

### 3 COMMENTS AND RESPONSES

#### 3.5.3 Response to Letter D3: SDG&E

D3-1 SDG&E's comment states that the details of the Mission—Peñasquitos 230-kV transmission line project have yet to be determined. This information has been added to Chapter 5: Cumulative Impacts at the end of Section 5.2.3 as follows:

SDG&E is currently developing a proposed plan of service for the CAISO-approved Mission—Peñasquitos 230-kV transmission line and has not yet determined the final route or system configuration for the project. Load flow studies, engineering, and route development remain to be completed, and there is a possibility that the final plan of service will look significantly different than what was initially proposed by CAISO (SDG&E 2015b).

The same text has been added as a footnote in Section 3.5.6.1 in Chapter 3: Alternatives and in Section ES.5.4 in the Executive Summary of the Draft EIR.

D3-2 The California Coastal Commission was listed in Table 1.3-1 of the Draft EIR as the approving agency for a Coastal Development Permit for the construction of facilities within the California coastal zone. No change is required in the Draft EIR.

D3-3 The text on page ES-62 of the Draft EIR states the No Project Alternative would not meet most basic project objectives. To avoid redundancy, no change has been made to the Draft EIR to address this comment because it is already clear that the No Project Alternative does not meet most project objectives.

D3-4 The Mission—Peñasquitos 230-kV transmission line project is not considered part of the baseline for the Draft EIR analysis as suggested by the comment because it did not exist at the time of the publication of the NOP. (See CEQA Guidelines Section 15125(b) [setting forth requirements for description of baseline physical conditions]). The Mission—Peñasquitos project is, however, properly considered as part of the No Project Alternative because it is part of what would reasonably be expected to occur in the foreseeable future if the CPUC did not approve the Proposed Project or an alternative based on current plans. (See CEQA Guidelines Section 15126.6(e)(3)).

The Draft EIR also properly considers the Mission—Peñasquitos project in the cumulative impact analysis. Pursuant to CEQA Guidelines Section 15130(b)(1)(A), an EIR using the “list of projects” approach must consider all “probable future projects” that would produce related or cumulative impacts with the Proposed Project. CAISO has approved the Mission—Peñasquitos 230-kV transmission line but it has not yet been constructed; the project therefore qualifies as a probable future project. As stated by CAISO (2015), a portion of the Mission—Peñasquitos 230-kV transmission line would follow Proposed Project Segment D; therefore, the project would have impacts in the same physical area as the Proposed Project and is considered a cumulative project in the Draft EIR.

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There is no comparison of the No Project Alternative and the Mission—Peñasquitos 230-kV transmission line cumulative project in the Draft EIR because the analyses of No Project Alternative impacts and cumulative impacts examine two separate concepts. The analysis of cumulative impacts in Chapter 5 of the Draft EIR does not include an analysis of cumulative impacts of the No Project Alternative. CEQA does not require consideration of cumulative impacts from the No Project Alternative. Additionally, the No Project Alternative has been revised in accordance with comment D3-11 and SDG&E Response to Data Request #18 (see response to comment D3-11). Impacts from the No Project Alternative and cumulative impacts from the Mission—Peñasquitos 230-kV transmission line are not double-counted in the Draft EIR. The Draft EIR correctly presented the Mission—Peñasquitos project as part of the No Project Alternative and separately as a cumulative project. No change is required in the Draft EIR.

D3-5 Comment noted.

D3-6 The splice vault dimensions were revised in Chapter 2: Project Description as well as throughout the Draft EIR:

The splice vaults would measure about 24 feet long by 10 feet wide by ~~8~~ 10 feet deep.

The increased depth of the splice vaults would not affect any relevant significance conclusions made in the Draft EIR. Applicable mitigation measures regarding the geotechnical design of Proposed Project Segment B (Mitigation Measures Geology-1, Geology-2, and Geology-3) would mitigate for any impacts resulting from an increased depth of the vaults.

D3-7 The Draft EIR assumed that construction would affect up to 2 feet from the edge of all access roads because SDG&E indicated that access roads would require improvements that extend beyond the 14-foot maintained road width, particularly at turns. SDG&E did not provide information on where the access road improvements would occur to support a more detailed analysis so the CPUC conservatively assumed 2 feet. See responses to comments A2-6, D2-42, and General Response GR-15 regarding impacts from access road improvements and how they are calculated and considered in the Final EIR.

D3-8 The discussion of the Camino Del Sur staging yard has been revised in Section 2.3.3.1 of the Draft EIR as follows:

SDG&E has received permission from the City of San Diego to potentially use ~~up to 2.3 acres within~~ the 11.7-acre Camino Del Sur vacant parcel as a staging yard during construction, provided the land is vacant and available at such time. SDG&E is proposing to use up to 2.3 acres within the Camino Del Sur staging yard.

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D3-9 The possibility of adding shunt reactors at either Sycamore Canyon or Peñasquitos Substation has been added to the description of Alternative 3 in Chapter 3: Alternatives of the Draft EIR:

#### **Substations and Other Work Areas**

Alternative 3 would involve the same work at Sycamore Canyon, Peñasquitos and Chicarita Substations as the Proposed Project with the exception of the addition of shunt reactors at either the Sycamore Canyon or Peñasquitos Substation. Shunt reactors may need to be installed at either of these substations to address light load/high voltage issues caused by the longer underground alignment associated with Alternative 3. There would be no work at Encina Hub or San Luis Rey Substation and the Mission—San Luis Rey phase transposition would not occur.

These revisions would not create any new or substantially more severe significant impacts than what has previously been analyzed in the Draft EIR. A shunt reactor is a device that is used to absorb reactive power. Shunt reactors look very similar to transformers and would be indiscernible from the existing electrical equipment within the Sycamore and Peñasquitos Substations. No revisions have been made to the impact analyses in the Draft EIR.

D3-10 The comment that construction of Alternative 5 would create the possibility of an N-2 contingency is noted. The strategies suggested by SDG&E are reasonable to avoid an N-2 contingency that could arise should the CPUC approve Alternative 5. Refer to response to comment D2-12 regarding avoiding an N-2 contingency. Costs to ratepayers are not considered in the Draft EIR; however, cost will be considered during the CPUC decision-making process, as described in General Response GR-1.

The CAISO-approved project of splitting the existing TL23013 230-kV transmission line into two lines is noted. The CPUC also notes that SDG&E would need to find a different route for this project if the CPUC should approve Alternative 5.

It is noted that Alternative 5, unlike Alternatives 1 through 4, would introduce a common mode of failure in the power sources from Sycamore Canyon and Old Town/Silvergate Substations. See response to comment D2-12 regarding edits to the description of Alternative 5 in Chapter 3: Alternatives of the Draft EIR to address this common mode of failure.

If Alternative 4 were built, full build-out of Alternative 4 and the Mission—Peñasquitos 230-kV transmission line (assuming an alignment utilizing Segment D of the Proposed Project) would result in the full utilization of the 230-kV lattice steel towers (i.e., two 230-kV transmission lines on the same structures). If Alternative 5 were built, full build-out would likely require the same configuration currently described as the Proposed Project (i.e., replacing the existing H-frames with TSPs, transferring the two 69-kV power lines to the TSPs, and stringing the Mission—

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Peñasquitos 230-kV transmission line on the 230-kV lattice steel towers). Both of these configurations seem plausible if the CPUC were to approve construction of the Mission—Peñasquitos 230-kV transmission line project within Segment D of the Proposed Project. See response to comment D3-1 regarding the current status and uncertainty regarding the final route and design of the Mission—Peñasquitos Project.

The possibility of adding shunt reactors at either Sycamore Canyon or Peñasquitos Substation has been added to the description of Alternative 5 in Chapter 3: Alternatives:

#### **Substations and Other Work Areas**

Alternative 5 would involve the same work at Sycamore Canyon, Peñasquitos and Chicarita Substations as the Proposed Project with the exception of the addition of shunt reactors at either the Sycamore Canyon or Peñasquitos Substation. Shunt reactors may need to be installed at either of these substations to address light load/high voltage issues caused by the longer underground alignment associated with Alternative 5. There would be no work at Encina Hub or San Luis Rey Substation and the Mission—San Luis Rey phase transposition would not occur.

As noted in response D3-9 above, the shunt reactors would not create any new or more severe environmental impacts. No changes to the Draft EIR impact analysis are required to address these modifications to Alternative 5.

D3-11 In response to this comment, the CPUC prepared a data request to obtain further information from SDG&E regarding the definition of the No Project Alternative. SDG&E submitted information in Response to Data Request #18 and #21 regarding the upgrades that would need to occur if the Proposed Project were not constructed (SDG&E 2015b). SDG&E explained that construction of the Mission—Peñasquitos 230-kV transmission line project and Second Poway—Pomerado 69-kV power line project would be incremental to and not a substitute for the Proposed Project. SDG&E further explained that adding a shunt reactor to Sycamore Canyon Substation would not increase the current-carrying capability in the transmission network but rather shunt the flow of power elsewhere in the network. Adding a shunt reactor would therefore not help relieve congestion in the transmission system and would not help meet project objectives.

SDG&E listed several additional upgrades that would occur under a No Project scenario. These upgrades would not completely meet all project objectives and all NERC reliability criteria; however, they would help mitigate for the lack of a new 230-kV transmission line (the Proposed Project). These upgrades include:

- Addition of a second Miguel—Bay Boulevard 230-kV transmission line
- Upgrade of Miguel—Mission 230-kV transmission lines 1 & 2

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- Upgrade of Artesian—Bernardo 69-kV power lines 1 & 2
- Addition of a second Sycamore Canyon—Scripps 69-kV power line
- Upgrade of the Bernardo—Felicita Tap—Felicita 69-kV power line

Section 3.5.6 of the Draft EIR has been revised to re-define the No Project Alternative, as shown below. The shunt reactor was removed and the five upgrades listed by SDG&E were added to the No Project Alternative. The impact analysis of the No Project Alternative has been revised in Sections 4.1 through 4.17 of the Draft EIR to reflect the revisions shown below. Chapter 3: Alternatives and Chapter 6: Comparison of Alternatives have also been revised to reflect the revisions shown below.

Chapter 3: Alternatives has been edited as follows:

Under the No Project Alternative, construction and operation of the Proposed Project would not occur. However, as described in Chapter 1: Introduction, the Proposed Project is needed to maintain electrical system reliability in the absence of generation at SONGS. If the Proposed Project (or one or more of the retained Alternatives described above) is not approved by the CPUC, it is reasonable to assume that different electrical system improvement(s) would be implemented to avoid current and proposed overloads and maintain system reliability consistent with NERC reliability criteria. Upgrades to these lines or comparable electrical facilities would therefore be required under a No Project Alternative to avoid reliability violations. The No Project Alternative does not meet most or all project objectives. This section describes the ~~three~~ seven upgrades that are considered part of the No Project Alternative:

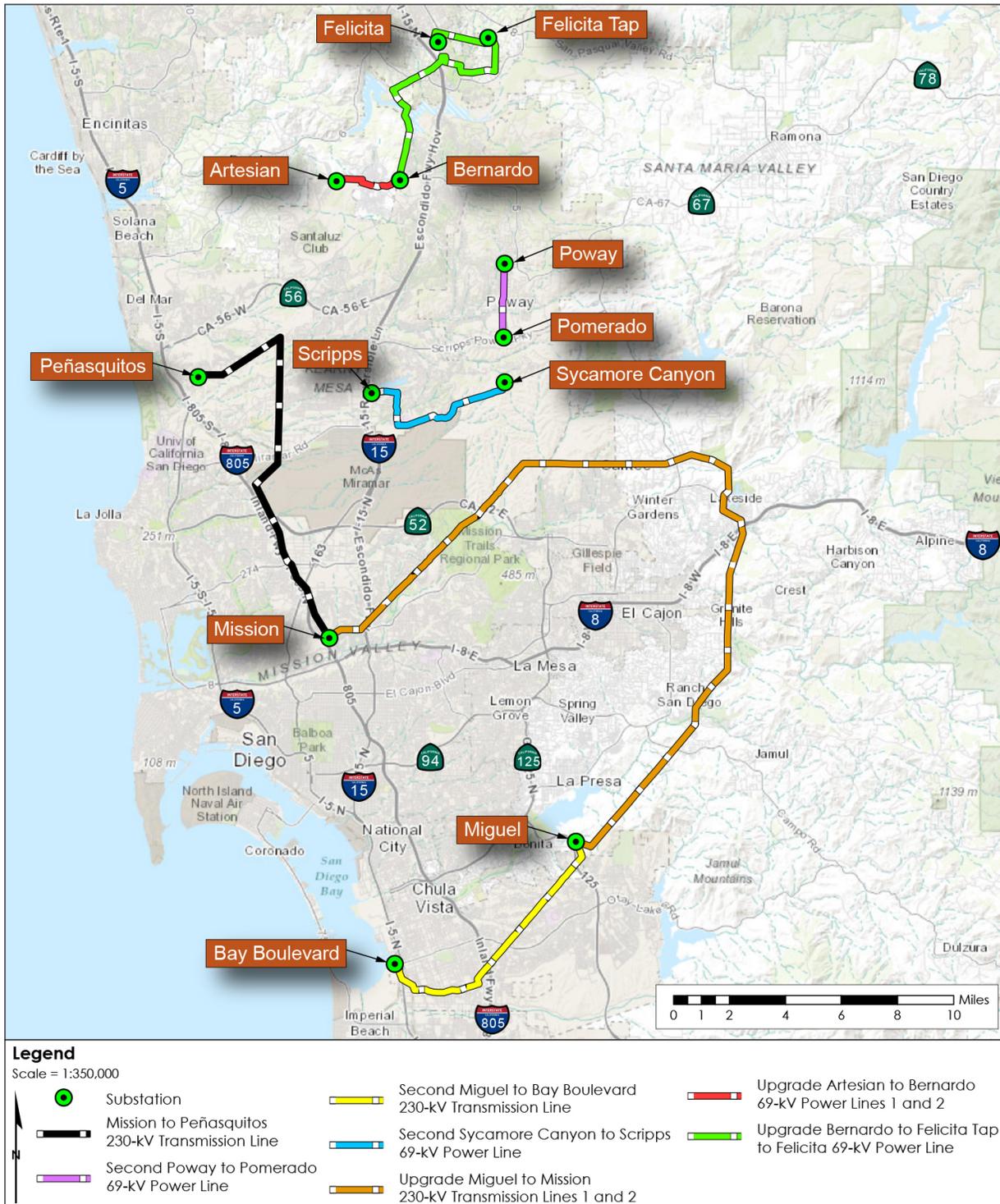
- New Mission—Peñasquitos 230-kV Transmission Line
- Second Poway—Pomerado 69-kV Power Line
- Second Miguel—Bay Boulevard 230-kV Transmission Line
- Second Sycamore Canyon—Scripps 69-kV Power Line
- Upgrade Miguel—Mission 230-kV Transmission Lines 1 and 2
- Upgrade Artesian—Bernardo 69-kV Power Lines 1 and 2
- Upgrade Bernardo—Felicita Tap—Felicita 69-kV Power Line
- ~~Series Reactor<sup>+</sup> at Sycamore Canyon Substation~~

The corridors for these upgrades are shown on Figure 3.5-5. The last five improvements were defined by SDG&E in rebuttal testimony (SDG&E 2015a) and response to comments on the Draft EIR and subsequent CPUC data requests (SDG&E 2015e, 2016a).

The Mission—Peñasquitos transmission line and Second Poway—Pomerado power line would be constructed even if the CPUC approves the Proposed Project or a project alternative because these projects were separately approved by CAISO. SDG&E would need to file an application with the CPUC for a Permit to Construct (50-kV to 200-kV power line) or a CPCN (greater than 200-kV

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Figure 3.5-5 No Project Alternative (Revised)



Source: ESRI 2016

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transmission line), as required under GO No. 131-D prior to construction of either of these projects. The CPUC would then evaluate the environmental impacts of these projects and define mitigation for those impacts as required under CEQA.

Section 6.5 of Chapter 6: Comparison of Alternatives has been edited as follows:

The No Project Alternative is described in Section 3.7. In the absence of the Proposed Project, SDG&E is obligated to maintain system reliability and would need to pursue actions to alleviate thermal overloads in the system. The events or actions that are reasonably expected to occur in the foreseeable future in the event the Sycamore—Peñasquitos 230-kV transmission line project is not approved include the following:

- New Mission—Peñasquitos 230-kV Transmission Line
- Second Poway—Pomerado 69-kV Line
- Second Miguel—Bay Boulevard 230-kV Transmission Line
- Second Sycamore Canyon—Scripps 69-kV Power Line
- Upgrade Miguel—Mission 230-kV Transmission Lines 1 and 2
- Upgrade Artesian—Bernardo 69-kV Power Lines 1 and 2
- Upgrade Bernardo—Felicita Tap—Felicita 69-kV Power Line
- ~~Install a series reactor at Sycamore Canyon Substation~~

Both the 15-mile-long Mission—Peñasquitos 230-kV transmission line and 2.6-mile-long Poway—Pomerado 69-kV line would be overhead. The No Project Alternative would require 17.6 miles of new overhead transmission and power lines compared with 13.3 miles of overhead transmission line for the Proposed Project. Table 6.5-1 compares the No Project Alternative with the Proposed Project for each environmental resource area.

