world. The TRACON provides radar air traffic approach control services to all arriving and departing aircraft for most airports in Southern California. The TRACON's airspace covers an area from 20 miles north of Burbank to the US/Mexican border and from San Bernardino to Santa Catalina Island. Ongoing electrical and corona interference from operation of the overhead transmission line is likely to impact radio communications at both the TRACON and Miramar MCAS, and will therefore affect flight safety in all of Southern California. Certification from the FAA is required before the EIR is finalized.

Issue 8: Incomplete and inaccurate Analysis of Fires and Fuels Management.

B7-22 ES-6.13.2(5): The analysis completely ignores the fire danger along Pomerado Rd, which at present is one of the most fire-prone areas in San Diego County. Large amounts of dry, overgrown, unmaintained brush and trees are within 10 to 20 feet of Pomerado Road immediately adjacent to the route shown in the maps in Figure E-6. The fire danger is already under study by the Fire Safe Council, the San Diego City Council, County Supervisor, our State Assembly Member, and our Member of Congress.

The Fire Plan in Appendix I makes no mention of how to accommodate a major fire, or a mandatory evacuation, such as those that have been ordered twice in the last 12 years. Pomerado Road is a designated evacuation route, not only for Scripps Ranch, but for Rancho Encantada, Poway, Ramona and other northeast county residents.

Issue 9: Incomplete Analysis of Health and Public Safety.

B7-23 There should be a separate health and public safety analysis for the Pomerado Road evacuation route resulting from anything that would impact the free flow of traffic. This would be especially true at night when there may be construction crews and trucks in place (Construction might be done at night to avoid impact in the day traffic). Combine construction crews, changed traffic work-arounds, and darkness in an emergency to aggravate the evacuation issue. The heavy traffic (already observed during previous evacuations) would be made substantially worse by any construction during fire / smoke conditions which would result in high impact effects on breathing / pulmonary / heart conditions as well as asthma, allergies, and any stress related illness. Worse, any construction that would force a re-directed evacuation would add confusion and anxiety and increase possibilities of death or injury.

Issue 10: Incomplete Analysis of Greenhouse Gases.

B7-24 ES.6.15.2(5): The analysis ignores the additional vehicle emissions from waiting during construction due to lane restriction. Operation of Alternative 5 will lead to increased vehicle emission due the continuing disturbance of traffic as described earlier.

Issue 11: Incomplete Analysis of Utilities and Public Service Systems.

B7-25 No mention is made in the DEIR of the main San Diego County Water Authority aqueduct which crosses under Pomerado Road just east of Scripps Ranch Blvd. Avoidance of this pipeline will require much more extensive excavation.

B7-26 ES.6.18.2(5): Pomerado Road is a main travel route for emergency service vehicles in Scripps Ranch and Stonebridge estates, as well as for Poway, Ramona, and other areas to the east. The analysis ignores the traffic disturbance due to construction and ignores the fact that lane restrictions due to the narrow width of Pomerado Road and pavement anomalies would continue to impede emergency vehicles during operation.

Issue 12: Incomplete Analysis of Impact on Military Readiness.

B7-27 There is no mention in the DEIR of any coordination or contact with the Navy or Marine Corps regarding Alternative 5 and the impact, if any, on the Marine Corps Air Station Miramar, the Navy Operational Support Center / Marine Corps Reserve Center, the Lincoln Military Housing at Pomerado Road and Scripps Ranch Row, or the East entrance to MCAS Miramar East at old Spring Canyon Rd / Sycamore Test Rd.

Issue 13: Incomplete Analysis of Cumulative Impacts.

B7-28 ES.7.3 and Table ES.7-1 ignore the following Impacts in the Scripps Ranch area associated with Alternative 5:

- Continuing alteration of biology in the Carroll Creek watershed due to alteration of water flow.
- Continuing degradation of visual appearance due to over 30 manhole covers installed in a historic highway.
- Continuing effects due to alteration of hydrology in the Carroll Creek area.
- Continuing significant and unavoidable impediments to traffic flow due to pavement anomalies from splice vaults and manholes.
- Continuing interference with a critical fire / emergency evacuation route.
- Continuing increased danger to cyclists due to traffic interference with current class 2 bicycle lanes.
- Continuing long term increase in Greenhouse Gases due to traffic restriction.

B7-28

- Continuing interference with air traffic and communications

B7-29

The most important cumulative impact is on future Utility and Service systems. This impact is completely ignored in the DEIR, but is cumulatively considerable. Aside from any induced-current effects on existing utilities, the new transmission line will prevent or greatly increase the difficulty of construction of new or upgraded sewer, storm water, potable water, recycled and reclaimed water, natural gas, residential-electricity, telephone, and data communications facilities along Pomerado Road, Stonebridge Parkway, and in the Mira Mesa Industrial area. Physically, the large volume of concrete and the extensive splice vaults will have to be avoided in any future repair of existing facilities or construction of new facilities. Induced current and magnetic effects may preclude installation of any future systems involving metal piping or conductors. These impacts might be partially mitigated by coordinating with other utilities and installing new systems at the same time and as a condition of approval as the proposed transmission line. For example, a reclaimed water line ("purple pipe") extending from the present terminus on Pomerado Road at Avenue of Nations east on Pomerado Road to Stonebridge Parkway has been proposed for several years, and should be required as a condition of approval. However, at this point it is clear that no planning or coordination with the City or community has been conducted.

Issue 14: Inaccurate and Incomplete Analysis of Cumulative Impacts.

Table 5.4-1 lists projects which might cumulatively impact project alternatives. It is inaccurate and incomplete.

Project No. 41, is incorrectly described. The Carroll Canyon Commercial Center was withdrawn approximately a year ago. A mixed use complex with about 250 residential units and 12,000 square feet of commercial retail space is now pending. The DEIR is expected in 2015.

Table 5.4.1 omits at least the following approved and planned projects:

B7-30

Chabad Scripps Ranch Campus of Life: Construct three multi-story dormitory apartment buildings on site. Approved in 2009. 10785 Pomerado Rd, Construction to begin in 2015 or 2016.