Upgrades to the Miguel—Mission 230-kV transmission lines, Artesian—Bernardo 69-kV power lines, and Bernardo—Felicita Tap—Felicita 69-kV power line would involve removing old 230-kV or 69-kV conductor from existing transmission and power lines and stringing new conductor along the alignment within existing ROW. In a few locations, existing poles may not adequately support the new conductor. In these locations, existing poles would be removed and new poles would be constructed in approximately the same location.

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**Table 6.5-1 Comparison of the Proposed Project to the No Project Alternative**

Resource Area	Proposed Project	No Project Alternative	
Biological Resources	Comparison	<p><b>Preferred</b>  <del>Ranking = 2</del>  <u>Less impact on sensitive biological species and habitat due to fewer miles impacted by construction. Greater impacts to Preserve areas including habitat for special-status species and vernal pools</u></p>	<p><u>Ranking = 2</u>  <b>Preferred</b>  <u>Involves construction in the San Diego Wildlife Preserve and impacts to coastal California gnatcatcher, Arroyo toad, and Otay tarplant, San Diego fairy shrimp critical habitat.</u> Avoids construction within Black Mountain Ranch and Del Mar Mesa Preserves</p>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Aesthetics	Comparison	<p><b>Preferred</b>  <del>Ranking = 2</del>            Significant visual impact from installation and operation of overhead lines and TSPs in Segments A and D</p>	<p><u>Ranking = 2</u>  <b>Preferred</b>  <u>Increases the temporary and permanent visual impacts due to construction activities along 83 miles of SDG&amp;E ROW and 35 miles of new or additional power lines. Reduces the temporary and permanent visual impacts due to use of existing structures in 7.5 miles and installation of new structures in MCAS Miramar where there is low visual sensitivity; impacts would be the same in Segment D of the Proposed Project</u></p>
	Impact	<i>Significant and Unavoidable</i>	<i>Significant and Unavoidable</i>
Cultural Resources	Comparison	<p><b>Preferred</b>  <del>Ranking = 2</del>  <u>Less Greater</u> potential to encounter previously undiscovered resources due to <del>less more</del> earth disturbance</p>	<p><u>Ranking = 2</u>  <b>Preferred</b>  <u>Greater Less</u> potential to encounter cultural resources due to <del>more fewer</del> miles of new poles and pole replacements and <u>potential no</u> underground construction</p>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation

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Resource Area		Proposed Project	No Project Alternative
Paleontological Resources	Comparison	<p><b>Preferred</b>  <u>Ranking = 2</u></p> <p>Involves <del>less a greater amount</del> of earth disturbance and <del>reduced greater</del> associated potential to impact buried paleontological resources</p>	<p><u>Ranking = 2</u>  <b>Preferred</b></p> <p><del>Greater Less</del> potential to encounter cultural resources due to <del>more fewer</del> miles of new poles and pole replacements and <del>potential no</del> underground construction</p>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Geology, Soils, and Mineral Resources	Comparison	<p><b>Preferred</b>  <u>Ranking = 2</u></p> <p><del>Less Greater</del> potential for top soil loss due to <del>fewer miles + more mile</del> of pole replacements and new pole installations in undisturbed areas</p>	<p><u>Ranking = 2</u>  <b>Preferred</b></p> <p>Requires approximately <del>66 more miles of construction activities + less mile of pole replacements</del> resulting in <del>more less</del> loss of top soil and potential for erosion</p>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Hydrology and Water Resources	Comparison	<p><b>Preferred</b></p> <p>Fewer crossings of waterbodies and less potential to cause water quality impacts to impaired creeks</p>	<p>Ranking = 2</p> <p>Greater potential for water quality impacts due to additional crossings of Los Peñasquitos Creek and tributary waters and more pole replacements in proximity to creeks</p>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Transportation & Traffic	Comparison	<p><b>Preferred</b>  <u>Ranking = 2</u></p> <p><del>Less impact to level of service due to fewer miles of construction. Greater construction within roadways and temporary road closures</del></p>	<p><u>Ranking = 2</u>  <b>Preferred</b></p> <p><del>Greater impact to level of service throughout San Diego County due to greater miles of construction. Road and lane closures similar to Proposed Project from highway crossings and underground construction. Less trip construction within roadways due to overhead construction; decreased temporary closures</del></p>
	Impact	Significant and Unavoidable	Less than Significant with Mitigation

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Resource Area		Proposed Project	No Project Alternative
Noise	Comparison	<b>Preferred</b> Decreased permanent corona noise from installation of a portion of the 230-kV transmission line underground	Ranking = 2 Increased permanent corona noise from <del>11 +2</del> more miles of overhead 230-kV transmission line
	Impact	<i>Significant and Unavoidable</i>	<i>Significant and Unavoidable</i>
Land Use and Planning	Comparison	No preference	No preference
	Impact	No Impact	No Impact
Recreation	Comparison	<b>Preferred</b> <del>Ranking = 2</del> <u>Fewer facility closures at public parks due to fewer miles of construction.</u> <del>Greater temporary closure of public parks including Black Mountain Ranch Community Park and Sycamore Canyon Park</del>	<u>Ranking = 2</u> <b>Preferred</b> No facility closures at Black Mountain Ranch Community Park, Sycamore Canyon Park or trails in Segments A; <u>however, trail and facility closures at several parks throughout San Diego County.</u>
	Impact	<i>Significant and Unavoidable</i>	<i>Significant and Unavoidable</i>
Hazards and Hazardous Materials	Comparison	<b>Preferred</b> Fewer hazardous materials sites in the vicinity	Ranking = 2 Greater potential to encounter hazardous materials and create a hazard due to construction within MCAS Miramar and new structures near the runway
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Fire and Fuels Management	Comparison	<b>Preferred</b> Lower risk of igniting a wildfire due to less overhead construction near wildlands/fuel sources	Ranking = 2 Greater risk of igniting a wildfire due to greater amount of overhead transmission and power lines constructed near wildlands
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation
Air Quality	Comparison	<b>Preferred</b> <del>Ranking = 2</del> <u>Lower</u> <del>Greater</del> usage of diesel-powered construction equipment and <u>lower</u> <del>greater</del> associated emissions due to underground construction	<u>Ranking = 2</u> <b>Preferred</b> <u>Greater</u> <del>Lower</del> usage of diesel-powered construction equipment and <u>greater</u> <del>lower</del> associated emissions due to overhead construction
	Impact	Less than Significant with Mitigation	Less than Significant <u>with Mitigation</u>

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Resource Area		Proposed Project	No Project Alternative
Greenhouse Gas Emissions	Comparison	<b>Preferred</b> <b>Ranking = 2</b> <u>Lower</u> Greater-CO <sub>2</sub> e emissions from <u>underground</u> construction	<b>Ranking = 2</b> <b>Preferred</b> <u>Greater</u> Lower-CO <sub>2</sub> e emissions from <u>underground</u> construction
	Impact	Less than Significant with Mitigation	Less than Significant
Agriculture and Forestry	Comparison	<b>Preferred</b> No impacts to designated Farmland including Farmland of Statewide Importance	Ranking = 2 Impacts to Farmland of Statewide Importance
	Impact	Less than Significant with Mitigation	Less than Significant
Population and Housing	Comparison	No preference	No preference
	Impact	No Impact	No Impact
Utilities and Public Service Systems	Comparison	<b>Preferred</b> <b>Ranking = 2</b> Construction in roadways near buried utilities	<b>Ranking = 2</b> <b>Preferred</b> <u>Greater impacts to public services due to more miles impacted by underground and overhead construction. Avoids construction in roadways near buried utility pipelines</u>
	Impact	Less than Significant with Mitigation	Less than Significant with Mitigation

#### Conclusion

The No Project Alternative would not reduce any of the significant and unavoidable impacts of the Proposed Project. ~~on Aesthetics, Transportation and Traffic, and Recreation; however, the~~ The No Project Alternative would increase significant and unavoidable aesthetics, recreation, and permanent noise impacts due to more miles of overhead transmission line. The No Project Alternative ranks lowest among the Proposed Project and all alternatives considered. The No Project Alternative is environmentally superior to the Proposed Project. The No Project Alternative is not the Environmentally Superior Alternative because Alternative 5 would further reduce the long-term impacts of the Proposed Project on aesthetics and noise. Alternative 5 is the Environmentally Superior Alternative because it provides the greatest overall reduction of environmental impacts.

- D3-12 In addition to this comment, SDG&E submitted information regarding the Alternative 1 cable pole height with their response to Data Request #18 (data need #11). The CPUC acknowledges that the cable pole analyzed for Alternative 1 south of Carmel Valley Road was based on preliminary engineering. The cable pole height

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for Alternative 1 may be 210 feet, 50 feet taller than the 160-foot tall cable pole described in the Draft EIR. If Alternative 1 is approved by the CPUC and the final structure height is 200 feet or greater following completion of final engineering, SDG&E would be required to notify the FAA and obtain approval prior to installing the structure as required by CFR Title 14 Section 77.13.

The CPUC understands that larger specialized equipment, such as a crane, may be necessary for operation and maintenance of a cable greater than 180 feet in height and that such equipment may not fit within the fenced pad area surrounding the structure. In this case, equipment would be positioned within the southern lane of Carmel Valley Road, and partial lane closures and traffic control would be required during maintenance as stipulated in applicable City encroachment permits. The description of Alternative 1 has been revised in Chapter 3: Alternatives and Appendix D: Alternatives Screening Report of the Draft EIR to reflect a 210-foot tall cable pole. The impact analysis for Alternative 1 under Section 4.7.9.2 of the Draft EIR has been revised as follows to address this comment:

SDG&E maintenance and inspection activities for Alternative 1 would consist of annual inspections and as-needed maintenance of the pole and underground transmission line. Maintenance would be primarily conducted from within the fenced enclosure surrounding the cable pole; however, specialized equipment such as a crane may be needed to lift workers to the phase position due to the height and location of the cable pole. Such equipment would not fit in the fenced enclosure and would therefore be positioned on the southern side of Carmel Valley Road, which would require temporary lane closures and traffic control as required by City of San Diego encroachment permits. Because of the irregular nature and low activity level for inspection and maintenance of the transmission line, inspection and maintenance activities would not be a source of new traffic on area roads, nor would temporary lane closures substantially disrupt traffic circulation or conflict with an applicable traffic standard. Therefore, operation and maintenance of Alternative 1 would have a less than significant impact on LOS. No mitigation is required.

D3-13 In addition to this comment, SDG&E submitted information with their response to Data Request #18 (data needs 5 and 6) regarding the use of existing structures in the western overhead alignment of Alternative 5. Based on SDG&E's evaluation, the CPUC understands that the existing poles, in their current condition, would support the 230-kV transmission line and all-dielectric self-supporting (ADSS) communications cable in an underbuild position. Existing poles would not need to be replaced. Alternative 5 would be built as described in the Draft EIR; therefore, no changes have been made to the Draft EIR.

In addition, the CPUC understands that clearances in the western overhead alignment of Alternative 5 would meet CPUC General Order 95 standards based on

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available light detection and ranging (LiDAR) data; however, SDG&E will need to reevaluate the conductor and ADSS clearances once updated LiDAR data are obtained and once the ongoing Caltrans work is completed. Analysis of updated LiDAR data may result in minor design refinements when final engineering is completed. The CPUC acknowledges that minor design refinements may affect the design schedule for Alternative 5.

- D3-14 SDG&E provided the approximate alignment of the 230-kV transmission line in the western overhead alignment of Alternative 5 prior to the Draft EIR; however, existing structure locations for the alignment were not provided. The CPUC identified the approximate locations of existing structures to support the 230-kV line using aerial and street view imagery from GIS and cross section diagrams provided by SDG&E. The heights of existing structures were not addressed in the analysis of Alternative 5 because it was assumed that those structures would not be modified under Alternative 5. See response to comment D3-13 regarding the use of existing structures. The revised location of the Alternative 5 CC MM PP cable pole shown on Exhibit 9 of Attachment B is approximately 100 feet northwest of the CC MM PP cable pole identified in the Draft EIR. The cable pole relocation does not modify the impacts of the cable pole or Alternative 5. The baseline environmental conditions of the area and impacts of the cable pole at the revised location are consistent with the analysis of Alternative 5 impacts presented in the Draft EIR. No changes are required in the Draft EIR to reflect the cable pole relocation.

The CPUC understands that minor work area refinements may occur following final engineering should the CPUC approve Alternative 5. See response to comment D2-8 regarding minor project changes as a result of final engineering.

- D3-15 The CPUC reviewed SDG&E's request to consider additional staging yards that may be used during construction of Alternative 5. Subsequent to this comment, the CPUC requested information on specific staging yard locations and activities in response to this comment and the staging yard locations provided in Attachment B, Exhibit 11 of SDG&E's comment letter. In response to CPUC Data Request #22, SDG&E defined specific staging yard areas for Alternative 5. The Alternative 5 staging yards would be located on previously disturbed lands, including graded and paved areas and areas within active quarries. SDG&E proposed these staging yards because they would be located considerably closer to the Alternative 5 underground alignment (within 0.5 mile) than the Proposed Project staging yards (between 0.6 and 7 miles from the underground alignment). The Alternative 5 staging yards would be used in conjunction with the Proposed Project staging yards should the CPUC approve Alternative 5. The Alternative 5 staging yards would be used for materials storage and equipment staging for construction of the underground transmission line; these staging yards would not be used as helicopter landing areas.

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The Alternative 5 staging yards have been incorporated into the Final EIR, and a discussion of impacts from use of these staging yards has been incorporated into each impact section of the Draft EIR (Sections 4.1 through 4.17), as appropriate. Use of the Alternative 5 staging yards would not result in any new impacts or increase the severity of a previously analyzed impact. Use of the Alternative 5 staging yards would result in similar impacts to use of the staging yards defined for the Proposed Project in Section 2.3.3.1 of the Draft EIR; consequently, the same APMs and mitigation measures that would reduce impacts of the Proposed Project staging yards would reduce impacts of the Alternative 5 staging yards. No revisions have been made to Section 4.9: Land Use and Planning or Section 4.12: Fire and Fuels Management because the addition of the Alternative 5 staging yards would have no impact on Land Use and Planning or Fire and Fuels Management.

Chapter 3: Alternatives, Section 3.5.5 of the Draft EIR has been revised to describe the Alternative 5 staging yards as follows:

#### Staging Yards and Materials Storage

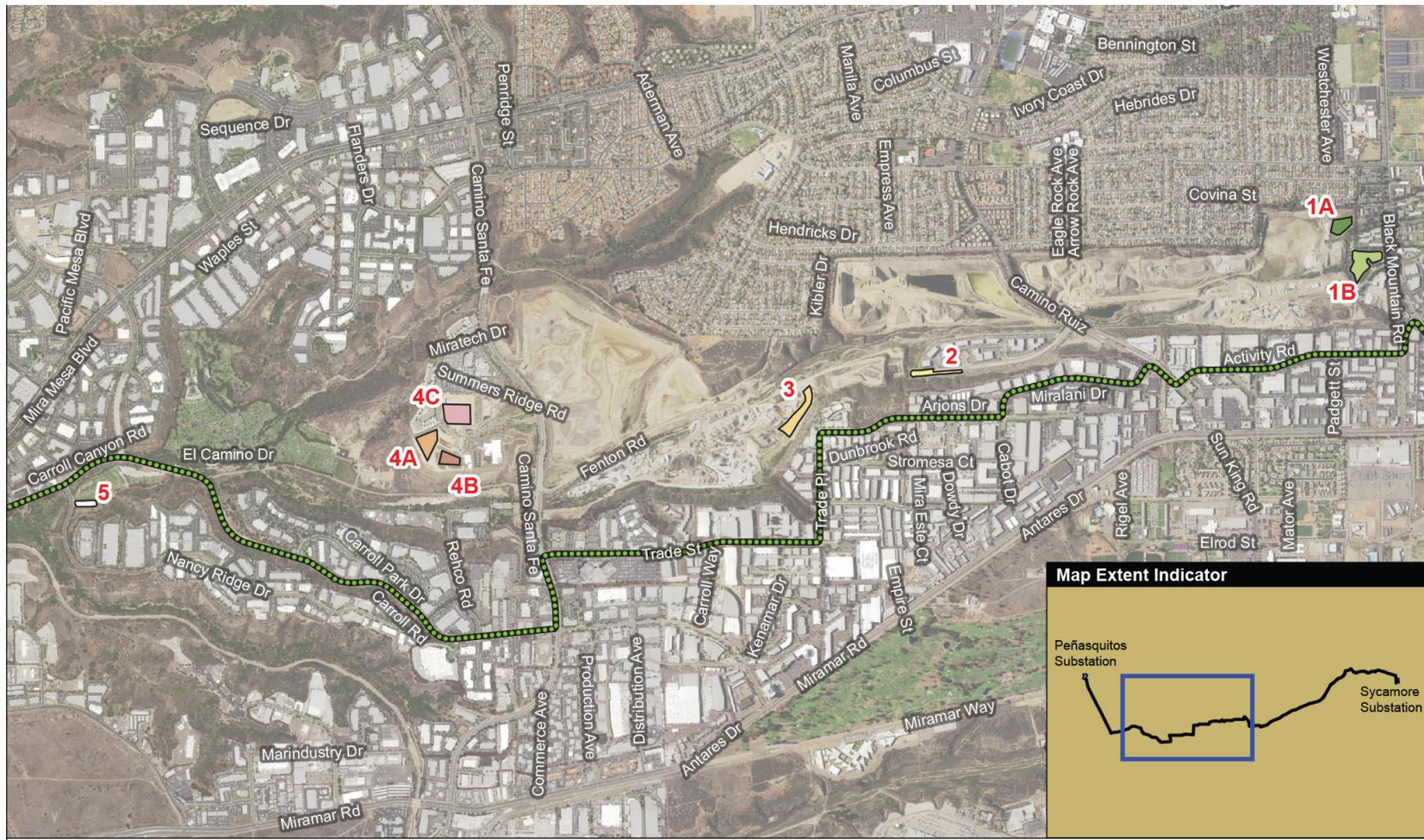
Alternative 5 ~~would~~ could utilize the same staging yards and materials storage areas as the Proposed Project and up to eight additional staging yards for Alternative 5 equipment staging and materials storage (SDG&E 2016). The Alternative 5 staging yards locations are shown on Figure 3.5-5. Table 3.5-3 lists the staging yards and the acreage of each yard. The Alternative 5 staging yards would be used for materials storage during Alternative 5 underground transmission line construction activities (trenching, vault installation, and cabling). Helicopter activities (landing and fueling) would not occur at these staging yards; Proposed Project staging yards would be used where helicopter activities are required. Spare underground PVC conduit may be temporarily stored along roadways during construction.