Fire Station 37 Annex at Pomerado Road and Avenida Magnifica. Construction is planned in 2017.

SDG&E / SOCALGAS Pipeline Safety and Reliability Project – This is a 47-mile 36" Natural Gas Transmission line filed with the CPUC in Sept. 2015. The recommended route includes an underground segment under Pomerado Road along the exact route proposed for Alternative 5. At this time, while it is possible that both lines can be installed if they are at least 5 feet apart, it appears unlikely that both the electrical and gas transmission lines can be accommodated

B7-30 everywhere along the route because of the width of Pomerado Road, the proximity to slopes and wetlands, and the presence of other utility lines. Also, the timing of the projects may preclude simultaneous installation unless the Electrical Transmission project is substantially delayed.

In addition, there are many more projects along the proposed route in Mira Mesa which are not identified in Table 5.4.1. Please visit opendsd.sandiego.gov for further information.

Issue 15: Insufficient Analysis of Environmental Effects Which Will Cause Substantial Adverse Effects on Human Beings.

B7-31 Construction associated with Alternative 5 will have a profound impact on businesses along Miramar Road, Kearny Villa Road, Black Mountain Road, Activity Road, Camino Ruiz, Miralani Drive, Arjons Drive, Trade Place, Camino Santa Fe, Carroll Road, Carroll Canyon Road and Scranton Road. The impact will spread throughout the Miramar Industrial area and along all of Miramar Road due to traffic displacement. Many of these businesses are involved in essential services to Human Beings, including institutional food service supply, medical devices and services, biologic services and supplies, time-critical construction supplies, support for MCAS Miramar, etc. Construction in the area will lead to months of disruption to these businesses and impact on their customers. In some instances, the business may not be able to continue operation after the project is complete due to loss of business during construction. Although discussion with local business and citizen groups should have occurred during analysis of Alternative 5, some mitigation might still be possible by working closely with the individual businesses to develop a schedule that will minimize impacts to the point that they are considered acceptable.

Issue 16: Incomplete Identification and Analysis of Alternatives

B7-32 Appendix D gives other project alternatives that were rejected during analysis. Many of these alternatives are from outdated prior analyses. However, if even a little consultation had occurred with local community planning groups, other alternatives with much less negative impact on Mira Mesa than Alternative 5 could easily have been identified. Carroll Canyon, between Black Mountain Road west to Fenton Road / Carroll Canyon Road, is currently a sand/gravel quarry owned by Vulcan Materials Company. Vulcan is currently pursuing approval of a plan to build a mixed use project in the canyon that would include the construction of Carroll Canyon Road as a city-owned six-lane connector spanning the distance between I-15 and I-805. Small portions east from I-805 and west from Camino Ruiz are already constructed. While more construction is still several years in the future, temporary transmission lines could be run overhead now in Carroll Canyon, and then undergrounded in conjunction with the construction of Carroll Canyon Road. This would have almost no environmental impact since most of Carroll Canyon has been disturbed by surface mining operations for

B7-32 decades, and is not close to businesses or housing. The eastern end of Carroll Canyon could be reached either from Segment A at I-15, under Mercy Road and south on either Black Mountain Road or Camino Ruiz, or from the Alternative 5 underground at Pomerado Road and I-15. The western end of Carroll Canyon is close to the Alternative 5 routing near Fenton Road and Carroll Canyon Road.

B7-33 **OVERALL CONCLUSION:**

Given the missed alternatives, omissions, and errors in the DEIR it is clear that insufficient public notice, analysis, and consultation with the community have occurred regarding Alternative 5. The DEIR with respect to Alternative 5 is substantively deficient and should be withdrawn, re-scoped with the new alternatives including new public scoping meetings and consultation with Community Planning Groups, rewritten with complete analyses, and reissued for public comment before it is approved. The CPUC's conclusion that Alternative 5 is Environmentally Superior should be withdrawn until scoping meetings and public discussions are held, complete engineering analyses are performed, and a complete and accurate Environmental Impact Report is available.

3.3.7 Response to Letter B7: Wallace H. Wulfeck, Scripps Miramar Ranch Planning Group

B7-1 Each alternative retained for analysis in the Draft EIR is described in detail in Chapter 3: Alternatives. Full analysis of Alternative 5, including identification and analysis of significant impacts and feasible mitigation measures to mitigate these impacts, is provided within the analyses of each resource area. For example, in Section 4.1: Biological Resources, the Proposed Project's impacts on biological resources are described and analyzed, followed by analyses of the impacts of each project alternative (1 through 5) on biological resources. A comparison of the Proposed Project and Alternative 5 is provided in Chapter 6: Comparison of Alternatives. Pursuant to the requirements of CEQA Guidelines Section 15126.6(e)(2), Chapter 6 identifies Alternative 5 as the Environmentally Superior Alternative, and discusses the basis for this selection.

B7-2 CEQA does not require that the alternatives to a project be included or described in the NOP of the EIR (PRC § 21080.4(a); CEQA Guidelines Section 15082). An NOP is required to provide responsible and trustee agencies, as well as any federal agencies involved in approving a project, with sufficient information describing the project and its potential environmental effects to enable these agencies to make a meaningful response. Pursuant to CEQA Guidelines Section 15082, the NOP shall include a description of the proposed project and its location, and the probable effects on the environment. Within 30 days of receiving the NOP, agencies must provide the lead agency (the CPUC), with specific recommendations about the scope and content of the EIR, including significant environmental issues, as well as reasonable alternatives and mitigation measures that they wish to see explored in the Draft EIR. Consistent with CEQA, the CPUC was not required to identify project alternatives prior to release of the NOP, and prior to receiving feedback from other agencies and members of the public.

The alternatives to be considered in a Draft EIR are not required to be developed at the time an EIR is scoped or included in a scoping report. Early public consultation, or "scoping", may be used by a lead agency to identify "the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important" (CEQA Guidelines Section 15083 (a)). Consistent with CEQA's guidance on scoping, the CPUC used the comments received during the scoping period to: (1) define the alternatives to be evaluated in the Draft EIR, (2) focus the environmental analysis, (3) identify impacts for analysis in the Draft EIR, and (4) identify mitigation measures to be considered in the Draft EIR. (See Scoping Report, available at http://www.cpuc.ca.gov/Environment/info/panoramaenv/Sycamore_Penasquitos/PDF/Syc_Pen_Scoping_Report.pdf.)

As required by CEQA, the Draft EIR includes a range of reasonable alternatives to the Proposed Project, or to its location, which would feasibly attain most of the

basic objectives of the project but would avoid or substantially lessen any of its significant effects (CEQA Guidelines Section 15126.6). The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project (CEQA Guidelines Section 15126.6(d)). Consistent with these requirements, the Draft EIR identifies and describes a reasonable range of alternatives to the Proposed Project, describes the methodology used to develop, evaluate and screen these alternatives, analyzes the impacts of the alternatives on each resource area, and identifies feasible mitigation measures to reduce or avoid significant effects. The Draft EIR also contains a detailed Alternatives Screening Report in Appendix D, which supplements the information provided in Draft EIR Chapter 3: Alternatives.

B7-3 There are currently no defined or adopted CEQA standards for defining health risk from EMF, and EMF is not considered to be an environmental impact under CEQA. For these reasons, analysis of potential project-related EMF, or potential EMF associated with project alternatives, is not required for inclusion in an EIR. However, modeling of the potential EMF generated by the Proposed Project is presented in Chapter 2: Project Description. Consistent with this informational approach, the CPUC requested information from SDG&E on EMF for alternatives in order to include this information in the Draft EIR and provide it to the public and decision makers. SDG&E provided EMF data for the alternatives to the CPUC on September 29, 2015 and corrections to this EMF data on January 4, 2016 in response to CPUC Data Request #19 dated December 22, 2015. The corrected EMF data is included in Appendix C: EMF Data for Project Alternatives of this Final EIR. See also General Response GR-3.

See General Response GR-1 regarding the CPUC policy that includes consideration of "low- and no-cost" measures to reduce EMF. If an alternative to the Proposed Project were adopted by the CPUC, SDG&E would be required to adopt an EMF Management Plan similar to the EMF Management Plan prepared for the Proposed Project.

B7-4 All property owners within 1,000 feet of the Proposed Project alignment and alternative alignments were mailed a Notice of Availability (NOA) for the Draft EIR, a copy of which is included in Attachment 1: Draft EIR Public Review Materials of this Final EIR. Flyers with information pertaining to the Draft EIR and planned community meetings were also posted at 44 locations as listed in Attachment 1 of this Final EIR along with a copy of the flyer. Notices were also printed in the San Diego Union Tribune on Saturday, September 26, 2015. The NOP was also posted at the San Diego County Clerk's office for 30 days starting on September 18, 2015, as required by CEQA. The noticing for the Proposed Project and all alternatives considered in the EIR exceeded the notification requirements specified in CEQA Guidelines. As required, the NOA must be mailed to all organizations and individuals who have previously requested the notice in writing

as well as either publication in a local newspaper, posting of a notice, or direct mailing to the owners and occupants of property contiguous to the parcel(s) on which the project is located (CEQA Guidelines Section 15087(a)). Notified property owners and any interested individual had the opportunity to review the EIR and provide comments.

B7-5 See response to comment B7-2 for details regarding the NOP, EIR scoping, and the process for selecting alternatives to the Proposed Project.

The required time periods for public review of draft EIRs are set forth in CEQA and the CEQA Guidelines (See PRC § 21091(a); CEQA Guidelines Sections 15087, 15105, 15205). Generally, a draft EIR must be circulated for public review for 30 days, but the public review period for EIRs submitted to the State Clearinghouse must be at least 45 days (unless a shorter period, not less than 30 days, is approved by the State Clearinghouse) (CEQA Guidelines Section 15105(a)). Under CEQA Guidelines, the review period should not be longer than 60 days, except in unusual circumstances (*Id*.). Consistent with these requirements, the Draft EIR was released for public review on September 17, 2015, and comments were due on or before November 2, 2015, a 45-day comment period. At the request of the Scripps Miramar Ranch Planning Group, the CPUC extended the deadline for receipt of comments by two weeks, to November 16, 2015, resulting in a 61-day comment period.

B7-6 Carroll Canyon Creek is defined as Waters of the U.S. rather than a "federally designated wetland" and is under United States Army Corps of Engineers (USACE) jurisdiction. Alternative 5 would not result in fill of or disturbance within Carroll Canyon Creek. Alternative 5 proposes to construct the duct banks and vaults within the paved road width of Pomerado Road, which is located within the 100-year flood plain of Carroll Canyon Creek. As discussed under Section 4.6.12.2, Impact Hydro-3 of the Draft EIR, the Alternative 5 underground duct bank and vault construction would be located within the existing roadway alignment (i.e., be buried within the existing paved road), above or below the stream channel, and therefore would not change the hydrology of the creek. Consequently, the Carroll Canyon Creek hydrology would not be affected by the operation of Alternative 5.

The water quality impacts on Carroll Canyon Creek from sediment and hazardous materials entering the creek during construction of Alternative 5 are discussed under Section 4.6.12.2, Impact Hydro-1 of the Draft EIR. These impacts would be significant prior to application of APMs. SDG&E would implement APMs HYDRO-1 (temporary BMPs), HYDRO-2 (permanent BMPs), GEO-3 (minimize soil disturbance), HAZ-1 (SEAP), and HAZ-2 (consistency with state and federal regulations) to reduce impacts from soil disturbance and hazardous materials during construction. Impacts would be less than significant with mitigation.