**Table 3.5-3 Alternative 5 Staging Yards**

Staging Yard	Acres
<u>1A – Conrock</u>	<u>1.43</u>
<u>1B – Conrock</u>	<u>2.98</u>
<u>2 – Carroll Canyon Road</u>	<u>1.25</u>
<u>3 – Hanson Aggregates</u>	<u>2.62</u>
<u>4A – Summers Ridge Road</u>	<u>1.16</u>
<u>4B – Summers Ridge Road</u>	<u>1.98</u>
<u>4C – Summers Ridge Road</u>	<u>2.95</u>
<u>5 – Sorrento Canyon Golf Center</u>	<u>0.73</u>
<b><u>TOTAL</u></b>	<b><u>15.10</u></b>

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**Figure 3.5-5 Alternative 5 Staging Yards**



SOURCES: Esri 2016, SDG&E 2016, and Panorama Environmental, Inc. 2016

Scale: 1:30,000

<p><b>LEGEND</b></p>	<p>Alternative 5: Pomerado Road to Miramar Area North Combination Underground/Overhead Alternative (underground)</p>	<p><b>Alternative Sites</b></p> <p>1A </p> <p>1B </p> <p>2 </p> <p>3 </p>	<p>4A </p> <p>4B </p> <p>4C </p> <p>5 </p>
	<p>0 0.25 0.5 0.75 1 Miles</p> <p><b>PANORAMA</b> ENVIRONMENTAL, INC.</p>		

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The summary of Alternative 5 included in each impact section of the Draft EIR (Sections 4.1 through 4.17) has been revised to include the Alternative 5 staging yards as follows:

Alternative 5 would avoid construction within the Proposed Project alignment with the exception of approximately 3,400 feet of existing SDG&E ROW in Segment A connecting to the Sycamore Canyon Substation. SDG&E may use up to eight other staging yards during construction of Alternative 5 in addition to the Proposed Project staging yards. The Alternative 5 staging yards would be located within the Conrock and Hanson Aggregates Pacific Northwest quarries north of the Alternative 5 underground alignment, within the cul-de-sac west of Birch Canyon Place, off of Summers Ridge Road, and behind the Sorrento Canyon Golf Center. This alternative is described in more detail in Chapter 3: Alternatives.

D3-16 See responses to comments D2-3, D2-7, D2-18, D2-26, and D2-32 regarding the possible delays in construction schedules for the Proposed Project and alternatives. It is noted that the engineering completed for the underground portion of the Proposed Project could not be applied to the engineering of the alternatives. It is also noted that the suggested design change on Alternative 5 regarding the crossing of I-15 may affect the construction schedule of Alternative 5.

The comment regarding anticipated delays in the construction schedule due to mitigation requirements and City of San Diego requirements is noted. As required by CEQA, feasible mitigation measures were described as necessary to reduce the significant impacts of the Proposed Project and the alternatives. The CPUC has no authority over requirements imposed by the City of San Diego.

D3-17 The Executive Summary and Chapter 6: Comparison of Alternatives of the Draft EIR note that the No Project Alternative would not meet most basic project objectives. No additions to these sections have been made to avoid redundancy.

Section 3.5.6 in Chapter 3: Alternatives has been revised to state that the No Project Alternative would not meet most basic project objectives, as shown in response to comment D3-11.

See response to D3-11 regarding revisions to the description of the No Project Alternative in the Draft EIR. Based on these revisions, the ranking of the No Project Alternative has been lowered (See General Response GR-7).

D3-18 The series reactor has been removed from the description of the No Project Alternative. See response to comment D3-11 for further details.

D3-19 Comment noted.

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D3-20 It is noted that the impacts of a project on biological resources cannot always be precisely predicted due to many factors such as species migratory patterns and habitat changes from wildfire, flood, or drought. While these factors admittedly create uncertainty about the precise type and extent of biological impacts that would result from the Proposed Project, the Draft EIR describes and analyzes the significant effects of the Proposed Project consistent with the requirements of CEQA. CEQA requires that an EIR be prepared with a sufficient degree of analysis to provide decision-makers with the information needed to make an informed decision concerning the project's environmental consequences. This requirement is subject to the "rule of reason," under which an EIR cannot be held inadequate simply because data used are not exact.

SDG&E may make minor modifications to the Proposed Project or an alternative during final design that could reduce or avoid impacts defined in the Draft EIR as noted in responses to comments D2-42 and General Response GR-15.

D3-21 The Biological Technical Report (Busby 2014a), used to prepare SDG&E's PEA, considered bird species on the CDFW watch list and plant species with a CRPR of 3 or 4 as special-status species (refer to Table 1 in Busby 2014a). The Biological Technical Report was considered when determining species status in the Draft EIR.

The status of avian species can change during the project approval process and during construction. Birds on the CDFW watch list: (1) are not on the current list of species of special concern but were on previous lists and have not been State listed under the California Endangered Species Act; (2) were previously State or federally listed and now are on neither list; or (3) were on the list of "Fully Protected" species. Birds on the CDFW watch list were included on the special-status species list in the Draft EIR given the sensitivity of their status and the likelihood that their status could change prior to project construction.

The California Native Plant Society (CNPS) provides the following rationale for inclusion of plant species with a CRPR rank of 3 or 4 in environmental documents related to CEQA:

All of the plants constituting California Rare Plant Rank 3 meet the definitions of the California Endangered Species Act of the California Department of Fish and Game Code, and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380.

Some of the plants constituting California Rare Plant Rank 4 meet the definitions of the California Endangered Species Act of the California

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Department of Fish and Game Code, and few, if any, are eligible for state listing. Nevertheless, many of them are significant locally, and we strongly recommend that California Rare Plant Rank 4 plants be evaluated for impact significance during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, based on CEQA Guidelines §15125 (c) and/or §15380 (CNPS 2015).

Consistent with the CNPS rationale, plant species with a CRPR rank of 3 or 4 were included on the special-status species list in the Draft EIR.

The definition of special-status species includes bird species on the CDFW watch list and plant species with a CRPR of 3 or 4; therefore, no changes are required in the Draft EIR.

D3-22 The list of initial surveys in Section 4.1.2 includes the biological reconnaissance surveys conducted by Busby Biological in late summer/fall 2013. The “Focused special-status plant and wildlife surveys in late summer/fall 2013 (Busby 2014a)” are the biological reconnaissance surveys conducted by Busby Biological in later summer/fall of 2013. No changes are required in the Draft EIR.

D3-23 The list of databases in Section 4.1.2 has been revised to clarify that the San Diego San BIOS database was used to identify potential sensitive habitats, special-status plant species, and special-status wildlife species in the vicinity of the Proposed Project. The text in Section 4.1.2 has been revised as follows:

The following databases listed below were also reviewed to identify potential sensitive habitats, special-status plant species, and special-status wildlife species in the vicinity of the Proposed Project:

- California Native Plant Society Electronic Inventory of Rare and Endangered Vascular Plants of California
- [County of San Diego SanBIOS database](#)
- SanGIS database
- San Diego Natural History Museum

D3-24 Surveys for the Camino Del Sur staging yard were conducted after the general plant and wildlife surveys, focused plant and wildlife surveys, and jurisdictional delineations were performed. The timeline for the Camino Del Sur surveys has been clarified in response to this comment in Section 4.1.2 of the Draft EIR:

#### **Surveys**

Initial surveys (habitat assessments and focused surveys) were performed to determine the baseline biological resource conditions within the Proposed Project area. Initial surveys were performed for the following Proposed Project components:

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- Segments A, B, C, and D of the Proposed Project
- Stonebridge staging yard
- Stowe staging yard
- ~~Camino Del Sur staging yard~~

Additional work areas were added to the Proposed Project after the general plant and wildlife surveys, focused plant and wildlife surveys, and jurisdictional delineations were performed. Habitat assessments, focused species surveys, and wetland delineations were performed for the following additional work areas:

- Encina Hub
- Mission—San Luis Rey Phase Transposition
- Evergreen Nursery staging yard
- SR-56 staging yard
- Carmel Valley Road staging yard
- Camino Del Sur staging yard
- Additional or modified access roads
- Additional or modified stringing sites
- SDG&E modified eastern cable pole location

D3-25 The number of vegetation communities identified within the BSA has been revised in Section 4.1.3.1 consistent with Table 4.1-2 as follows:

#### **4.1.3.1 Proposed Project Setting**

A total of ~~25-26~~ vegetation communities and other land cover types were identified within the BSA. Table 4.1-2 provides a summary of the acreages of these communities and land cover types by Proposed Project component. Descriptions for these vegetation communities are provided in Appendix G, Table G-1, and maps of the vegetation communities are provided in Appendix G, Figure G-1.

D3-26 Section 4.1.3.2 has been revised in response to this comment. The reference to the number of USGS quadrangles that were sampled based on the literature review and database queries is updated consistent with Table 4.1-1. The text in Section 4.1.3.2 has been revised as follows:

A total of 144 special-status plant species have potential to occur within the ~~10-17~~ USGS quadrangles sampled based on the ~~literature~~ literature review and database queries.

All other references that stated 10 USGS quadrangles in the Draft EIR have been revised to 17 USGS quadrangles in the Final EIR.

D3-27 The CPUC acknowledges that the Draft EIR defines the potential for occurrence of special-status plants differently from the Biological Technical Report and PEA. The potential for special-status plants to occur in the Proposed Project area reflects local

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biologist knowledge and experience with these species in the area (refer to Chapter 8: Report Preparation of the Draft EIR). Local biologist knowledge of the area was necessary to define special-status plant species with potential to occur in the area due to the drought conditions at the time of surveys and because some special-status species (e.g., thread-leaved brodiaea) do not consistently bloom every year. Therefore, the surveys for special-status plants cannot be relied upon to identify all special-status plants that may occur in the Proposed Project area.

The Draft EIR includes the results of focused special-status plants surveys for all work areas, including Encina Hub. Section 4.1.2 of the Draft EIR describes all of the surveys that were reviewed to perform the analysis in the Draft EIR. Table 4.1-3 of the Draft EIR shows the results of the surveys. For example, seaside cistanthe and western dichondra were documented as present at Encina Hub, as indicated in Table 4.1-3. These tables and the Draft EIR text have been updated to reflect the results of surveys submitted by SDG&E in comments on the Draft EIR.

Plants species with a CRPR of 3 or 4 will remain classified as special-status species (see response to comment D3-21 above).

- D3-28 The CPUC agrees with the USFWS assessment that that vernal pool fairy shrimp are not known to occur within the vicinity of the Proposed Project (USFWS 2005). References in the Draft EIR to vernal pool fairy shrimp have been revised globally to show that vernal pool fairy shrimp are absent from the Proposed Project area.
- D3-29 Although no burrowing owl individuals were observed during the protocol level survey, there is potential for burrowing owl to occur within the Proposed Project area due to the presence of suitable habitat. Suitable habitat and known nearby occurrences of the species are considered in the CPUC's determination of the potential for a species to occur within an area. The protocol level survey is not sufficient to determine that burrowing owl will be absent from the Proposed Project site during project construction and operation (several months or years after the surveys were completed). Wildlife species including burrowing owl move and use different habitat areas at different times. The absence of a species in a location is not proof that the species will not occur there in the future. The methodology used to determine the potential for a species to occur is described in Section 4.1.3.2 of the Draft EIR. Table G-3 in Appendix G: Biological Resources Supporting Information of the Draft EIR describes the potential for burrowing owl to occur in the Proposed Project area, including the rationale for that determination. No changes are required in the Draft EIR for this species.
- D3-30 Although no Least Bell's vireo individuals were observed during the protocol level survey, there is potential for Least Bell's vireo to occur within the Proposed Project area due to the presence of suitable habitat. Suitable habitat and known nearby occurrences of the species are considered in the determination of the potential for a

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species to occur within an area as presented in the Draft EIR. The protocol level survey is not sufficient to determine that Least Bell's vireo will be absent from the Proposed Project site during project construction and operation. Wildlife species including Least Bell's vireo move and use different habitat areas at different times. The absence of a species in a location is not proof that the species will not occur there in the future. The methodology used to determine the potential for a species to occur is described in Section 4.1.3.2 of the Draft EIR. Table G-3 in Appendix G: Biological Resources Supporting Information of the Draft EIR describes the potential for Least Bell's vireo to occur in the Proposed Project area, including the rationale for that determination. No changes are required in the Draft EIR for this species.

D3-31 See response to comment D1-2 regarding the CPUC's decision not to rely on the NCCP to mitigate impacts of the Proposed Project or an alternative. As described in response to comment D1-2, the Draft EIR does not preclude the use of the NCCP. The text at the end of Tables 4.1-3 and 4.1-9 of the Draft EIR has been revised to clarify that the NCCP may be inapplicable:

NCCP = Current SDG&E Natural Community Conservation Plan Covered Species (Subregional NCCP coverage ~~may is assumed to~~ be inapplicable; see Section 4.1.2.3)

D3-32 The number of USGS quadrangles that were sampled based on the literature review and database queries is updated in Section 4.1.3.3 as follows:

A total of 129 special-status wildlife species have potential to occur within the ~~10~~ 17 sampled USGS quadrangles based on the ~~literature~~ literature review and database queries. Of these 129 species, nine are present in the BSA, 48 have moderate or high potential to occur, and 72 are either absent or have low potential to occur (or are migratory only or winter visitors that do not breed in the BSA).

D3-33 The potential for the coastal California gnatcatcher to occur was updated from high potential to occur at the Encina Hub to present at the Encina Hub, according to protocol surveys conducted in February and March 2015 (Busby 2015d). Section 4.1.3.3 of the Draft EIR has been revised as follows:

~~There is a high potential for the coastal California gnatcatcher to occur in the Encina Hub site because this site supports the species' Diegan coastal sage scrub habitat. Coastal California gnatcatcher are present within the Encina Hub Site (Busby 2015h).~~ There is very low potential for this species to occur at Mission—San Luis Rey Phase Transposition work areas because of limited suitable habitat. This species is considered absent from the Evergreen, Camino Del Sur, Carmel Valley Road, and SR-56 staging yards because there is no suitable habitat for this species.

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Tables 4.1-3 and 4.1-9 in Section 4.1: Biological Resources, Table G-3 in Appendix G: Biological Resources Supporting Information, and the impact analysis concerning Encina Hub of the Draft EIR have also been revised to reflect the presence of coastal California gnatcatcher. The presence of coastal California gnatcatcher does not change the significance conclusions or applicable mitigation measures in the Draft EIR. The Draft EIR impact analysis assumed that there would be an impact on coastal California gnatcatcher and its habitat because the species had a high potential to occur in the Proposed Project area. The Draft EIR included mitigation for impacts on coastal California gnatcatcher at Encina Hub. The Draft EIR mitigation and assumed impact to the species is consistent with the recent observations of the species during surveys.

D3-34 The additional information about when burrowing owl wintering surveys will be performed at the Mission—San Luis Rey Phase Transposition site and Carmel Valley Road staging yard has been added to Section 4.1.3.3 of the Draft EIR (see response to comment A2-3 for revisions to the text). The additional information about surveys for burrowing owl in all other work locations, the presence of suitable habitat, and the potential for burrowing owl to occur has not been revised as suggested because this information was already included in the Draft EIR. Impacts to burrowing owl were addressed through the mitigation in the Draft EIR.

D3-35 The text in the Vernal Pools and Road Pools portion of Section 4.1.3.6 was modified to clarify that road pools are considered potential jurisdictional features. The text in Section 4.1.3.6 of the Draft EIR has been revised as follows:

#### Vernal Pools and Road Pools

In addition to the jurisdictional features described above, other jurisdictional features (vernal pools ~~and road pools~~ and potential jurisdictional features (road pools)) were mapped in Segments C and D of the Proposed Project during CPUC’s field verification of the wetland delineation, but the areas for these jurisdictional features were not recorded (Helix 2015a).