B7-7 USFWS and CDFW were contacted during the Draft EIR process regarding key biological resource topics. Several meetings were held between the CPUC, USFWS, and CDFW during preparation of the Draft EIR to discuss various potential direct and indirect impacts of the Proposed Project and alternatives, the adequacy of SDG&E's NCCP/HCP, and the adequacy and appropriateness of individual mitigation measures. The wildlife agencies also reviewed the Draft EIR and provided additional comments (see comment letter A2). USACE and U.S. EPA were not directly consulted regarding waters of the U.S. or federal jurisdictional wetlands along Pomerado Road as no direct impacts are anticipated from construction within the road bed; however, both of these federal agencies received the NOP and were noticed during CEQA scoping and during the public review of the Draft EIR. Neither the USACE nor the U.S. EPA provided scoping or Draft EIR comments.

The analysis in the Draft EIR was based on sufficient information and specificity about the Proposed Project to allow for meaningful analysis of impacts and comparison of alternatives. Specifically, the Draft EIR was prepared using preliminary engineering plans and data prepared by SDG&E which was sufficiently analyzed to provide decision makers with information enabling them to take into account environmental consequences and make an informed decision (CEQA Guidelines Section 15151). Consistent with this mandate, the Draft EIR analyzed the Proposed Project at the level of detail required by CEQA (refer to CEQA Guidelines Section 15124, requiring a general description of the project's technical, economic and environmental characteristics). Final engineering plans will be prepared after the CPUC reviews and approves either the Proposed Project or one of the alternatives.

B7-8 Specific sections of the original U.S. Route 395 are identified as "Historic U.S. 395 Route" with the use of decorative roadway signs approved under California Assembly Concurrent Resolution No. 98 (proposed February 14, 2008 and subsequently adopted). Some of this decorative signage is located along Pomerado Road within Alternative 5. The decorative signs are separate from cultural resource listing on the California Register of Historical Resources (CRHR) and are not intended to indicate that the signed potions of the roadways are listed in the CRHR. The legislation specifically states that the signage denoting "Historic" along the original U.S. Route 395 shall have no impact upon future development proposed on private or public land.

A small segment of the original U.S. Route 395 located outside of the Alternative 5 alignment has been recorded as a cultural resource pursuant to the CRHR, but the recorded segment is abandoned and no longer used as a roadway. There are no portions of the existing Pomerado Road or any other segment of Alternative 5 designated as a historic resource in federal, state, or local registers. Construction of Alternative 5 would occur within the roadway and would not disturb any recorded segments of the original U.S. Route 395.

New vault structures, each with two manhole access covers, would be constructed approximately every 1,800 along Pomerado Road as part of Alternative 5. The vaults and manholes would be flush with the paved roadway surface. These facilities would be visible to both transiting motorists and bicyclists using Pomerado Road if their view is focused down at the roadway, similar to how existing utility manholes are visible in Pomerado Road and in many other roads throughout San Diego County where underground utilities are installed. The new vault structures and manholes would not increase traffic hazards as they would not create either a visual distraction or a visual barrier to motorists and bicyclists as these facilities would neither be raised in profile above the roadway surface or brightly colored.

Mitigation Measure Geology-3 requires geotechnical surveys for potentially expansive or collapsible soils and inclusion of appropriate design features, including excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill. Therefore, with mitigation, subsidence of the vault structures or the surrounding road bed would not occur following construction.

B7-9 The above-ground segments of Alternative 5 are fully described in Section 3.5.5 and are illustrated in Appendix E: Detailed Alternative Route Maps of the Draft EIR. Alternative 5 would not impact any scenic resources (i.e., highways or vistas) in the vicinity of the I-15 overhead crossing proposed as part of Alternative 5 because no scenic resources exist in the area. The Alternative 5 key view (Figure 4.2-51) and visual simulation (Figure 4.2-52) depict the view with the greatest contrast between existing and proposed conditions for the I-15 overhead crossing. The proposed poles, marker balls, and transmission line would be partially screened from view at other potential viewing points along public roads (e.g., Pomerado Road, Miramar Road) where residences and businesses are located. The business area and residential homes are skirted by eucalyptus trees which would screen a substantial amount of the I-15 crossing. The Draft EIR found the visual character impact on the I-15 crossing area to be less than significant as analyzed under Section 4.2.13.2 of the Draft EIR.

In its comments on the Draft EIR, SDG&E provided additional design options to the I-15 overhead crossing. The Draft EIR has been revised to include these three options, which include: (1) the original overhead design to construct two cable poles and two interset poles on either side of I-15, (2) an overhead design that would eliminate the two interset poles, reducing the number of pole structures needed for the crossing from four to two, and (3) an underground design that would place the 230-kV line in the Pomerado Road freeway overpass structure, eliminating the need for an overhead crossing. All design options would require review and approval by Caltrans before it could be implemented. Design Options 2 and 3 would further reduce an already less than significant impact on the visual

character of the area. See response to comment D2-17 for further information regarding the inclusion of design options for the crossing of I-15.

B7-10 The potential for lateral spread or liquefaction due to the high potential for shallow groundwater along Alternative 5 was identified in Section 4.5.12, Impact Geology Soils Mineral-3 of the Draft EIR. Consistent with CEQA requirements for mitigation, Mitigation Measures Geology-1 and Geology-3 require the geotechnical investigation completed as part of the final design process to address liquefaction and lateral spreading, and require that investigation's recommendations to be incorporated into the final design of Alternative 5 to reduce impacts from lateral spread or liquefaction to less-than-significant levels. See response to comment B7-7 for information regarding level of detail required for description of a project. The final design will be prepared after the Proposed Project or an alternative is approved by the CPUC, at which time a detailed geotechnical investigation will be completed.

B7-11 A 100-year flood is defined as a flood with a 1 percent chance of occurring in any given year. A 100-year floodplain is the area that would be affected by a 100-year flood. As described under Section 4.6.12, Impact Hydro-9, the Alternative 5 alignment would span the Los Peñasquitos Creek 100-year flood hazard zone and the underground alignment would be located within the Carroll Canyon Creek 100-year flood zone. Mitigation Measure Hydrology-5 would reduce the impact from potential scour to less than significant. Contrary to the commenter's assertion, the transmission line would not impact the Carroll Creek water flow, as analyzed under Section 4.6.12, Impact Hydro-4, because the underground alignment would be located within existing roadways and would either be buried at a sufficient depth below the creek or located well above the creek so that the transmission line duct bank is not exposed to creek flows. Additional language has been added in Section 4.6.12.2, under Impact Hydro-4 to clarify that Carroll Creek would not be impacted by Alternative 5.

Construction

~~No construction would~~ Carroll Creek is culverted beneath Pomerado Road. Construction would remain within the roadway and would not occur within a creek, stream or river. There would be no impact caused by the alteration of the course of a stream or river.

B7-12 Portions of the alignments are within a 100-year FEMA designated flood zone as described in Section 4.6.12, Impact Hydro-9 of the Draft EIR. Mitigation Measure Hydrology-5, which requires the buried transmission line to be located below the expected depth of scour from a 100-year flood, would reduce impacts associated with exposure to scour.

Figure E.6 in Appendix E: Detailed Alternative Route Maps of the Draft EIR depicts a preliminary routing for underground construction and placement of splice vault

structures based on preliminary engineering provided by SDG&E; however, it does not depict or specifically call out the locations of existing roadway culverts as indicated by the commenter. Construction details for each roadway culvert crossing will be developed as part of the final engineering design if Alternative 5 is approved by the CPUC.

The existing utilities in Pomerado Road occupy roughly 14 to 17 feet of the roadway as described in Section 3.5.5.2 of the Draft EIR. The total width of Pomerado Road, including the bicycle lanes, ranges from approximately 40 feet to 62 feet. The splice vaults would measure about 24 feet long by 10 feet wide by 10 feet deep and would be installed every 1,800 feet along the underground portion of the alignment. Trenching for the underground transmission line would require an approximately 16-foot-wide work area including the space for construction vehicles and equipment. The work area would increase to a maximum of 130 feet long and 30 feet wide (including construction vehicle width) during vault installation. Construction of the underground alignment is proposed to be confined within the existing roadway and not south of the roadway as the comment indicates. Based on the measurements outlined above, there is adequate roadway width within Pomerado Road to safely construct the underground transmission lines and splice vaults proposed under Alternative 5.

B7-13 See response to comment B7-8 for information regarding U.S. Route 395.

The LOS of Pomerado Road between I-15 and Willow Creek Road was calculated using the City of San Diego Traffic Impact Study Manual, July 1998. City of San Diego (the agency with jurisdiction over Pomerado Road) uses average daily traffic (ADT) volume and roadway capacity to determine LOS. Pomerado Road is a two lane undivided road and is classified as a collector road. The road was inadvertently misclassified as an arterial road when performing LOS calculations. The misclassification of the road as an arterial road rather than a collector road resulted in an incorrect LOS calculation. The LOS calculation has been updated from LOS E to LOS F; however, the change from LOS E to LOS F does not change the analysis and conclusions set forth in the Draft EIR, nor does it result in new significant effect or a substantial increase in the severity of an environmental impact. The City LOS standard is D. Neither LOS E nor LOS F meet the City standard, resulting in a significant and unavoidable impact. Table M-9 in Appendix M: Transportation and Traffic Supporting Information of the Draft EIR has been revised to reflect changes in LOS on Pomerado Road. Impacts Traffic-1 and Traffic-2 remain significant and unavoidable in the Draft EIR even with the reclassification of the LOS from E to F.

See General Response GR-12 for a detailed discussion of Proposed Project and alternative impacts on emergency evacuation and mitigation for those impacts.

B7-14 See General Response GR-12 for a detailed discussion of impacts on evacuation routes and mitigation for those impacts. Mitigation Measure Traffic-6 would require detours for any temporary lane or road closures. Trenching along Pomerado Road is anticipated to occur over an approximate 4 month period and active trenching and duct bank construction would be limited to approximately 80-foot-long roadway segments that would require temporary lane closures during the work day hours. After hours, these locations would otherwise be covered with steel plates and open to traffic flow.

B7-15 See response to comment B7-12. The preliminary engineering indicates that there is sufficient roadway width to install the proposed underground transmission line with the existing utilities, including the wastewater pipeline, in the roadway. The underground transmission line would be located within the existing paved roadway width. The widest facilities proposed within the roadway are the splice vaults. The 10-foot wide splice vaults could be accommodated by the remaining roadway width assuming that the existing utilities take up 14 to 17 feet. The underground transmission alignment would be located within the existing roadway width at the Second San Diego Aqueduct crossing. The depth of the underground transmission line would be adjusted to avoid conflicts with the Second San Diego Aqueduct as required by Mitigation Measure Utilities-3.

Alternative 5 construction would occur within the roadway and not within the adjacent side slopes. There is not a significant downslope within the roadway. Changes in slope within the roadway would not affect construction or operation of the Proposed Project or project alternatives. See response to comment B7-11 regarding potential effects to federal-regulated waters of the U.S. including wetlands.

B7-16 The impact on I-15 from closure during conductor stringing and installation of guard structures is analyzed under Section 4.7.13.2, Impact Traffic-7. Temporary closure would cause a significant impact on traffic flow as described in the EIR. The impact would be reduced to less than significant with implementation of Mitigation Measure Traffic-5, which requires preparation and implementation of a highway closure plan requiring that closure or partial closure of I-15 be limited to off-peak, non-daytime house, from 10 PM to 5 AM. Furthermore, traffic delays resulting from lane closures on Pomerado Road, described in Section 4.7.13.2, Impact Traffic -6, would be reduced to less than significant with implementation of Mitigation Measure Traffic-6, which restricts lane closures to off peak hours.

B7-17 Miramar Road is ranked at LOS D, not LOS F as indicated by the commenter (See Appendix M, Table M-9 of the Draft EIR). The LOS of Miramar Road between I-15 to Kearny Villa Road was calculated using the City of San Diego Traffic Impact Study Manual, July 1998. The City of San Diego (the agency with jurisdiction over

Miramar Road) uses ADT volume and roadway capacity to determine LOS. Miramar Road is a three lane road and is classified as Primary Arterial.