D3-36 Table 4.1-5 of the Draft EIR has been modified to clarify that critical habitat for coastal California gnatcatcher is not located within the Encina Hub work site. This change is consistent with page 72057 of the Federal Register, which exempts SDG&E ROW from coastal California gnatcatcher critical habitat. The text in Table 4.1-5 of the Draft EIR has been revised as follows:

**Table 4.1-5 Proximity of Critical Habitat to Proposed Project**

Species	Distance from Proposed Project Alignment/Component
Coastal California gnatcatcher <i>Polioptila californica californica</i>	Located <u>approximately 1 mile east of</u> <del>within</del> the Encina Hub work area

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D3-37 See response to comment D3-36. Critical habitat for coastal California gnatcatcher is exempt within SDG&E ROW, including within the Encina Hub work site. Figure 4.1-2 of the Draft EIR has been modified to show that critical habitat is not located within the Encina Hub work area, as shown below.

D3-38 Additional text has been added to the California Fish and Game Code portion of Section 4.1.4.2 to clarify that SDG&E would follow the new draft Fish and Game Code regulations if they are adopted. The text in Section 4.1.4.2 of the Draft EIR has been revised as follows:

#### **California Fish and Game Code**

California Fish and Game Code requires State agencies to comply with regulations that promote the protection and conservation of threatened and endangered species. Regulations in place include:

- **California Species Preservation Act.** Provides for the protection and enhancement of listed species in California
- **Raptor Protection.** Prohibits killing or raptor species and destruction of raptor nests
- **Protection for Birds.** Makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird; it is also unlawful to take possess or destroy of birds of prey or their nests or eggs; CDFW prepared draft regulations (published August 14, 2015) to guide its implementation of Fish and Game Code Sections 3503 and 3503.5, which prohibits the take, possession, or destruction of bird nests or eggs. SDG&E would follow the regulations guiding Fish and Game Code Sections 3503 and 3503.5 during implementation of the project, if the draft regulations are adopted.

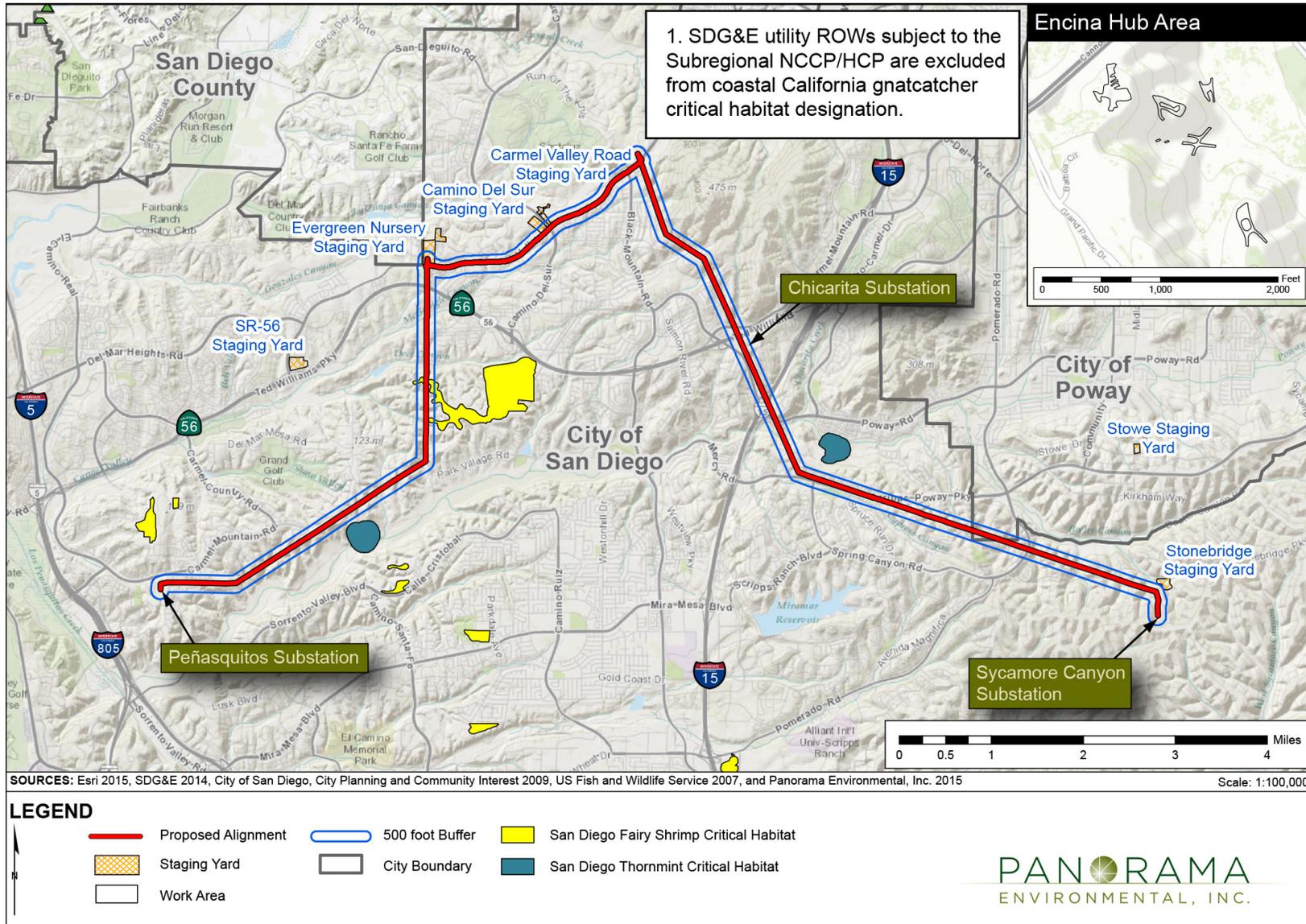
D3-39 See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project or alternatives. No changes are required in the Draft EIR.

D3-40 The text in Section 4.1.4.2 has been modified to clarify that federal take authorization through new project-specific ESA Section 10 and CESA Section 2081 permits is not anticipated and would only occur if the current NCCP cannot be applied or if the amended NCCP is not available during construction. The text in Section 4.1.4.3 of the Draft EIR has been revised as follows:

In lieu of utilizing the current or an amended NCCP If the current NCCP cannot be used because take is unavailable or if the amended NCCP is not available during construction, federal take authorization would occur through new project-specific ESA Section 10 and CESA Section 2081 permits and authorizations.

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Figure 4.1-2 Critical Habitat within the Proposed Project Vicinity (Revised)



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D3-41 Implementation of the QCB HCP works in concert with the 1995 Subregional NCCP to minimize impacts to QCB as described in the QCB HCP, Section 3.2: Actions to Minimize Impacts in the SDG&E QCH HCP:

The QCB protocols listed below are designed to work in concert with, and supplement, the existing protocols that have been incorporated into SDG&E activities as a result of their existing 1995 Subregional Plan that covers 110 species but not QCB. The protocols established by the 1995 Subregional plan will be followed for QCB along with the protocols below in order to provide additional minimization of impacts to the species. Should the 1995 Subregional Plan become ineffective (i.e., is no longer being implemented), the protocols therein will still be implemented whenever a covered activity takes place in QCB habitat.

Section 4.1.3.4 of the Draft EIR has been revised as follows to provide clarification:

The SDG&E's Low-effect HCP for the QCB was approved in May 2007 and authorizes incidental take of federally endangered QCB. The HCP for the QCB authorizes the loss of 33 acres of QCB habitat. The HCP requires SDG&E to implement general and QCB-specific operational protocols to avoid ~~or~~ and minimize take of QCB. The QCB HCP requires SDG&E to implement the protocols established in and relies on the 1995 Subregional NCCP. However, the HCP states that should the 1995 Subregional NCCP become ineffective (i.e., is no longer being implemented); the protocols therein will still be implemented whenever a covered activity takes place in QCB habitat. Therefore, SDG&E may rely upon the Subregional NCCP for take authorization for covered activities associated with the Proposed Project as it relates to the QCB.

D3-42 APM BIO-1 has been modified to reflect SDG&E's requested change to this APM. It is noted that this modification does not obviate the need for pre-activity surveys consistent with Mitigation Measure Biology-1c. See response to comment D3-27 for further information regarding the potential for special-status plants to occur in the Proposed Project area. APM BIO-1 has been revised as follows:

Implementation of the following measures will ensure impacts to special-status plant species remain less than significant:

- Prior to construction, SDG&E shall retain a qualified biologist to conduct focused, special-status plant surveys during the spring and summer 2015 in suitable habitats where focused plant surveys were not previously conducted. 2014 in all habitats that may support the special-status plant species with a potential to occur in the Proposed Project Survey Area.
- Locations of special-status plants shall be identified and inventoried.
- The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species.

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- Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated ~~though~~ through off-site land preservation, plant salvage, transplantation, or other appropriate methods as determined by the qualified biologist. Alternatively, if the special-status plant species in question is a SDG&E Subregional NCCP covered species, mitigation consistent with measures established in the NCCP and discussed in the SDG&E Subregional NCCP, above, shall be provided.

D3-43 The CPUC cannot rely on SDG&E's NCCP to mitigate impacts of the Proposed Project or an alternative. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts. No changes are required in the Draft EIR.

D3-44 The Draft EIR provides background information on how the CPUC determined that additional impacts could occur from access roads and why the impact acreages provided by SDG&E differ from the impact acreages calculated by the CPUC. The background information is relevant and leads to a subsequent discussion of how the CPUC calculated impacts from access roads. No changes are required in the Draft EIR.

D3-45 See response to comment D2-42 and General Response GR-15 regarding impacts from access road improvements. The access road impacts are revised as shown in General Response GR-15 to account only for those impacts that could occur beyond the 14-foot-wide maintained access road. General Response GR-15 clarifies what is considered an impact from access road improvements. The impacts of access road improvements have been revised in the Final EIR as shown in General Response GR-15.

D3-46 The text in Section 4.1.7.1 of the Draft EIR has been modified to clarify that SDG&E accounted for the impacts from three new access spur roads as follows:

SDG&E's revised work space data, however, did not account for access road impacts identified in the PEA to accommodate construction equipment and materials access to individual pole sites (per page 3-41 of the PEA: "smoothing or refreshing of the existing access roads and/or vegetation clearing would be necessary to improve some existing access roads and to re-establish unmaintained access roads"), nor did it account for temporary passing locations that SDG&E determined would be needed for Proposed Project construction (refer to SDG&E Partial Response #3 to Data Request #2, Question #19). ~~Based on location, condition, topography of the existing access roads, and the need to accommodate construction equipment, the CPUC and its environmental~~

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~~consultant have determined it is not reasonable to assume that no new access road impacts would occur as a result of the Proposed Project.~~

D3-47 See responses to comments D2-42 and General Response GR-15 regarding impacts from access road improvements. The impacts of access road improvements have been revised in the Final EIR as shown in General Response GR-15.

D3-48 See responses to comments D2-42 and General Response GR-15 regarding impacts from access road improvements. The impacts of access road improvements have been revised in the Final EIR as shown in General Response GR-15.

D3-49 See response to comment D1-2 regarding the decision not to rely on the NCCP for mitigation of impacts. No changes are required in the Draft EIR.

D3-50 The text in Section 4.1.7.1 has been modified to clarify that SDG&E could use the existing NCCP to satisfy certain biological resource mitigation measure requirements if the NCCP is available during construction of the Proposed Project. The text in Section 4.1.7.1 of the Draft EIR has been revised as follows:

Mitigation measures are specified in this EIR to mitigate for Proposed Project impacts to biological resources in lieu of NCCP-prescribed operational protocols and habitat mitigation or MSCP-prescribed protocols and habitat mitigation requirements, though mitigation measures are consistent with these plans whenever feasible and appropriate. Specific biological resource mitigation measure requirements may be satisfied through compliance with the existing SDG&E NCCP, an amended NCCP, individual ESA permit conditions, or other authorizations obtained by SDG&E, if these requirements are equally or more effective than the mitigation identified in this EIR.

D3-51 Table 4.1-7 has been modified to include APM BIO-2 in Impact Bio-2. This modification to Table 4.1-7 does not change the impact analysis or conclusions in the Draft EIR. Table 4.1-7 of the Draft EIR has been revised as follows:

Significance Criteria	Project Phase	Significance Prior to APMs	Significance after APMs and before Mitigation	Significance After Mitigation
Impact Bio-2: Potential for substantial adverse effect from project construction, either directly or through habitat modifications, on any <u>invertebrate species</u> identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS	Construction	Significant	Significant APM AIR-1 <u>APM BIO-2</u> APM BIO-3 APM BIO-4 APM HYDRO-2 APM HAZ-1 APM HAZ-2	Less than significant MM Biology-3 MM Biology-4 MM Biology-5

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D3-52 The language used in Impact Bio-1 in Table 4.1-7 is from Appendix G of the CEQA Guidelines, which does not specify, for example, CRPR 1 and 2 species. Therefore, no change has been made to Impact Bio-1. The following language has been added to the Draft EIR at the end of Section 4.1.6: CEQA Significance Criteria to more clearly define the criteria for significant impacts for plant and animal species:

More specifically, for Significance Criterion a:

- Any impact on one or more individuals of a federal- or State-listed threatened or endangered species or its habitat would typically be significant because these species are highly sensitive and any impact would significantly affect the population of these species.
- Any impact on CRPR 1B and 2B species that would cause a reduction in numbers of individuals that could have significant impacts on the populations of these species in the vicinity of the proposed Project would be significant.
- Impacts on State Species of Special Concern and State Fully Protected species would be potentially significant.
- Temporary or permanent disturbance of designated critical habitat for federal listed species would be significant.
- Activities that result in the killing of migratory birds or destruction or abandonment of migratory bird nests and/or eggs (Migratory Bird Treaty Act and California Fish and Game Code) would be significant.

The significance of impacts to State Species of Special Concern and State Fully Protected species are not more specifically defined above because the impacts cannot be quantified, as focused surveys for these species were not conducted. Therefore, the Draft EIR takes a conservative approach and assumes that impacts could be potentially significant for these species.

The Draft EIR does not require mitigation measures to address CNPS rank 3 and 4 species, consistent with the comment. The impacts to plant species with a CRPR of 3 or 4 are less than significant due to the higher population density of these species compared to CRPR 1 and 2 species.

Bird species that are on the Watch List are protected under the MBTA and CFGC. Impacts to Watch List species would be significant to ensure consistency with the MBTA and CFGC.

D3-53 SDG&E's comment that the impact from transmission line inspection and maintenance would have a less than significant impact on special-status species is accurate given that inspections would only occur annually within areas that are already subject to inspections and maintenance activities. Inspections would occur infrequently in areas that that are permanently disturbed as a result of the Proposed

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Project construction. The analysis in Impact Bio-7 of the Draft EIR has been revised as follows:

Inspection activities along transmission line Segments A, C, and D would involve continued annual inspections by helicopter and by ground patrols. Maintenance of transmission line Segments A, C, and D would involve repairs of transmission facilities within areas that would be permanently disturbed by construction including pole work areas; however, there is the potential that special-status wildlife species could enter a maintenance work area and be injured or killed during maintenance of the transmission line. The greatest risk of impact would be from vehicular travel on access roads, ~~which would be a significant impact. SDG&E would implement APM BIO-2, which requires implementation of NCCP protocols to reduce impacts to covered species. While APM BIO-2 would reduce impacts to special-status species, the current NCCP may not be available during operation of the Proposed Project, and APM BIO-2 may therefore not be implemented. Therefore, impacts would still be significant even with APM BIO-2. Mitigation Measure Biology 1a requires SDG&E to implement operational protocols, including speed limits for machinery and vehicles, within the Proposed Project area. Impacts would be less than significant with mitigation. However, the Proposed Project would be constructed within existing SDG&E ROW in Segments A, C, and D. The frequency of maintenance activities and associated vehicle travel on access roads would not measurably increase as a result of the Proposed Project. The impact to special-status species from maintenance activities would be less than significant.~~

No changes to Impact Bio-8 are required because impacts on sensitive natural communities from herbicide drift would still occur during maintenance activities for the Proposed Project.

D3-54 Table 4.1-7 of the Draft EIR has been modified to include APM BIO-2 in Impact Bio-8 as follows:

Significance Criteria	Project Phase	Significance Prior to APMs	Significance after APMs and before Mitigation	Significance After Mitigation
Impact Bio-8: Potential to cause a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS	Construction	Significant	Significant APM AIR-1 <del>APM BIO-2</del> APM-BIO-4 APM HYDRO-2	Less than significant MM Biology-3 MM Biology-4 MM Biology-6 MM Biology-11
	Operation and Maintenance	Significant	Significant	Less than significant MM Biology-3

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The text in Impact Bio-8 has been modified to clarify that APM BIO-2 (SDG&E NCCP) has compensation measures for habitat, vernal pools, and road pools. The CPUC cannot rely on SDG&E's NCCP to cover impacts to suitable habitat, vernal pools, and road pools. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is still required to implement Mitigation Measure Biology-4 and Mitigation Measure Biology-6. The text in Impact Bio-8 of the Draft EIR has been revised as follows:

#### *Direct Impacts*

Table 4.1-14 summarizes the impacts to sensitive vegetation communities in the Proposed Project. Temporary and permanent impacts to riparian habitat and sensitive vegetation communities would be significant.

Some of the temporary and permanent impacts to sensitive vegetation communities would be located within the City of San Diego MHPA. Table 4.1-15 provides a summary of the impacts to sensitive vegetation communities within the MHPA. A total of ~~1.55~~ 1.54 acres of MHPA would be permanently impacted, a total of ~~22.03~~ 21.77 acres of sensitive vegetation communities within the MHPA would be temporarily impacted, ~~and 3.34~~ 1.90 acres of sensitive vegetation communities within the MHPA would be permanently impacted from improvements to existing access roads maintenance, and 0.26 acres of sensitive vegetation communities within the MHPA would be temporarily impacted from temporary access roads and passing during construction of the Proposed Project. Impacts to riparian habitat and sensitive vegetation communities in the MHPA would be significant. APM BIO-2 requires the implementation of the current SDG&E NCCP. NCCP protocols include requirements for compensatory mitigation for habitat. NCCP protocols and measures may not apply at the time of Proposed Project construction. Therefore, even after implementation of APMs, impacts would remain significant because compensatory mitigation for habitat would not be implemented if the NCCP were not applied.

Mitigation Measure Biology-6 would reduce the impacts to sensitive vegetation communities, including those in the MHPA, by requiring restoration of temporarily disturbed areas and specifying habitat preservation and mitigation ratios for each type of habitat impact. Impacts to riparian and sensitive vegetation communities would be less than significant with mitigation.

In addition, the Proposed Project would involve the use of vehicles and equipment along access roads that would damage vernal pools. Damage to vernal pools would be a significant impact. SDG&E would implement APM BIO-4 as part of the Proposed Project to avoid or minimize impacts; however, APM BIO-4 does not take into account mitigation in the scenario where a vernal pool is impacted by the Proposed Project. Impacts would therefore remain significant even after implementation of APM BIO-4. APM BIO-2 requires the

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implementation of the current SDG&E NCCP. NCCP protocols include measures to minimize impacts to vernal pools and road pools and requirements for compensatory mitigation in the event that a vernal pool or road pools is permanently impacted. NCCP protocols and measures may not apply at the time of Proposed Project construction. Therefore, even after implementation of APMs, impacts would remain significant because compensatory mitigation for vernal pools and road pools would not be implemented if the NCCP were not applied.

Mitigation Measure Biology-4 would provide additional protection for vernal pools, including compensatory mitigation for impacts to vernal pools and avoidance areas. Impacts would be less than significant with mitigation.

D3-55 Table 4.1-7 of the Draft EIR has been modified to include APM BIO-2 in Impact Bio-9 as follows:

Significance Criteria	Project Phase	Significance Prior to APMs	Significance after APMs and before Mitigation	Significance After Mitigation
Impact Bio-9: Potential to cause a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.), or on state-protected jurisdictional areas not subject to regulation under Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means	Construction	Significant	Significant APM AIR-1 <u>APM BIO-2</u> APM HYDRO-2	Less than significant MM Biology-3 MM Biology-4 MM Biology-6 MM Biology-11
	Operation and Maintenance	Less than significant	---	---

The text in Impact Bio-9 has been modified to clarify that APM BIO-2 (SDG&E NCCP) has compensation measures for vernal pools and road pools. The CPUC cannot rely on SDG&E's NCCP to cover impacts to vernal pools and road pools. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is still required to implement Mitigation Measure Biology-4. The text in Impact Bio-9 has been revised as follows:

Furthermore, there are additional vernal pools and road rut pools that were mapped on access roads within Segments C and D of the Proposed Project. The areas for these vernal pools and road rut pools were not recorded (Appendix G, Figure G-2). There is potential for permanent impacts to additional vernal pool

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areas if SDG&E repairs access roads and fills vernal pools in Segments C and D. Vehicle and equipment access on roads containing vernal pools or road rut pools could also degrade the quality of the pool. The NCCP (APM BIO-2) includes procedures to avoid and mitigate for impacts to vernal pools; however, the NCCP may not be available at the time of project construction. The impact to vernal pools would be significant. Mitigation Measure Biology-4 requires avoidance of vernal pool areas or compensatory mitigation for impacts to vernal pool habitats.

D3-56 Table 4.1-8 of the Draft EIR summarizes the direct impacts to individual special-status plants that were observed during surveys. Table 4.1-8 was prepared by identifying where mapped observations of individual special-status plants overlapped with permanent work areas, temporary work areas, and areas where access roads would be refreshed. All the individuals identified in Table 4.1-8 have a reasonable potential to be impacted directly and permanently by construction activities due to the following three reasons:

- Individual special-status plants are located in areas where permanent pads would be placed (permanent work areas)
- Individual special-status plants are located where the staging of machinery/equipment or the driving of vehicles could trample special-status plants (temporary work areas)
- Individual special-status plants are located in habitat adjacent to access roads (within a 2-foot buffer area) where access roads could be refreshed using heavy equipment

Individual special-status plants would be permanently impacted by permanent work areas and access road refreshing because ground-disturbing activities would uproot the plants or cover the plants and compact them with fill. It is assumed in the Draft EIR that all the special-status plants located in temporary work areas would be crushed or trampled and the weight of the equipment would permanently impact the plants.

The title of Table 4.1-8 has been modified to clarify the content of Table 4.1-8:

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

In addition, the following revisions have been made within the text to clarify the methodology for determining potential impacts to special-status plant individuals.

**Overview of Impacts to Special-Status Plants and Wildlife**

***Special-Status Plants***

Special-status plants that would be directly and permanently affected by the Proposed Project are shown in Table 4.1-8. Table 4.1-8 summarizes the direct impacts to individual special-status plants that were observed during surveys.

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Table 4.1-8 defines impacts to individual special-status plants located within permanent work areas, temporary work areas, and access road refreshing areas.

Figure G-1, maps 1 through 45, of Appendix G: Biological Resources Supporting Information has been revised to include mapped occurrences of special status plants using the GIS data provided by SDG&E.

D3-57 Impact Bio-1 has been revised to address SDG&E's comment that the analysis of impacts to special-status plants focused on impacts to individuals, rather than impacts to the species. The analysis of impacts in Impact Bio-1 has been modified to clarify how the Proposed Project would affect the species. Additional clarifying language has been added to Section 4.1.6: CEQA Significance Criteria of the Draft EIR as shown in response to comment D3-52. Impact Bio-1 of the Draft EIR has been modified as follows:

*Thread-leaved Brodiaea and San Diego Button-celery*

Thread-leaved brodiaea is listed as federally threatened and State endangered and is ranked as CRPR 1B.1, which means it is rare, threatened, or endangered in California and elsewhere. It is also an NCCP-covered species. A total of 0.07 acre of potentially suitable habitat for thread-leaved brodiaea is located in a temporary work area in Segment A. It is assumed that thread-leaved brodiaea is present throughout this potentially suitable habitat, and impacts to thread-leaved brodiaea from the use of the temporary work area would be significant due to the species' federal and State listing status. Any impact to an individual of this species would be significant because the impact would significantly affect the population of this species due to the low numbers and limited occurrence of the species.

San Diego button-celery is listed as federally endangered and State endangered and is ranked as CRPR 1B.1, which means it is rare, threatened, or endangered in California and elsewhere. It is also an NCCP and MSCP-covered species. There is one individual that can be potentially impacted by maintenance of an access road located along Segment C. An impact to this species would be significant due to the species' federal and State listing status. Any impact to an individual of this species would be significant because the impact would significantly affect the population of this species due to the low numbers and limited occurrence of the species.

*Del Mar Mesa Sand Aster, Long-spined spineflower, Nuttall's Scrub Oak, Decumbent Goldenbush, and Summer Holly*

Del Mar Mesa sand aster and Nuttall's scrub oak are ranked as CRPR 1B.1. Decumbent goldenbush, long-spined spineflower, and summer holly are ranked as CRPR 1B.2. Each species is considered rare throughout its range. Construction of the Proposed Project would impact:

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- 1 Del Mar Mesa sand aster
- 18 long-spined spineflower
- ~~95~~ 447 Nuttall's scrub oak
- ~~357~~341 decumbent goldenbush
- ~~15~~ 29 summer holly

~~Impacts to Del Mar Mesa sand aster, Nuttall's scrub oak, decumbent goldenbush, and summer holly would be significant because these species are considered rare throughout their range. An impact to any of these species would significantly impact the species population, since species numbers are already low. Impacts on Del Mar Mesa sand aster would be less than significant because the loss of one out of 34 individuals would not have a significant effect on the population of Del Mar Mesa sand aster in the vicinity of the Proposed Project. Impacts to Nuttall's scrub oak (447 individuals), decumbent goldenbush (341 individuals), summer holly (29 individuals), and long-spined spineflower (18 individuals) would be significant as the loss of these individuals would cause potentially significant impacts to the populations of these CRPR Rank 1B species in the vicinity of the Proposed Project.~~ 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. Impacts to these species would still be significant after implementation of APM BIO-1 because APM BIO-1 does not provide details on appropriate habitat compensation. Mitigation Measure Biology-2 (compensatory mitigation) is required to address these significant impacts. The impacts to Del Mar Mesa sand aster, Nuttall's scrub oak, decumbent goldenbush, and summer holly would be less than significant with mitigation.

#### *Spineshrub, Coast Barrel Cactus, San Diego Marsh-elder, and Wart Stemmed Ceanothus*

Spineshrub and coast barrel cactus are ranked as CRPR 2B.1 and are highly threatened in California but common outside of California. There would be ~~751~~ 591 individuals of Spineshrub and 62 coast barrel cacti directly impacted by construction of the Proposed Project. ~~Impacts on these four species spineshrub and coast barrel cactus~~ would be significant, as the loss of these individuals would cause potentially significant impacts to the populations of these CRPR Rank 2B species in the vicinity of the Proposed Project. San Diego marsh-elder and wart stemmed ceanothus are ranked as CRPR 2B.2 and are moderately threatened in California but common outside of California. There would be ~~ten~~ four (4) individuals of San Diego marsh-elder and one (1) individual of wart stemmed ceanothus impacted during construction of the Proposed Project. Impacts to these ~~two four~~ species would be less than significant as the loss of

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these individuals would not cause potentially significant impacts to the populations of these CRPR Rank 2B species in the vicinity of the Proposed Project because these species are moderately to highly threatened in California.

*Ashy Spike Moss, Graceful Tarplant, Robinson's pepper-grass, Spiny Rush, San Diego sagewort, San Diego Sunflower, and Palmer's Grapplinghook*

The number of ashy spike moss, graceful tarplant, Robinson's pepper-grass, spiny rush, San Diego sagewort, San Diego sunflower, and Palmer's grapplinghook that would be impacted by the Proposed Project are summarized in Table 4.1-8. Graceful tarplant, spiny rush, San Diego sagewort, and San Diego sunflower, and Palmer's grapplinghook are ranked as CRPR 4.2, which means they are of limited distribution or are infrequent throughout a broad area of California. Ashy spike moss is ranked CRPR 4.1, which means that this species is moderately threatened and is of limited distribution in California. Robinson's pepper-grass is ranked CRPR 4.3, which means that this species is not very threatened in California. Because of the lower sensitivity of these species, and low number of individuals impacted by the Proposed Project, impacts would be less than significant. Impacts from the Proposed Project would not significantly impact the populations of these species. No mitigation is required.

*Direct Impacts to Special-status Plants Not Observed in the BSA*

There is some potential for special-status plant species that were not observed during Proposed Project surveys to occur within the Proposed Project work areas because of drought conditions during survey years (refer to Table 4.1-3); however, the multiple surveys for the Proposed Project conducted in 2014 and 2015 were comprehensive, so the potential for missed species is low.

There is some potential for special-status plant species ranked CRPR 3 or 4 to occur at the Proposed Project site. Information about plants with a CRPR 3 is lacking to designate it as a rare species and plants with a CRPR 4 have limited distribution and their vulnerability or susceptibility to threat appears low at the time of CRPR evaluation. Because these species are not considered rare or particularly sensitive, impacts to these species would be considered less than significant because the impacts would not significantly affect the population of these species. No mitigation would be required.

If unanticipated occurrences of special-status plant species that are federal or State listed ~~and/or ranked CRPR 1 or 2~~ were to occur in a work area and were to be impacted by the Proposed Project, impacts would be significant because plants that are federal or State listed ~~and/or ranked CRPR 1 or 2~~ are considered very ~~sensitive rare and the impact would significantly affect the population of the species.~~ If unanticipated occurrences of special-status plant species that are ranked CRPR 1 or 2 were to occur in a work area and were to be impacted by the Proposed Project, impacts would be potentially significant because plants that

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are ranked CRPR 1 or 2 are rare. Impacts to a substantial number of individuals that are ranked CRPR 1 or 2 would be significant because the impact would significantly affect the population of this species.

Mitigation Measure Biology-2 of the Draft EIR has also been revised, as follows:

**Mitigation Measure Biology-2: Compensatory Mitigation for Special-Status Plants.** All special-status federal and/or State listed and/or CRPR Rare Plant Rank 1B or 2B species plant populations (i.e., thread-leaved brodiaea, San Diego button-celery, Nuttall's scrub oak, decumbent goldenbush, summer holly, long-spined spineflower, spineshrub, and coast barrel cactus) shall be staked or flagged by a qualified biologist approved by the CPUC, USFWS, and CDFW if they fall within the limits of work. All stakes, flagging, or fencing shall be removed no later than 30 days after construction is complete. Impacts to special-status plant species shall be avoided to the extent feasible. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation per the direction of the USFWS and/or CDFW. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the CPUC. Off-site mitigation land shall be identified prior to the start of construction. The establishment of long-term land management and legal protection assurances must be completed within 12 months of construction start. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the wildlife agencies, it shall be conducted pursuant to a CPUC-, USFWS-, and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. The salvage and relocation plan shall also define the monitoring strategy with a minimum of annual monitoring for 5 years ~~and-or~~ until success criteria are met. If the salvage and relocation fails to meet the established success criteria after 5 years, maintenance and monitoring shall extend beyond the 5-year period until the criteria are met, or unless otherwise approved by the CPUC. Success criteria shall include a minimum of:

- A surveyed population size count roughly equal to or greater than the number of individuals transplanted (This total may include both transplanted individuals that have survived as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons at the receiver site.),
- Less than 5 percent cover of invasive weeds within the restoration area, and
- Eradication of any noxious invasive weeds.

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Any salvage and relocation plans must be approved by CDFW, USFWS, and CPUC at least 30 days prior to project construction.

- D3-58 Impacts to special-status plants can be minimized or avoided through the implementation of APMs and mitigation measures as discussed in the Draft EIR. As described in Section 4.1.5 of the Draft EIR, impacts are first considered prior to the implementation of APMs and mitigation measures. It was assumed that all of the individuals identified in Table 4.1-8 would be permanently and directly impacted by construction activities as described in response to comment D3-56. The word “would” is used to describe the impacts to individuals located in the work areas as defined by SDG&E. The impact to individual special-status plants defined in the Draft EIR reflects the information that was provided to the CPUC at the time of the Draft EIR. No changes are required in the Draft EIR.
- D3-59 The CPUC cannot rely on SDG&E’s NCCP to cover impacts to special-status plant species covered by the NCCP. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is required to implement Mitigation Measures Biology-1a, -1b, -1c, -1d, -1e, -1f, -1g, -2, -3 and Fire-1, -2, -3, and -4. No changes are required in the Draft EIR.
- D3-60 The CPUC cannot rely on SDG&E’s NCCP to cover impacts to thread-leaved brodiaea and San Diego button celery. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is required to implement mitigation measures to reduce impacts to a less than significant level. No changes are required in the Draft EIR.
- D3-61 See response to comment D3-58, regarding the usage of the term “would.”
- Plants species with a CRPR of 3 or 4 would remain classified as special-status species (see response to comment D3-21). The impact to CRPR List 3 or 4 species is less than significant as defined in the Draft EIR due to the higher abundance of individuals (see response to comment D3-52).
- D3-62 The CPUC cannot rely on SDG&E’s NCCP to cover impacts to Del Mar Mesa sand aster, long-spined spineflower, Nuttall’s scrub oak, decumbent goldenbush, and summer holly. See response to comment D1-2 regarding the decision not to rely on the NCCP for analysis in the Draft EIR for the Proposed Project. SDG&E is required to implement mitigation measures to reduce impacts to a less than significant level. No changes are required in the Draft EIR.
- D3-63 The CPUC cannot rely on SDG&E’s NCCP to cover impacts to spineshrub, coast barrel cactus, San Diego marsh-elder, and wart stemmed ceanothus. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is required to implement mitigation measures to reduce impacts to a less than significant level. No changes are required in the Draft EIR.