The underground transmission line will be constructed in phases approximately 80 feet long; an entire road segment would not be closed for the duration of underground construction. Temporary traffic impacts due to lane closures would be experienced along short stretches of the route during construction. The addition of construction traffic and decreased capacity on Pomerado Road which does not currently meeting LOS standards would cause a significant and unavoidable impact on LOS, as analyzed in Section 4.7.13.2 of the Draft EIR.

Miramar Road, Kearny Villa Road, Camino Ruiz, and Camino Santa Fe are used to access MCAS Miramar. The Alternative 5 alignment traverses small portions of these major connecting roads. The alignment follows Miramar Road for a short stretch before routing north to Activity Road, Miralani Drive, Arjons Drive, Trade Place and Trade Street. Activity Road, Miralani Drive, Arjons Drive, Trade Place, and Trade Street primarily support traffic associated with local commercial businesses, warehouse, and industrial uses. Lane closures and impacts due to construction traffic traversing the major connecting roads would be limited in duration and length. Mitigation Measure Traffic-6 would further reduce impacts on peak traffic because it requires SDG&E to avoid constructing within roadways during peak commute hours. Construction impacts on traffic along the roads used to access MCAS Miramar would be less than significant.

B7-18 See response to comment B7-8 regarding visual impacts, the potential for uneven pavement following vault structure/manhole installation, and the potential for distracting motorists and bicyclists. Manholes are designed to be flush with the roadway and would be a dark metal, similar to the color of roadways. There is no evidence to support the commenter's assertion that manholes would result in distracted drivers, unsafe driving conditions, or that manhole covers would be missing or misplaced. See response to comment B7-13 regarding the LOS of Pomerado Road.

B7-19 Temporary closure of the bicycle lanes would cause a significant impact on bicyclists as described in Section 4.7.13.2, Impact Traffic-4 of the Draft EIR. The impact would be less than significant with implementation of Mitigation Measure Traffic-1, which requires implementation of a CTMP, and Mitigation Measure Traffic-7, which requires closure notification and establishment of detours for bicyclist safety. Trenching along Pomerado Road is anticipated to occur for approximately 4 months, not over a year as asserted by the commenter. Trenching would require temporary closures and detours around short lengths of roadway/bicycle lane, approximately 80 feet, during any given work day. The full length of the roadway where the proposed underground alignment would occur will not be closed all at once.

Annual inspection and emergency maintenance activities, as needed, would occur during operational life of Alternative 5. Inspection would occur once every one to three years and would require less than one day per vault as described in the EIR. Disturbance of vehicle and bicycle traffic would be less than significant during operation.

B7-20 The I-15 overhead crossing proposed under Alternative 5 is outside of the MCAS Miramar property but is located within a flight path utilized by MCAS helicopters (City of San Diego 2007). The MCAS Miramar Community Plans and Liaison Office has reviewed the Draft EIR and provided a comment letter (See Comment Letter A1. SDG&E is required to file Form 7460 with FAA prior to construction as described in response to comment A1-1. SDG&E will file Form 7460 prior to construction once the CPUC has approved the Proposed Project or an alternative.

B7-21 The potential interaction between electrical fields or corona noise and radio communications is outside the scope of CEQA; however, electrical fields, corona and radio communication impacts are described generally in Chapter 7: Other CEQA Considerations of the Draft EIR. As noted in Section 2.6.3.2 of the Draft EIR, electric fields decrease with distance and can be blocked by most materials, limiting potential interference. As discussed under Section 4.8.7.1 of the Draft EIR, corona noise also decreases with distance. There would be no interference with radio communications from the proposed transmission lines.

The CPUC consulted with FAA regarding potential Alternative 5 effects on the TRACON facility (See Attachment 2: Agency Correspondences of this Final EIR for record of correspondence with Diana Erazo at FAA). The FAA remarked that facilities that are properly insulated and maintained are not a major concern for radio frequency interference; however, no determination can be made until a Form 7460 has been filed. SDG&E will file Form 7460 prior to construction once the CPUC has approved the Proposed Project or an alternative. Certification from the FAA is not required before the EIR is finalized as asserted by the commenter.

B7-22 The Peñasquitos Fireshed, which includes Pomerado Road, is described under Section 4.12.2.2 of the Draft EIR. The area experiences periodic extreme fire weather events when elevated fire danger occurs. The overall risk of ignitions leading to catastrophic events in the Peñasquitos Fireshed is moderate, but fuel loads are patchy and enclosed by developments, so the fire risk may be higher in some locations. There is a high degree of development at the wildland urban interface in this fireshed, placing numerous assets at risk from ignitions during extreme fire weather. Construction of Alternative 5 could result in wildfire ignitions even though the construction would occur in trenches along Pomerado Road, as analyzed under Section 4.12.13.2, Impact Fire-1 of the Draft EIR. Mitigation Measures Fire-1, Fire-2, Fire-3, and Fire-4 would reduce impacts from fire ignition to less than significant. Mitigation Measure Fire-2 specifically requires SDG&E to

coordinate with fire protection and emergency service providers to ensure that construction equipment and personnel would not create obstructions for firefighting equipment or crews.

The fire plan presented in Appendix I of the Draft EIR is a Draft Fire Prevention Plan for the Proposed Project. If Alternative 5 is approved by the CPUC, the Final Fire Prevention Plan would be prepared for the project as proposed under Alternative 5. Additional language has been added to Mitigation Measure Traffic-6, which requires SDG&E to quickly cover underground work areas with steel plates in the event of an emergency to open lanes and permit unimpeded evacuation. See response to comment B1-2 and General Response GR-12 for further discussion regarding emergency evacuation.