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- D3-64 The impacts to Ashy spike moss, graceful tarplant, Robinson's pepper-grass, spiny rush, San Diego sagewort, San Diego sunflower, and palmer's grapplehook would be less than significant without any APMs or mitigation measures as stated in the Draft EIR. The comment that further mitigation measures are not required is irrelevant because no mitigation measures are necessary to reduce impacts on these species. No changes are required in the Draft EIR.
- D3-65 The CPUC cannot rely on SDG&E's NCCP to cover impacts to special-status species that were not observed in the BSA, but which have potential to occur in the Proposed Project site. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is required to implement mitigation measures to reduce impacts to a less than significant level. No changes are required in the Draft EIR.
- D3-66 APM BIO-1 and APM BIO-2 do not reduce the potential impact to special-status plant species covered by the NCCP to a less than significant level. As explained in the Draft EIR and discussed in response to comment D1-2, mitigation measures are necessary to mitigate impacts due to the uncertainty of the NCCP. The mitigation measures in the Draft EIR do not conflict with the NCCP operation protocols or other terms of the NCCP. The CPUC notes SDG&E's request to keep Mitigation Measure Biology-1b. No changes are required in the Draft EIR.
- D3-67 Mitigation Measure Biology-2 mitigates impacts to both special-status plant species that are covered and those that are not covered by the NCCP. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E may use the NCCP mitigation lands for compliance with Mitigation Measure Biology-2 if the mitigation land meets the requirements specified in the mitigation measure. No changes are required in the Draft EIR.
- D3-68 Impact Bio-2 has been revised to address SDG&E's comment that the analysis of impacts to San Diego fairy shrimp focused on impacts to individuals rather than impacts to the species. The language in Impact Bio-2 has been modified to clarify how the Proposed Project would affect the species. Additional clarifying language has been added to Section 4.1.6 of the Draft EIR as shown in response to comment D3-52. Impact Bio-2 of the Draft EIR has been modified as follows:
- San Diego Fairy Shrimp and Vernal Pool Fairy Shrimp*  
San Diego fairy shrimp ~~and vernal pool fairy shrimp are is a~~ federally listed species and ~~has~~ have a high potential to occur in vernal pool and road rut pool habitats within Segments C and D of the Proposed Project (Appendix G, Figure G-2). San Diego fairy shrimp is also known to occur within its USFWS-designated critical habitat, some of which is located in Segment C. There are no permanent structures that would be built on potentially suitable habitat for San Diego fairy shrimp ~~and vernal pool fairy shrimp~~. However, there is potential for permanent impacts to pools and San Diego fairy shrimp if SDG&E repairs access

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roads and fills in road rut pools containing suitable habitat in Segments C and D. Vehicle and equipment access on roads containing vernal pools or road rut pools could also degrade the quality of the pool or crush San Diego fairy shrimp cysts. These impacts would be significant— because any impact to one or more individuals of a federal listed species would significantly affect the population of this species.

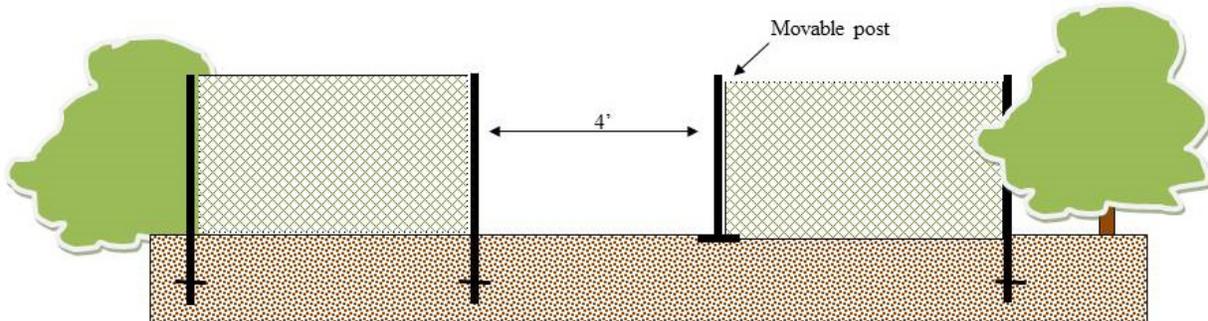
- D3-69 Impacts to road pools and vernal pools are analyzed in Section 4.1.8, Impact Bio-2 of the Draft EIR. There are road pools and vernal pools located along the access roads that SDG&E proposes to use (see Segments C and D of Figure G-2 in Appendix G: Biological Resources Supporting Information of the Draft EIR) and access road repairs and grading along access roads would permanently impact suitable habitat for San Diego fairy shrimp (vernal pools and road pools). Prior to the implementation of any APMs or mitigation measures, vehicles and grading activities could affect vernal pools and road pools. Impacts on vernal pools and road pools would be reduced by APM BIO-3, and SDG&E would compensate for any permanent impacts to vernal pools or road pools per requirements in Mitigation Measure Biology-4. The analysis in the Draft EIR correctly considers the potential for impacts on vernal pools and road pools and ability for the APMs to reduce that impact. No changes are required in the Draft EIR.
- D3-70 See response to comment D2-53 regarding QCB impacts.
- D3-71 See response to comment D2-53 regarding QCB impacts.
- D3-72 See response to comment D2-53 regarding QCB impacts. The mitigation measure is required to reduce significant impacts to QCB for the reasons stated in the Draft EIR in Section 4.1.8, Impact Bio-2 and response to D2-53. No changes are required in the Draft EIR.
- D3-73 See response to comment D3-69 regarding permanent impacts to vernal pools. The limited access between structures E9 and E12 was not proposed by SDG&E as an APM prior to the Draft EIR; however, it is applied through Mitigation Measure Biology-5. Impacts to vernal pools would be significant prior to mitigation. No change is required in the Draft EIR.
- D3-74 See response to comment D3-69 regarding permanent impacts to vernal pools. The CPUC cannot rely on SDG&E's NCCP to cover impacts to vernal pool and road pools. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. Mitigation Measure Biology-4 follows the procedures for mitigation of impacts to vernal pools defined in the NCCP and is consistent with the approach in the NCCP.
- D3-75 The text in Impact Bio-2 of the Draft EIR has been modified to clarify that APM BIO-2 (SDG&E NCCP) has compensation measures for vernal pools and road

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pools. Mitigation Measure Biology-4 includes mitigation for vernal pools that is consistent with the mitigation included in the NCCP. The CPUC cannot rely on SDG&E's NCCP to cover impacts to vernal pools and road pools. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is still required to implement Mitigation Measure Biology-4. The text in Impact Bio-2 of the Draft EIR has been revised as follows:

SDG&E would implement APM BIO-4 as part of the Proposed Project, which requires measures to avoid and minimize impacts to vernal and road rut pools that provide suitable habitat for [San Diego](#) fairy shrimp. However, the measures in APM BIO-4 are not considered adequate to reduce the potential impacts to listed [San Diego](#) fairy shrimp [species](#) to less than significant levels because APM BIO-4 does not require full avoidance of vernal pools or road rut pools; as a result, the quality of the pools could be degraded and cysts could be crushed, resulting in a significant impact. [APM BIO-2 requires the implementation of the current SDG&E NCCP. NCCP protocols include measures to minimize impacts to vernal pools and road pools and requirements for compensatory mitigation in the event that a vernal pool or road pools is permanently impacted. NCCP protocols and measures may not apply at the time of Proposed Project construction. Therefore, even after implementation of APMs, impacts would remain significant because compensatory mitigation for vernal pools and road pools would not be implemented if the NCCP is not applied.](#) Mitigation Measure Biology-4 specifies further requirements for avoidance or compensation of impacts to vernal and road rut pools to reduce impacts to special-status [San Diego](#) fairy shrimp. Implementation of Mitigation Measure Biology-4 would reduce potential impacts to San Diego [fairy shrimp](#) and [vernal pool fairy shrimp](#) to a less-than-significant level.

D3-76 The CPUC acknowledges that SDG&E cannot completely block off access roads between Poles E19 and E12 because the City of San Diego utilizes these roads. Gina Washington at the City of San Diego Parks and Recreation Department was informed of the mitigation measure and suggested that a 4-foot wide opening would suffice for trail access. The figure below was provided by Gina Washington and shows that a moveable post should be installed to maintain a 4-foot wide opening. She also suggested the use of green fence.



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Mitigation Measure Biology-4 of the Draft EIR has been modified to allow access for non-construction vehicles as follows:

No construction access shall be allowed at any time on the access road in transmission line Segment C between poles E9 and E12 as shown in Figure 4.1-4 due to the substantial number of existing vernal pools and road rut pools present within and immediately adjacent to the access road. ~~Orange construction~~ Green snow fencing shall be installed at the end points of the restricted access with a moveable post that allows for a 4-foot wide opening. Temporary signage shall be posted on the fencing stating, "No construction access permitted." The no construction access area shall be monitored by a CPUC-, USFWS-, and CDFW-approved biologist to ensure no vehicle access or entry occurs throughout the duration of construction.

D3-77 The CPUC cannot rely on SDG&E's NCCP to cover impacts to vernal pools or road pools from operation and maintenance activities. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. The CPUC is aware of the Vernal Pool Clarification memo included within the NCCP and Mitigation Measure Biology-4 is consistent with that memo. Mitigation Measure Biology-4 mitigates impacts from operation and maintenance activities. No changes are required in the Draft EIR.

D3-78 See response to comment D2-53 regarding QCB impacts. Because significant impacts to QCB would remain, mitigation is required. No changes are required in the Draft EIR.

D3-79 Impact Bio-3 of the Draft EIR has been revised to address SDG&E's comment that the analysis of impacts to western spadefoot focused on impacts to individuals, rather than impacts to the species. There is insufficient information to quantify the number of individuals of western spadefoot that would be impacted by the Proposed Project. It was assumed that the Proposed Project could impact a large number of individuals, which would have a significant impact on the species. The language in Impact Bio-3 has been modified to clarify how the Proposed Project would affect the species. Additional clarifying language has been added to Section 4.1.6: CEQA Significance Criteria of the Draft EIR as provided in response to comment D3-52. Impact Bio-3 of the Draft EIR has been modified as follows:

Western spadefoot would be injured or killed, if present, and suitable habitat would be affected during vegetation removal and vehicle and equipment travel on access roads. Construction would result in temporary impacts to 0.01 acre of freshwater marsh. Construction would also permanently impact potential vernal or road rut pool habitat for access road repair and vehicle and equipment travel. Because no focused surveys were performed for western spadefoot, it is not possible to fully and accurately quantify impacts to western spadefoot; therefore, it is assumed that construction of the Proposed Project could significantly impact

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western spadefoot. SDG&E would implement APMs BIO-2 and BIO-4 as part of the Proposed Project, which would reduce impacts to western spadefoot.

- D3-80 The analysis in the Draft EIR correctly states that vegetation removal and vehicle and equipment travel would injure or kill western spadefoot if present. If western spadefoot are not present within the work area or on access roads during construction, the Proposed Project would not result in injury or mortality. The Draft EIR identifies the significant impacts that would result from the Proposed Project as required by CEQA. CEQA does not require that an EIR identify scenarios where the impacts would not occur.
- D3-81 See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. APM BIO-4 does not include measures to mitigate permanent impacts to vernal pools or road pools. Although APM BIO-2 (NCCP) does include compensatory mitigation for vernal pools and road pools, the NCCP cannot be relied on for mitigation, as discussed in response to comment D1-2. Impacts would be significant prior to mitigation as described in the Draft EIR. No changes are required in the Draft EIR.
- D3-82 The NCCP is considered in the Draft EIR impact analysis; however, as described in the Draft EIR, the NCCP protocols and mitigation measures may not apply to the Proposed Project at the time of construction. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. Mitigation Measure Biology-6 defines requirements for habitat compensation. This measure has been revised as shown in response to comment A2-8 to align with the requirements of the NCCP. Mitigation Measure Biology-6 does not preclude the use of the NCCP mitigation bank to comply with the compensatory mitigation requirements in the measure. SDG&E may use the NCCP mitigation bank to comply with Mitigation Measure Biology-6. No additional revisions to Mitigation Measure Biology-6 are required.
- D3-83 The analysis of impacts in Draft EIR Section 4.1.8, Impact Bio-4 has been revised to address SDG&E's comment that the analysis of impacts to special-status reptiles focused on impacts to individuals, rather than impacts to the species. The impact analysis in Impact Bio-4 has been revised to clarify how the Proposed Project would affect each species. Additional language has been added to Section 4.1.6 of the Draft EIR as shown in response to comment D3-52. Impact Bio-4 of the Draft EIR has been revised as follows:
- Impacts to ~~each of these species~~ red-diamond rattlesnake, Coronado skink, coast horned lizard, coast patch-nosed snake, and two-striped garter snake through potential injury or mortality and loss of suitable habitat would be significant. Because no focused surveys were performed for these species, it is not possible to fully and accurately quantify impacts; therefore, it is assumed that construction of the Proposed Project could significantly impact these species. These special-

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status reptile species are covered under SDG&E's NCCP. APM BIO-2 requires the implementation of the SDG&E NCCP protocols for special-status reptile species covered under the current NCCP. NCCP protocols include avoidance measures and compensatory mitigation. The NCCP protocols and mitigation measures may not apply to the Proposed Project at the time of construction; therefore, impacts to red-diamond rattlesnake, Coronado skink, coast horned lizard, coast patch-nosed snake, and two-striped garter snake special-status reptiles would still be significant after implementation of APM BIO-2. Mitigation Measures Biology-1a, Biology-1b, Biology-1c, and Biology-1d would reduce impacts to red-diamond rattlesnake, Coronado skink, coast horned lizard, coast patch-nosed snake, and two-striped garter snake special-status reptiles by requiring reduced speeds, worker training, pre-construction surveys, delineation of sensitive habitats, and inspection of trenches. Mitigation Measure Biology-4 requires avoidance and compensation for impacts to vernal pool habitats, and Mitigation Measure Biology-6 requires compensation for impacts to other habitat areas. Impacts to these special-status reptile species would be less than significant with mitigation.

Impacts to San Diego ringneck snake, rosy boa, and San Diego banded gecko would be less than significant because these special-status reptile species occur in higher numbers in the region. These species are not federal or State listed as endangered or threatened, State Species of Special Concern, or State Fully Protected. Impacts from the Proposed Project to a small number of individuals would not significantly affect the species.

- D3-84 See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. APM BIO-4 does not include measures to mitigate permanent impacts to vernal pools or road pools. Although APM BIO-2 (NCCP) includes compensatory mitigation for vernal pools and road pools, the NCCP cannot be relied on for mitigation, as discussed in response to comment D1-2. Impacts would be significant due to the uncertainty of the NCCP applicability and due to the lack of compensatory mitigation requirements in APM BIO-4. No changes are required in the Draft EIR.
- D3-85 See response to comment D3-84. No changes are required in the Draft EIR.
- D3-86 See response to comment D3-29 regarding the potential for burrowing owl to occur within the Proposed Project area and response to comment D3-30 regarding the potential for Least Bell's vireo to occur within the Proposed Project area. No changes are required in the Draft EIR for these species.

The potential for yellow-breasted chat to occur within the Proposed Project area is identified correctly in the Draft EIR; no changes are required. Although no yellow-breasted chat individuals were observed during the Least Bell's vireo protocol level

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survey, yellow-breasted chat could occur within the Proposed Project area due to the presence of suitable habitat. The methodology used to determine the potential for a species to occur is described in Section 4.1.3.2 of the Draft EIR and in response to comment D3-27. Suitable habitat and known nearby occurrences of the species are considered in the potential to occur determination for each species. The protocol level survey is not sufficient to determine yellow-breasted chat is absent from the Proposed Project site. Wildlife species move and use different habitat areas at different times. The absence of a species in a location is not proof that the species will not occur there in the future. Table G-3 in Appendix G: Biological Resources Supporting Information of the Draft EIR describes the potential for yellow-breasted chat to occur in the Proposed Project area, including the rationale for the determination. No changes are required in the Draft EIR.

- D3-87 See response to comment D3-52 for clarification on the significance threshold for special-status birds. The impacts described in the Draft EIR are consistent with the thresholds for significance clarified in response to comment D3-52. The Draft EIR has been revised as shown in response to comment D3-52 to provide clarification.
- D3-88 The analysis of noise impacts on nesting birds has been revised to account for high existing noise levels along portions of the Proposed Project alignment and clarify what constitutes a significant impact from noise from construction. Noise impacts from operation and maintenance are addressed under Impact Bio-7. The analysis of noise impacts in Impact Bio-5 of the Draft EIR has been revised as follows:
- Impacts to special-status bird species through potential injury or mortality and nest abandonment or destruction would be significant. Excessive noise would adversely affect the breeding activities of special-status birds. If construction ~~or operation/maintenance~~ noise ~~was were~~ to ~~meet or~~ exceed the existing baseline noise level for a site by more than 3 dB hourly average or an hourly average threshold of 60 decibels, whichever is higher, at the edge of the occupied habitat of these species during their breeding seasons and cause nest abandonment or failure, the impact would be significant. SDG&E would implement AMP BIO-2 as part of the Proposed Project to reduce impacts to NCCP covered species.
- D3-89 The CPUC cannot rely on SDG&E's NCCP to cover impacts to special-status birds. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is therefore still required to implement Mitigation Measure Biology-6 to reduce impacts to special-status birds to a less than significant level. The CPUC notes the comment that an adaptive management mitigation measure has been previously implemented with success; however, an adaptive management measure was not provided as an APM or specified in the comment; therefore, it is not included in the Draft EIR impact analysis. No change is required in the Draft EIR.

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- D3-90 See response to comment D3-29 regarding the potential for burrowing owl to occur within the Proposed Project area.
- D3-91 The timeframe for nest surveys detailed in Mitigation Measure Biology-7 has been modified to better reflect the timeframe for nest establishment while protecting nesting birds. The nest surveys timeframe has been revised from 48 hours to 5 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities to coincide with the timeframe for nest establishment and to provide greater flexibility to time the surveys prior to activity. This revision does not change the effectiveness of the mitigation measure because it takes approximately a week for nests to establish and there would be sign of nest building activities five days prior to construction if a nest were to occur in the area. Revisions to Mitigation Measure Biology-7 of the Draft EIR are shown in response to comment A2-9.
- D3-92 See response to comment D3-38 regarding the draft Fish and Game Code regulations and revisions to the Draft EIR.
- D3-93 The survey buffers used in the Salt Creek Final EIR are irrelevant to the survey buffers for the Sycamore—Peñasquitos Project because they are different projects with different impacts; however, the survey buffers are the same as those applied in the Salt Creek Final EIR (Panorama Environmental, Inc. 2015) (refer to page 4.4-59 of the Salt Creek Final EIR).
- Mitigation Measure Biology-7 has been revised to remove any references to golden eagle and Swainson’s hawk, per SDG&E’s correct observation that the Draft EIR determined that these species are absent from the Proposed Project area and there is no suitable habitat present for these species in the vicinity of the Proposed Project. Revisions to Mitigation Measure Biology-7 are shown in response to comment A2-9.
- D3-94 Mitigation Measure Biology-7 has been revised as shown in response to comment A2-9 to clarify that SDG&E can obtain reductions for nesting bird buffers when the buffer covers a road that is limited to project-specific use.
- D3-95 A nesting bird management plan was not prepared as part of the PEA for CPUC review. Mitigation Measure Biology-7 was designed to include standard components of a nesting bird management plan, including a specific buffer reduction process. This portion of the measure is designed to allow standard buffers to be reduced given that the buffer reduction does not threaten the success of an active nest. The buffer reduction process specified in the measure includes consideration of the same variables specified in the comment. No changes are required in the Draft EIR.
- D3-96 See response to comment D3-30 regarding the potential for Least Bell’s vireo to occur within the Proposed Project. No changes are required in the Draft EIR.

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- D3-97 Mitigation Measure Biology-7 of the Draft EIR has been modified to account for the existing baseline noise conditions consistent with response to comment D3-88. Mitigation Measure Biology-7 revisions are shown in response to comment A2-9.
- D3-98 Mitigation Measure Biology-7 is consistent with the analysis in the Draft EIR. Monitoring is required for nests that establish near active work areas because the activity could still impact the nest success. No change is required in the Draft EIR.
- D3-99 Comment noted. It is noted that SDG&E currently voluntarily complies with Avian Power Line Interaction Committee (APLIC) standards. As stated on page 4.1-85 of the Draft EIR, "With implementation of Mitigation Measure Biology-7, the impacts to special-status bird species, with the exception of the burrowing owl, would be less than significant." No change is required in the Draft EIR.
- D3-100 The monthly written report is intended to summarize the nests that were located and the monitoring of the nesting buffers. The information that is included in the buffer reduction request, the work conducted on the site, the duration of work activities, and related buffer reduction provide necessary background information to provide context for the reviewer. No changes are required in the Draft EIR.
- D3-101 See response to comment D3-29 regarding the potential for burrowing owl to occur within the Proposed Project area. A mitigation monitoring plan is necessary because there is suitable habitat for burrowing owl and burrowing owl could occur within the Proposed Project area during construction. No changes are required in the Draft EIR.
- D3-102 The analysis of impacts to special-status mammals has been revised in Draft EIR Section 4.1.8, Impact Bio-6 to clarify how the Proposed Project would affect special-status species as opposed to individuals of the species. Additional clarifying language has been added to Section 4.1.6 of the Draft EIR as shown in response to comment D3-52. The impact analysis in Impact Bio-6 of the Draft EIR has been revised as follows:
- Proposed Project construction would result in direct impacts to special-status mammal species if the species were injured or killed during construction activities. Injury or mortality would occur primarily during vegetation removal and grading and potentially from use of access roads. Direct injury or mortality to the southern mule deer and mountain lion are not expected. Construction would also result in direct permanent and temporary loss of suitable habitat as shown in Table 4.1-13.
- Injury or mortality of the other these species during construction (i.e., northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, dulzura pocket mouse, and southern grasshopper mouse) would be a significant impact because they are all State Species of Special Concern and rare in the region. Because no focused surveys were performed for

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these species, it is not possible to fully and accurately quantify impacts from construction of the Proposed Project on each species; therefore, it is assumed that construction of the Proposed Project could significantly impact these species.

Construction could also result in the destruction of a San Diego desert woodrat nest, which would be a significant impact. SDG&E would implement APM BIO-2 as part of the Proposed Project, which requires the implementation of the SDG&E NCCP protocols for special-status mammal species covered under the NCCP. NCCP protocols include avoidance measures and compensatory mitigation. The current NCCP protocols and mitigation measures may not apply to the Proposed Project at the time of construction; therefore, impacts would remain significant after implementation of APM BIO-2. Mitigation Measures Biology-1a, Biology-1b, Biology-1c, and Biology-1d would reduce impacts to special-status mammals by requiring reduced speeds, worker training, pre-construction surveys, delineation of sensitive habitats, and inspection of trenches. Mitigation Measure Biology-9 requires pre-construction surveys and impact minimization measures for San Diego desert woodrat. With implementation of these mitigation measures, impacts to special-status mammal species, with the exception of bats, would be less than significant.

Impacts to suitable habitat for special-status mammals would be dispersed over the 16 mile Proposed Project area. Habitat impacts would occur at each pole work area and there would be suitable foraging and breeding habitat surrounding the Proposed Project that would not be impacted during construction. Mammal species have large ranges and would be able to use suitable habitat areas around the Proposed Project. Therefore, the impact to special-status mammals from habitat loss (other than bat roosts or woodrat nest destruction) as a result of the Proposed Project would be less than significant. No mitigation is required.

#### *Bats*

The following special-status bat species were not observed in the BSA but have moderate potential to occur because of presence of potentially suitable habitat:

- Big free-tailed bat
- Pallid bat
- ~~Pocketed free-tailed bat~~
- Western mastiff bat
- Western red bat

Direct impacts to these species would occur through injury or mortality of individuals from collision with equipment, disruption or destruction of a roost during vegetation removal (including tree trimming/removal), earthwork, or work on or near a bridge. Construction would involve work on a bridge, which could support bat roosts. The disturbance of a special-status maternal bat roost during breeding season would be a significant impact. Because no focused surveys were performed for these species, it is not possible to fully and

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accurately quantify impacts to bats; therefore, it is assumed that construction of the Proposed Project could significantly impact these species.

- D3-103 The analysis in Section 4.1.8, Impact Bio-6 of the Draft EIR has been revised as shown in response to comment D3-102 to clarify that impacts on special-status maternal bat roosts are considered significant.
- D3-104 Modifications to mitigation measures for other CPUC projects are not relevant to the impacts and mitigation measures of the Proposed Project because other projects such as the Salt Creek Substation Project occur in a different location with different resources. The proposed modifications to Mitigation Measure Biology-9 in the comment remove specific performance standards necessary to mitigate impacts to desert woodrat. No changes are required in the Draft EIR.
- D3-105 Mitigation Measure Biology-10 of the Draft EIR has been modified to clarify that the measure only applies to special-status bats and not to non-special-status bat species. Mitigation Measure Biology-10 has also been modified to clarify that the no-work exclusion buffers only apply to active special-status bat maternity roosts and not general active roosts, as described in the Draft EIR and clarified in response to comment D3-103. Mitigation Measure Biology-10 of the Draft EIR has been revised as follows:
- Mitigation Measure Biology-10: Mitigation for Special-Status Bat Species.**  
Prior to construction, suitable special-status bat habitat shall be assessed by a CPUC- and CDFW-approved, qualified biologist in trees within a 50-foot buffer of active work areas and in any structures with suitable special-status bat roosting habitat within a 100-foot buffer of active work areas (e.g., bridges). If an active special-status bat maternity roost is found in a tree or structure, the approved biologist shall define an appropriate limited or no-work exclusion buffer surrounding the special-status bat maternity roost ~~based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), the type of work to occur, and the duration of the work related disturbance.~~
- D3-106 SDG&E's comment is consistent with the intent of the measure, which is to limit construction activity and associated noise near maternal roosts of special-status bat species. Due to the limited availability of habitat along the 16-mile long alignment, this measure could not substantially reduce construction access. No changes to the measure are necessary in the Draft EIR.
- D3-107 See response to comment D3-99. No change is required in the Draft EIR.
- D3-108 The CPUC cannot rely on SDG&E's NCCP to mitigate impacts from permanent pad and access road maintenance. See response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. The CPUC agrees that Mitigation Measure Biology-1e would not be required to mitigate for

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access road impacts during operation and maintenance of the Proposed Project. Access road impacts would be negligible because the 14-foot-wide roads would be suitable for maintenance activities and maintenance activities for the Proposed Project would not substantially differ from activities currently carried out by SDG&E to maintain roads. However, Mitigation Measure Biology-3 would still be required to mitigate for impacts from invasive weeds. Impact Bio-7 of the Draft EIR has been revised as follows:

While APM BIO-2 would reduce impacts, the current NCCP may not be available during operation of the Proposed Project, and APM BIO-2 may therefore not be implemented. Therefore, impacts would still be significant even with APM BIO-2. ~~Mitigation Measure Biology-1e defines protocols for access road maintenance, and~~ Mitigation Measure Biology-3 defines weed control requirements.) Implementation of Mitigation Measures ~~Biology-1e and~~ Biology-3 would reduce or avoid these impacts. Impacts would be less than significant with mitigation.

- D3-109 See response to comment D3-53 for revisions to the impact analysis for operation and maintenance under Impact Bio-7.
- D3-110 See response to comment D2-42 regarding impacts from access road improvements. Impacts to access roads have been recalculated in General Response GR-15 to consider the 14-foot wide access road as part of the existing condition and not a project-specific impact consistent with the NCCP and agency comments. The remaining access road impacts (totaling 3.05 acres) account for a buffered area adjacent to the roads that contain habitat and which have not been previously disturbed.
- D3-111 See response to comment D3-54 regarding the use of APM BIO-2 to avoid or minimize impacts on vernal pools. See also responses to comments D3-75 and D3-77.
- D3-112 Comment noted regarding SDG&E's suggestion that jurisdictional impacts could be avoided through redesign. The impacts to jurisdictional resources defined in the Draft EIR reflect the project design and GIS data filed by SDG&E.
- D3-113 See responses to comments D3-69 and D3-74 regarding permanent impacts to vernal pools.
- D3-114 See response to comment D3-69 regarding construction activities that could impact vernal pools. SDG&E is correct that impacts to vernal pools would likely require a permit from the U.S. Army Corps of Engineers and the Regional Water Quality Control Board.
- D3-115 The CPUC, as the CEQA lead agency, has a responsibility to define mitigation measures to reduce impacts of the Proposed Project. Mitigation measures in the

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Draft EIR differ slightly from the operational protocols in the NCCP because the mitigation measures in the Draft EIR were defined by the CPUC to mitigate significant impacts to biological resources that could result from the Proposed Project and to ensure CPUC enforceability of the mitigation measures. The mitigation measures in the Draft EIR do not conflict with the NCCP and generally follow the framework for mitigation including mitigation ratios for permanent impacts as defined in the NCCP. See also response to comment D1-2 regarding the decision not to rely on the NCCP to mitigate impacts of the Proposed Project. SDG&E is required to implement mitigation measures to reduce impacts to a less than significant level. No changes are required in the Draft EIR.

D3-116 The significance criteria identified in Tables 4.1-17 through 4.1-21 of the Draft EIR are consistent with the CEQA significance criteria in CEQA Guidelines Appendix G and the significance criteria applied to the Proposed Project (see response to comment D3-21). No change is required in the Draft EIR.

D3-117 The analysis of impacts to special-status species reflects the project design and GIS data submitted by SDG&E. As discussed in the Draft EIR, impacts to special-status species can be reduced or avoided through the implementation of APMs and mitigation measures; however, the impact analysis first defines the impact that would occur prior to the implementation of these measures. See also response to comment D3-58. No change is required in the Draft EIR.

D3-118 See General Response GR-3 regarding the intended use of visual simulations.

The Figure 4.2-6 (KOP #1) visual simulation has been remodeled in response to this comment. The KOP #1 visual simulation in the Draft EIR and remodeled KOP #1 simulation are provided below to document changes to the visual simulation.

KOP #1 is 0.25 miles (1,335 feet) from the Proposed Project structures. This is a middleground view. When project features are beyond the foreground (in the middleground or background), structural details are less conspicuous. The new vertical TSP, the additional conductor spans and the introduction of a retaining wall and marker balls are the co-dominant Proposed Project features influencing contrast and visual change.

#### **Tubular Steel Pole Arms**

SDG&E commented that the simulation of the proposed TSP arms appear to be curved (gull wing) instead of straight arms. SDG&E has a history of using gull arms elsewhere in the existing ROW as shown in Draft EIR Figures 4.2-7, 4.2-9, 4.2-11, and 4.2-13; however, the proposed TSP arms would be straight and similar to the TSP arms shown in Draft EIR Figures 2.2-8 and 2.2-17.

Although the TSP arms were simulated incorrectly, the visual difference between curved instead of straight arms is not substantial and would be hardly perceptible

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Draft EIR Figure 4.2-6 KOP 1 – Photosimulation (After Proposed Project) – View from Stonebridge Athletic Field Looking Northwest



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Figure 4.2-6 KOP 1 – Photosimulation (After Proposed Project) – View from Stonebridge Athletic Field Looking Northwest (Revised)



Note: This photosimulation is an artistic representation of the Proposed Project's appearance from a particular KOP to graphically represent project features and support an assessment of visual change. The final design of Proposed Project features and elements may differ slightly from those depicted in the simulation.

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to the visual observer at a distance from the poles. This low level of visual change is evident in the revised simulation (Figure 4.2-6) where TSP arms have been corrected to be straight.

#### **Marker Balls**

SDG&E noted that the marker balls appeared incorrectly sized and colored. The FAA recommends using orange, white, and yellow marker balls normally with an orange marker ball at each end of the line. Additionally, the FAA recommends that marker balls<sup>1</sup> not be less than 36 inches in diameter and marker balls should be spaced equally along wires at intervals no greater than 200 feet. The Proposed Project marker balls would be installed in accordance with the final FAA determination. Details regarding the FAA recommended locations and spacing of marker balls are provided under General Response GR-2.

The KOP #1 simulation depicts yellow, white, orange, and red marker balls. The marker balls are accurately sized and spaced, but include an additional red color in addition to the FAA recommended colors (i.e., orange, white, and yellow) based on field observations made in the Proposed Project vicinity. The marker balls have been revised in Figure 4.2-6 to show only the FAA-recommended three colors. The revisions to Figure 4.2-6 demonstrate that the removal of a red marker ball color would not affect the overall visual impact.

#### **Conductors**

SDG&E commented that the conductors on the west side of the proposed TSP should be bundled. From the perspective and distance shown within the simulation, it is not easily discernable whether the conductors are bundled. The route of the conductors have been revised in the Figure 4.2-6 simulation to increase the visibility of the bundling and document that this visual impact is hardly discernable from the conductors shown in the Draft EIR visual simulations.

#### **Yellow Bands and High Voltage Bands**

SDG&E commented that yellow bands are shown inaccurately at the top of the proposed TSPs and that high voltage bands should be removed. No yellow bands are visible within the simulation due to the significant distance to the nearest TSP at KOP #1. The simulation is revised to show yellow bands on the TSPs below the lowest line conductor as requested in the comment. The impact of the yellow bands on visual quality is nearly imperceptible because the yellow bands are not dominant features, as reflected in the simulation.

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<sup>1</sup> For extensive catenary wires that cross canyons, lakes, rivers, etc.

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#### **Retaining Wall**

SDG&E commented that the retaining wall appears to be substantially larger than proposed by SDG&E, and did not accurately portray the wall transition with the existing landscape or the size of the wall blocks. The retaining wall at this location would be approximately 10 feet high by 141 feet long, as indicated in Table 2.3-4 in the Draft EIR. The simulated retaining wall appears more than 10 feet tall in comparison to the surroundings shown in the simulation; therefore, the retaining wall has been revised in Figure 4.2-6 to better represent the proposed height as compared to the surroundings. The revision more accurately represents the height of the retaining wall at KOP #1. The wall transition on the south side of the retaining wall is not easily viewed from the distance and angle of KOP #1; therefore, this transition is only partially shown in the simulation. The wall transition is an estimation as grading contours and transition details were not previously provided by SDG&E in the PEA or data request responses. The retaining wall block type is an artistic depiction of the color and texture of retaining wall blocks and the retaining wall blocks are representative of the viewer perspective.

#### **Conclusion**

The KOP #1 simulation has been revised in response to comment D3-118. The retaining wall has been shortened, the conductors were rerouted and the red marker ball has been replaced with an aviation orange marker ball. The retaining wall presence and the introduction of a new architectural form into the landscape remain obvious. The rerouting of the conductor spans is inconsequential to the analysis. The removal of the red marker ball would only be apparent to the most perceptive observers in a side-by-side comparison of the revised Figure 4.2-6 simulation and the simulation in the Draft EIR.

To further substantiate these observations the analysis matrix for KOP #1 has been revised in Appendix F: Aesthetics Resources Support Information of the Draft EIR. The retaining wall and TSP are the dominant project features that influence the viewshed and the visual change introduced by the Proposed Project. The wall's vertical presence is less profound in the revised simulation; however, its presence and incongruity are still obvious and the visual impact score does not change in response to the revisions to the visual simulation. The visual impact at KOP #1 remains moderately high and significant prior to mitigation. See General Response GR-3 regarding the intended use of visual simulations.