B7-23 Trenching and other construction activities along Pomerado Road would occur between the hours of 7 AM and 7 PM within the City of San Diego and between 7 AM and 5 PM in the City of Poway. Night and weekend construction may be required for activities at staging yards or where equipment and materials are stored in the ROW. Work outside of normal construction hours may also be required for activities involving construction over I-15, as discussed under Section 4.8.8, Impact Noise-1 of the Draft EIR. Mitigation Measure Traffic-6 restricts underground construction activities within roads to avoid peak commute periods. Underground work areas would be temporarily covered with steel plates and construction equipment and vehicles would be stored at a staging yard at night. Additional language has been added to Mitigation Measure Traffic-6, which requires SDG&E to quickly cover underground work areas with steel plates in the event of an emergency to open lanes and permit unimpeded evacuation; see response to comment B1-2 and General Response GR-12 for further discussion regarding emergency evacuation.

B7-24 One lane of traffic flow in either direction would remain open for the majority of construction. The EIR analysis states that construction of Alternative 5 would have a significant impact on the Pomerado Road LOS due to lane closures and the additional traffic generated during construction because the existing LOS is below standards. Mitigation Measure Traffic-6 requires that SDG&E avoid construction during peak commute hours to reduce wait times. Operation of the underground transmission line would require annual inspections which would occur aboveground and require traffic control. Each vault inspection would take less than a day and result in minimal delays. Roadways affected by lane closures during construction and operation would not substantially add to the idling time for vehicles traveling along the road as lane closures would be short in length and duration. Greenhouse gas emissions from additional vehicle idling time caused by lane closures during construction and operation of the underground transmission line would not significantly increase because lane closures would be short in length and duration.

B7-25 The Second San Diego Aqueduct is discussed in Section 4.6: Hydrology and Water Resources and analyzed under Impact Hydro-1 of the Draft EIR. Any impacts on the Second San Diego Aqueduct would be mitigated with implementation of Mitigation Measures Hydrology-1, Utilities-3, and Hazards-4, which would avoid potential impacts from dig-ins of a buried utility line through notifying utility companies, adjusting underground work locations, and uncovering existing utility pipelines. Table 4.17-4 of Draft EIR has been revised to list Second San Diego Aqueduct as a utility line in proximity to the underground portion of Alternative 5.

B7-26 The impact of Alternative 5 road closures on emergency access is addressed in response to comment B1-2. See response to comment B7-8 regarding the impact of pavement anomalies on traffic. See General Responses GR-12 and GR-13 for information regarding impacts on emergency access and traffic.

B7-27 MCAS Miramar was notified during both scoping and the publication of the Draft EIR. Alternative 5 is not located on MCAS Miramar property. MCAS Miramar was provided the opportunity to comment on the Draft EIR and provided a comment letter, A1. MCAS Miramar recommended coordination with the FAA for any objects in airspace and solicitation of comments the FAA and TRACON. A record of CPUC correspondence with TRACON is provided in Attachment 2: Agency Correspondences. See responses to comments A1-1 and A1-2.

See response to comment B7-17 regarding impacts on MCAS Miramar access.

B7-28 Table ES.7-1 is a comparison table between the Proposed Project and the alternatives. The table was not designed to provide specific details regarding Alternative 5 and cumulative impacts. Table 5.4-2 defines the contribution of Alternative 5 to cumulative impacts for each environmental issue. See responses to comments B7-6, B7-8, B7-11 through B7-22, and B7-24 for further information regarding biology, aesthetics, hydrology, traffic, fire/emergency evacuation, bicycle lanes, greenhouse gas emissions, and air traffic impacts from Alternative 5.

B7-29 See response to comment B7-12 regarding existing utilities and space requirements of the underground alignment proposed under Alternative 5. Cumulative impact analysis under CEQA requires consideration of whether a project's incremental effect is cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3). A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. "Other projects" include past, present and reasonably foreseeable future projects producing related or cumulative impacts. The Draft EIR's cumulative analysis for utilities and public services considered past, present, and reasonably foreseeable future projects located within the service area traversed by the Proposed Project and project alternatives (refer to Tables 5.2-1 and 5.4-1 of the Draft EIR) and concluded that impacts would be less than significant.

The commenter asserts that the new transmission line would prevent or greatly increase the difficulty of constructing new or upgraded utilities and utility systems along Pomerado Road; however, the commenter does not provide any evidence in support of this assertion or any specific projects that would be impacted in this manner. In any event, the impact of a project on future construction of other projects is not an impact which must be identified and analyzed under CEQA, which is concerned with the physical changes that a project will have on the environment and feasible mitigation measures and alternatives to reduce or avoid significant effects. Furthermore, it would be speculative, even if required, to evaluate the impact of the project on future construction projects which have not been specifically identified or proposed.

B7-30 Cumulative projects were identified within an approximately one-mile radius around alternative alignments similar to the Proposed Project, as discussed under Section 5.2.1 of the Draft EIR. Additional projects outside of this radius were also considered if they were determined to be relevant to the geographic scope of a particular environmental resource topic (e.g., air quality, traffic). See response to comment B2-2 for information regarding the SDG&E PSRP. Revisions to the description of the Carroll Canyon Community Center and the addition of Chabad Scripps Ranch Campus of Life expansion and the Fire Station 37 Annex to Table 5.4-1 are presented below. Figure 5.4-1 has also been revised to include the two additional cumulative projects. The revision to the existing project and addition of the two new projects do not change the cumulative impact analysis as the Alternative 5 contribution to cumulative impacts was already considered considerable for aesthetics, air quality, traffic, and noise. The alternative's contribution to cumulative impacts for the other resources areas would remain less than considerable with mitigation or less than considerable, as described in Chapter 5: Cumulative Impacts of the Draft EIR.

B7-31 The commenter has stated that the construction of Alternative 5 will have a "profound impact" on businesses, resulting in a loss of business potentially to the point of some business operations being discontinued following construction; however, the commenter offers no evidence to support these claims. Potential social and economic impacts on businesses are beyond the scope of CEQA, though the physical environmental effect of urban decay may be considered when substantial evidence supports its likelihood (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004)). In this instance, there is no substantial evidence that construction of Alternative 5 would cause urban decay, and the limited extent of road closures during business hours and peak commute periods would not preclude access to businesses along the proposed Alternative 5 alignment, as clarified in responses to comments B7-17 and B7-19 above.