D3-120 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #2 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The TSP is over 1,300 feet from the observer's vantage point. The middleground perspective is 1,345 feet (0.25 mile), and project feature details are most discernable in the foreground perspective. Changes to the TSP arms and bundling have been

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depicted in the revised KOP #1 simulation (see response to comment D3-118) and demonstrate the nearly imperceptible level of change that would result from the requested modifications. See the revised KOP #7 simulation in response to comment D3-125 for an example of the change that would result from the modification of the marker ball colors.

For further detail regarding the visual impacts of the requested revisions to the simulated TSP arms, conductors, and marker ball colors see response to comment D3-118 and General Response GR-3.

The KOP #2 simulation in the Draft EIR is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #2 simulation has not been revised because the requested changes would either be unnoticeable or would minimally reduce the visual contrast in the case of the marker ball coloring. The analysis in the Draft EIR concluded the visual impact on KOP #2 would be “moderate”. The potential minor reduction in contrast from the revised coloring of the marker balls may minimally reduce the less than significant visual impact at the KOP; however, the requested modifications would not affect the determination of a less than significant visual impact on KOP #2.

D3-121 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #3 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The Proposed Project structures are over 880 feet from the observer’s vantage point. This is a distant foreground perspective. The revised KOP #1 simulation provided in response to response to comment D3-118 above demonstrates the low and nearly imperceptible level of change that would result from use of straight TSP arms and bundled conductors. The revised KOP #7 simulation in response to comment D3-125 provides an example of the change that would result from the modification of the marker ball colors.

The KOP #3 simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #3 visual simulation (Figure 4.2-10 of the Draft EIR) has not been revised because the minor revisions to the TSP arms, conductor bundling, and jumper loop are inconsequential to the visual impact that would result from the new TSP, retaining wall, conductors and marker balls. The communication wire, marker ball locations, and retaining wall height have been reviewed and appear correct in the Draft EIR simulation. The analysis in the Draft EIR concluded the visual impact on KOP #3 would be “moderate” and less than significant. The modifications requested by SDG&E would not affect the determination of a less than significant visual impact with mitigation on KOP #3.

D3-122 See General Response GR-3 regarding the intended use of visual simulations.

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The requested revisions to the KOP #4 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The Proposed Project structures are over 950 feet from the observer's vantage point, a distant foreground perspective. In the elevated vantage point at KOP #4, the Proposed Project features are back dropped against the landscape, which allows the Proposed Project features to recede more quickly. The middleground perspective is 1,345 feet (0.25 mile) and project feature details are most discernable in the foreground perspective. The KOP #4 simulation (Figure 4.2-12 of the Draft EIR) has not been revised because for the reasons discussed below. See also General Response GR-3 for the low level of visual impact resulting from each of the requested modifications to the visual simulation.

#### **TSP Arms and 230-kV Structure Cross Arms**

SDG&E commented that the proposed TSP arms appear to be gull instead of straight and the 230-kV cross arms appear to be angled instead of parallel to the ground. See response to comment D3-118 and General Response GR-3 for additional information regarding TSP arms. Although the TSP arms and 230-kV cross arms were simulated incorrectly, the visual difference between curved or angled arms instead of straight arms would not be noticeable from the distance of KOP #4. These revisions were not made to the KOP #4 visual simulation because they would not be noticeable to an observer.

#### **Yellow Bands and High Voltage Bands**

SDG&E indicated that yellow bands are inaccurately shown at the top of the proposed TSPs and that high voltage bands should be removed from the top of the TSP. There are no yellow bands including high voltage bands visible at the top of the proposed TSPs. The high voltage bands on the existing TSPs are not easily discernable and would be equally indiscernible on the proposed TSPs. High voltage bands have not been added to the proposed TSPs as they would not be easy to perceive at the scale of the simulation.

#### **138-kV Structures and TSPs**

SDG&E commented that the proposed 138-kV replacement structures and replacement TSPs (P30 and P31) are missing, and the existing 138-kV structures and TSPs are still shown west of Chicarita Substation. There are several TSPs and numerous conductors in the foreground that would obscure the proposed structures in the background near Chicarita Substation. Replacing the existing structures with the proposed TSPs in the background would not result in a noticeable change to the representation of the Proposed Project from the vantage point of KOP #4. These revisions have not been made to the simulation because the noted structures are obscured by more prominent Proposed Project features in the foreground.

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#### **TSP Color**

SDG&E noted that the proposed TSP color appears unrealistic. The proposed TSPs are modeled as galvanized metal with no treatments. The existing TSPs visible in the KOP appear to be painted green. The simulations correctly show a galvanized steel TSP with no APMs or mitigation measures incorporated; the TSP color does not require revision.

#### **Wires**

SDG&E commented that wires do not appear to connect to the structures and the spacing of the wires is incorrect. There are locations in the simulation where the wire connections are portrayed inaccurately; however, these connections are not easily discernable and are generally representative of what would be installed under the Proposed Project; the wire connections and spacing do not require revision because the changes would be nearly imperceptible to the observer.

#### **Conclusion**

The KOP #4 simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #4 visual simulation has not been revised in the Draft EIR because the requested changes would not accurately depict the project or would be imperceptible to the viewer due to other more dominant features in the simulation. The analysis in the Draft EIR concluded that the visual impact on KOP #4 would be moderate and less than significant. The modifications requested by SDG&E would not affect the determination of a less than significant visual impact at KOP #4.

D3-123 See General Response GR-3 regarding the intended use of visual simulations.

The KOP #5 visual simulation (Figure 4.2-14 of the Draft EIR) has been remodeled in response to this comment because the requested changes at KOP #5 are more noticeable due to the close proximity to the Proposed Project features. The KOP #5 visual simulation in the Draft EIR and remodeled KOP #5 simulation are provided below to document the changes that were made.

#### **TSP Arms**

SDG&E commented that the proposed TSP arms appear to be gull instead of straight in the visual simulation. See response to comment D3-118 and General Response GR-3 for information regarding TSP arms. Straight TSP arms are shown in the Figure 4.2-14 revisions. The straight TSP arms are less congruent with the existing TSP constructed with gull arms.

#### **Foundation and Base**

SDG&E commented that the foundation of the proposed TSP is not shown and the base appears to be comprised of gravel; the foundation is missing from the simulation. The grey appearance of the work area was simulated to show disturbed earth, not a gravel base. The proposed TSP foundation has been added and the

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color of the work area has been revised to appear more congruent with the existing soil in Figure 4.2-14.

#### **Conductors**

SDG&E commented that the conductors do not appear to connect to the structures and the perspective of the conductors does not appear accurate. Due to the close perspective of the Proposed Project depicted in Figure 4.2-14, the conductor connections and location have been revised to reflect these comments. These revisions are minor as shown in the revised simulation and do not change the degree of visual contrast at the KOP.

#### **Conclusion**

The KOP #5 simulation presented in Figure 4.2-14 has been revised to better represent the Proposed Project's appearance at this KOP. The requested revisions would incrementally change the visual impact of the Proposed Project from this KOP. The unity decreased as a result of the straight TSP arms. The rating conclusion of KOP #5 detailed in Appendix F: Aesthetics Resources Supporting Information of the Draft EIR has been revised from "low" (less than significant) to "moderate" (less than significant); however, the degree of visual impact remains less than significant and is not changed in the Final EIR.

D3-124 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #6 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. See the revised KOP #5 in response to comment D3-123 for a depiction of a more congruent color of disturbed soil at the base of the TSP and the revised KOP #7 in response to comment D3-125 for a depiction of the straight TSP arms to demonstrate the low and nearly imperceptible level of change that would result from these requested modifications. The optical ground wire that SDG&E commented was missing would be nearly imperceptible among the myriad of wires that are included in the simulation. The marker balls appear "floating" in the simulation because the wire holding the marker balls is partially obscured by the proposed TSP. Greater details regarding the requested changes are provided in General Response GR-3.

The KOP #6 visual simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #6 visual simulation has not been revised because the requested changes would either be unnoticeable or the simulation already accurately reflected the feature in question. The analysis in the Draft EIR concluded the visual impact on KOP #6 would be "moderately high" and significant and unavoidable. The modifications requested by SDG&E would not affect the determination of a significant and unavoidable visual impact at KOP #6.

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Draft EIR Figure 4.2-14 KOP 5 – Photosimulation (After Proposed Project) – View from Bassmore Drive Looking Northwest



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Figure 4.2-14 KOP 5 – Photosimulation (After Proposed Project) – View from Bassmore Drive Looking Northwest **(Revised)**



Note: This photosimulation is an artistic representation of the Proposed Project's appearance from a particular KOP to graphically represent project features and support an assessment of visual change. The final design of Proposed Project features and elements may differ slightly from those depicted in the simulation.

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D3-125 See General Response GR-3 regarding the intended use of visual simulations.

The Figure 4.2-18 (KOP #7) visual simulation has been remodeled in response to this comment. The KOP #7 visual simulation in the Draft EIR and remodeled KOP #7 simulation are provided below to document the changes that were made. A draft simulation was inadvertently included in the Draft EIR, and some of the requested revisions were addressed in revisions to the simulation prior to the Draft EIR.

#### **TSP Arms**

SDG&E commented that the simulation of the proposed TSP arms appear to be gull instead of straight. See response to comment D3-118 and General Response GR-3 for information regarding TSP arms. The TSP arms have been revised to straight in Figure 4.2-18. This revision did not change the visual contrast in the simulation.

#### **Marker Balls**

SDG&E commented that there are more marker balls than necessary and they appear to be “floating”. The proposed marker balls would be installed in accordance with a final FAA determination. The number of marker balls simulated in the KOPs was determined using 175 feet between each ball, which is within the recommended FAA spacing limits of 200 feet or less. The Draft EIR simulation from KOP #7 shows a greater number of marker balls than were intended because a draft version of the simulation was inadvertently included in the Draft EIR. The marker balls have been revised in Figure 4.2-18 to reflect the intended spacing and number of marker balls. See General Response GR-3 for additional information regarding “floating” marker balls.

#### **Steel H-Frame**

SDG&E commented that the existing steel H-frame pole would not be topped and the simulation depicts a topped steel H-frame pole. The steel H-frame pole has been returned to existing conditions in the revised Figure 4.2-18 visual simulation to show a non-topped pole. The difference between the existing steel H-frame and simulated H-frame is not readily noticeable in the photo because the H-frame appears in the middleground and is shorter than the TSPs and steel lattice tower in the foreground. The H-frame is not a dominant feature in the simulation and the change does not affect the visual contrast in the simulation.

#### **Foundation**

SDG&E commented that the foundation appears to be missing. The foundation should be visible from this perspective and is missing from the simulation. The foundation has been added to the proposed TSP in the revised Figure 4.2-18 visual simulation. The proposed foundation is barely visible and is small compared to the proposed TSP. The change in the foundation does not affect the visual contrast in the simulation.

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#### **Conclusion**

The visual simulation presented in Figure 4.2-18 has been revised to better represent the appearance of the Proposed Project from KOP #7. While the requested revisions reduce the clutter from the marker balls, the modifications in the simulation do not affect the rating conclusion of KOP #7 because the rating in the Draft EIR was based on the final simulation, which included fewer marker balls. As stated above, this simulation was inadvertently excluded from the Draft EIR. Refer to Appendix F: Aesthetics Supporting Information of the Draft EIR for the rating sheet. The impact on visual character would not change as a result of the modifications to the simulation. The impact remains significant and unavoidable as presented in the Draft EIR.

D3-126 See General Response GR-3 regarding the intended use of visual simulations.

The KOP #8 visual simulation (Figure 4.2-20 of the Draft EIR) has been remodeled in response to this comment. The KOP #8 visual simulation in the Draft EIR and remodeled KOP #8 simulation are provided below to document the changes that were made.

#### **Cable Pole**

SDG&E commented that the cable pole is oriented incorrectly as the cable pole depicted in the simulation appears to be oriented the opposite direction from the Proposed Project cable pole. The cable pole has been reoriented in Figure 4.2-20 to portray the Proposed Project more accurately. The height and bulk of the cable pole would be similar after reorientation and the reorientation would not change the impact on visual quality.

#### **Conductor Shroud and 230-kV Conductor**

SDG&E commented that the 230-kV conductor should be undergrounded at the cable pole and the conductor shroud on the cable pole is missing. The conductor shroud has been added to the proposed cable pole and the 230-kV terminates at the cable pole because it transitions to underground as shown in Figure 4.2-20. The conductor shroud does not noticeably change the bulk or visual appearance of the cable pole.

#### **Cable Pole Color**

SDG&E commented that the color of the cable pole appears unrealistic. See response to comment D3-122 and General Response GR-3 for information regarding pole color. The pole color in the simulation accurately reflects the color of a galvanized steel pole with no treatment. The pole color has not been revised in Figure 4.2-20.

#### **Shield Wire and 138-kV Conductors**

SDG&E commented that the shield wire and 138-kV conductors are not visible in the simulation. The shield wire and 138-kV conductors have been added to the



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Figure 4.2-18 KOP 7 – Photosimulation (After Proposed Project) – View from Maler Road Looking Northwest **(Revised)**



Note: This photosimulation is an artistic representation of the Proposed Project's appearance from a particular KOP to graphically represent project features and support an assessment of visual change. The final design of Proposed Project features and elements may differ slightly from those depicted in the simulation.

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Draft EIR Figure 4.2-20 KOP 8 – Photosimulation (After Proposed Project) – View from Black Mountain Ranch Park Looking North-Northwest



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Figure 4.2-20 KOP 8 – Photosimulation (After Proposed Project) – View from Black Mountain Ranch Park Looking North-Northwest **(Revised)**



Note: This photosimulation is an artistic representation of the Proposed Project's appearance from a particular KOP to graphically represent project features and support an assessment of visual change. The final design of Proposed Project features and elements may differ slightly from those depicted in the simulation.

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proposed TSP in the revised Figure 4.2-20 simulation. While the shield wire is visible in the revised simulation, it is not a dominant feature from KOP #8. The 138-kV conductors are minor existing visual elements that do not contribute to a change in visual quality.

#### **Conclusion**

The KOP #8 visual simulation presented in Figure 4.2-20 of the Draft EIR has been revised to better represent the Proposed Project eastern cable pole. The requested revisions do not change the impact rating at KOP #8 as detailed in Appendix F: Aesthetic Resources Support Information of the Draft EIR. The impact at KOP #8 remains moderately high and significant and unavoidable in the Draft EIR.

D3-127 See General Response GR-3 regarding the intended use of visual simulations.

The requested revision to the conductor bundling in the KOP #9 visual simulation would result in minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The KOP #9 visual simulation (Figure 4.2-22 of the Draft EIR) has not been revised because the simulation is representative of the Proposed Project appearance from the perspective of the viewer and any change to the conductor bundling would not affect the visual impact at the KOP. The analysis in the Draft EIR concluded the visual impact on KOP #9 would be “low” and less than significant. The modification to the conductor bundling would not affect the determination of a less than significant visual impact at KOP #9. See also response to comment D3-118 for a representative simulation of bundled conductor and General Response GR-3 regarding the visual impact of bundled conductor.

D3-128 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #10 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The requested changes to the tower structures are over 1,900 feet from the observer’s vantage point. This middleground perspective is 0.36 miles from KOP #10 and project feature details are most discernable in the foreground perspective. Several of the requested changes, including modifications to TSP arms, the size of the TSP cross arms and frame, and insulators, are depicted in the revised KOP #13 visual simulation (see response to comment D3-131) and demonstrate the nearly imperceptible level of change that would result from these requested modifications.

The KOP #10 simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #10 visual simulation (Figure 4.2-24 of the Draft EIR) has not been revised because requested revisions would be nearly imperceptible at the scale of the photo and would not affect the visual impact at the KOP. The analysis in the Draft EIR concluded the visual impact on KOP #10 would be “moderate” and less than significant. The modification requested by SDG&E

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would not affect the determination of a less than significant visual impact at KOP #10. Greater detail regarding accuracy of visual simulations is provided in General Response GR-3.

D3-129 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #11 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The tower structures are over 1,800 feet from the observer's vantage point. This is a middleground perspective where project feature details are not discernable to the naked eye. The requested changes to the TSP arms, TSP size, TSP cross arm angle, insulators on the steel lattice tower, and high voltage bands on the TSPs would not be noticeable at the scale of the photo. The revised simulations in responses to comments D3-118 and D3-125 demonstrate that the revisions in marker ball coloring do not affect the visual quality at the KOP due to the long distance between the viewing point and the marker balls at the edge of the simulation; the precise color of the marker balls is not discernable.

The KOP #11 visual simulation in the Draft EIR is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #11 visual simulation has not been revised because the requested changes would not be noticeable due to the distance between the KOP and the Proposed Project facilities. The analysis in the Draft EIR concluded the visual impact on KOP #11 would be "moderately high" and significant and unavoidable. The impact in the Final EIR has not been revised because the requested minor changes do not change the impact on visual quality.

D3-130 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the KOP #12 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The requested changes to TSP arms, TSP size, and insulators are depicted in the revised KOP #13 visual simulation in response to comment D3-131. The modifications to KOP #13 demonstrate the low and nearly imperceptible level of change that would result from the requested modifications to the TSP arms, TSP size, and insulators.

The KOP #12 visual simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #12 visual simulation (Figure 4.2-28 of the Draft EIR) has not been revised because the requested changes would not noticeably affect the visual quality of the simulation. The analysis in the Draft EIR concluded the visual impact on KOP #12 would be "moderate" and less than significant. The minor modifications requested by SDG&E would not affect the determination of a less than significant visual impact at KOP #12.