Table 5.4-1 Cumulative Scenario Projects Near Alternative Alignments

No.	Project Name (Project Type)	Project Components	Location	Status	Alternative Affected
41	~~Carroll Canyon Commercial Center~~ Pending Mixed Use Development Project (Development)	Demolish existing facilities and redevelop with approximately 12,000 square feet of commercial retail space for shops and 260 multi-family units. ~~144,621 square feet of commercial retail space for shops, financial institutions, restaurants, and parking on a 9.5 acre site~~	9850 Carroll Canyon Road	Construction is anticipated to begin within the next two years.	Alternative 5
54	Chabad Scripps Ranch Campus of Life (Institutional)	Construct three multi-story dormitory buildings on the campus.	Chabad Center Driveway off of Pomerado Road	Construction would begin in 2015 or 2016.	Alternative 5
55	Fire Station 37 Annex (Public Services)	Construct a fire station to serve as an annex to existing Fire Station 37.	Intersection of Pomerado Road and Avenida Magnifica	Construction would begin in 2017.	Alternative 5

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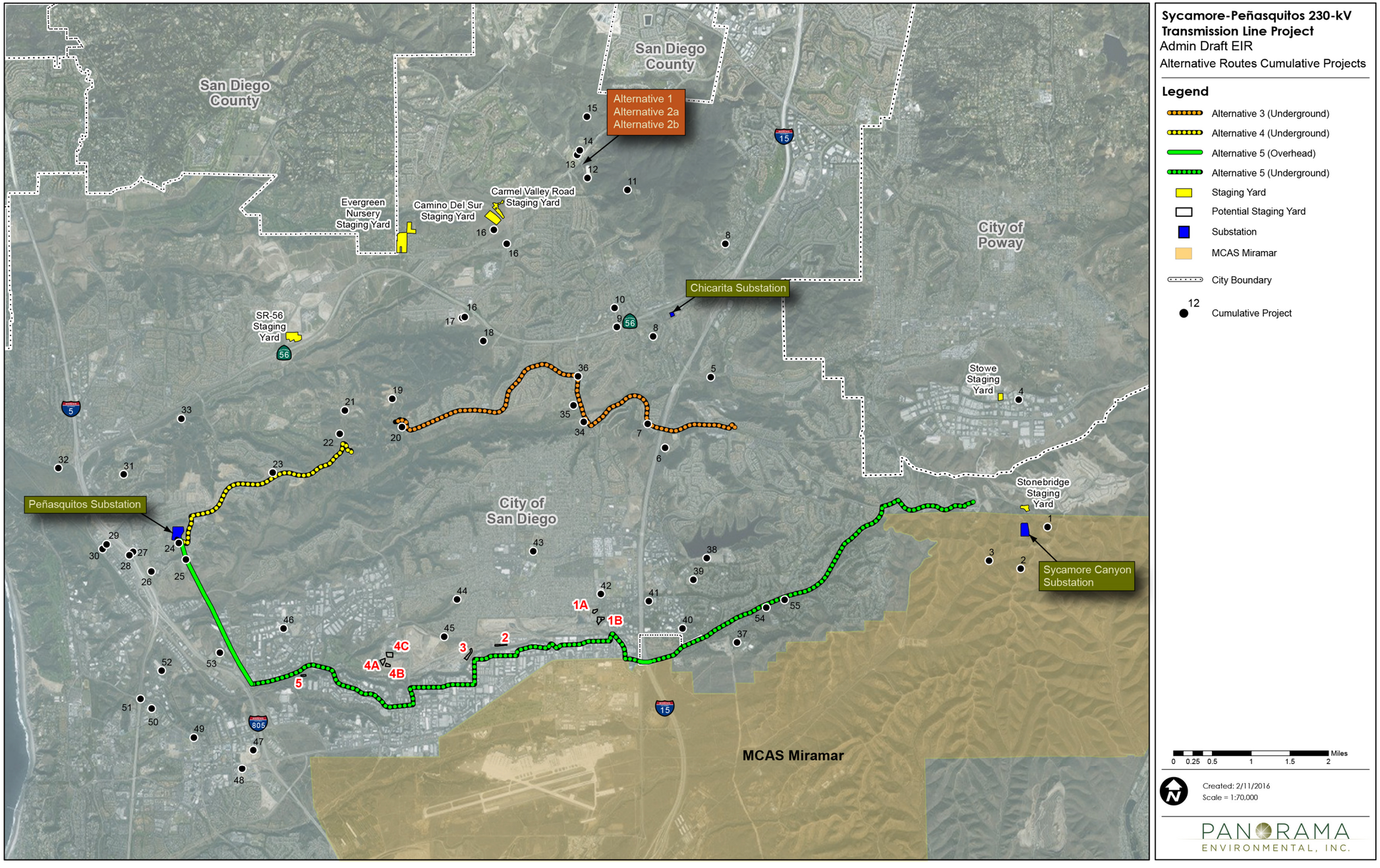
Figure 5.4-1 Cumulative Projects near Project Alternatives (Revised)



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B7-32 The alignment suggested in this comment is similar to the underground/overhead alignment considered in Alternative 20. Alternative 20 would traverse the operational quarries on overhead transmission lines. Construction within operational quarries may be infeasible. Refer to Appendix D: Alternatives Screening Report of the Draft EIR for further details regarding feasibility of Alternative 20. Alternative 20 would have greater impacts to traffic and hazards as compared to Alternative 5 and was therefore eliminated from further analysis in the EIR.

This comment additionally suggested that in conjunction with construction of Carroll Canyon Road, the overhead transmission line should be undergrounded. This suggested alternative would substantially increase noise, air emissions, and traffic as compared to the Proposed Project and Alternative 5 due to construction of an overhead transmission line and then reconstruction of the transmission line underground.

B7-33 See responses to comments above regarding specific Alternative 5 concerns and noticing. Alternative 5 is the Environmentally Superior Alternative for the reasons noted in Chapter 6: Comparison of Alternatives of the Draft EIR.

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