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D3-131 See General Response GR-3 regarding the intended use of visual simulations.

The KOP #13 visual simulation (Figure 4.2-30 of the Draft EIR) has been remodeled in response to this comment. The KOP #13 visual simulation in the Draft EIR and remodeled KOP #13 simulation are provided below to document the changes that were made.

TSP Arms

SDG&E commented that the simulation of the proposed TSP arms appear to be gull instead of straight arms. 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 the revised Figure 4.2-30 visual simulation. This revision does not noticeably change the visual contrast in the simulation.

Insulators

SDG&E commented that the I-string insulators should be removed. See response to comment D3-128 and General Response GR-3 for information regarding insulators. The I-string insulators and associated conductors have been removed in KOP #13. Removal of the I-string insulators and associated conductors does not noticeably change the appearance of the Proposed Project as there are several conductors strung parallel.

TSP Location

SDG&E commented that the location of the proposed TSP appears inaccurate and in-line with the existing steel lattice tower. The proposed TSP has been shifted to the south in the revised KOP #13 simulation to better represent the proposed location of the TSP.

Retaining Wall

SDG&E commented that: (1) the retaining wall appears to be substantially larger than proposed, (2) the road is not correctly shown increasing in height with the wall, and (3) the wall appears to be floating on the southern side. The retaining wall at this location would be approximately 5 feet tall by 116 feet wide as indicated in Table 2.3-4 of the Draft EIR. The retaining wall in the Draft EIR was simulated too tall in comparison to the surroundings. The retaining wall has been revised in KOP #13 to better represent the proposed retaining wall height and design. The reduced size of the retaining wall reduces the visual contrast in the simulation; however, the retaining wall remains an incongruent feature in the visual simulation.

Conductors

SDG&E commented that the perspective of the 230-kV conductor is incorrect and that the middle phase of the 138-kV conductor is missing. The perspective has been revised and the missing 138-kV conductor has been added to better represent the

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Proposed Project appearance from KOP #13. The addition of the 138-kV conductors is not noticeable in the simulation and does not change the impact on visual quality.

Conclusion

The KOP #13 visual simulation presented in Figure 4.2-30 of the Draft EIR has been revised to better represent the Proposed Project at this KOP. The intactness increased as a result of the revisions to the simulation because of the reduced retaining wall and TSP size. The changes to the simulation reduced the visual impact rating from KOP #13. The rating conclusion of KOP 5 detailed in Appendix F: Aesthetics Resources Supporting Information of the Draft EIR has been revised from “moderately high” (significant) to “moderate” (less than significant). The impact at KOP #13 would be less than significant.

D3-132 See General Response GR-3 regarding the intended use of visual simulations.

SDG&E revisions to the KOP #14 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR due to the distance between the KOP and the proposed structures. The requested changes to TSP arms, TSP size, and insulators are depicted in the revised KOP #13 visual simulation to demonstrate the low and nearly imperceptible level of change that would result from these minor modifications (see response to D3-131 above). The foundation in KOP #14 does appear slightly large; however, the foundation is a minor visual element in the photograph due to the distance between the viewer and the proposed TSP. Minor reduction in the foundation size would be hardly perceptible and would not affect the visual quality in the simulation. The marker ball size and spacing appears accurate in the simulation (see response to comment D3-118 regarding marker ball size and spacing). The marker ball coloring includes a fourth color as noted in response to comment D3-118; however, revisions to marker ball coloring do not affect visual quality as demonstrated in the revised simulations in response to comments D3-118 and D3-125.

The KOP #14 visual simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #14 visual simulation (Figure 4.2-32 of the Draft EIR) has not been revised because the comments include minor modifications that do not affect the dominant project features that constitute visual change. The analysis in the Draft EIR concluded the visual impact on KOP #14 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 #14. See also General Response GR-3 regarding the minor effect of the requested changes on visual quality.

D3-133 See General Response GR-3 regarding the intended use of visual simulations.

SDG&E revisions to the KOP #15 visual simulation include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR.

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Draft EIR Figure 4.2-30 KOP 13 – Photosimulation (After Proposed Project) – View from Heather Run Looking East



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Figure 4.2-30 KOP 13 – Photosimulation (After Proposed Project) – View from Heather Run Looking East **(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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The proposed structures are 1,080 feet or more from the observer's vantage point. This is a distant foreground to middleground perspective where project details are inconclusive to the determination of visual change or impact. Minor project details do not influence the presence of dominant Proposed Project features that are introduced into the landscape. Changes to TSP arms and insulators are depicted in the revised KOP #13 visual simulation to demonstrate the low and nearly imperceptible level of change that would result (see response to comment D3-131). The requested addition of a TSP foundation would not affect visual quality because of the distance to the nearest TSP and the low level of change at that TSP. The height of the second 69-kV structure in the simulation is accurately shown and any minor modifications would not be noticeable at the scale of the simulation due to the distance to the structure and because the structure is obscured by the existing steel lattice tower. The marker ball size and spacing appear accurate in the simulation (see response to comment D3-118 and General Response GR-3 regarding marker ball size and spacing). The marker ball coloring includes a fourth color as noted in response to comment D3-118; however, revisions to marker ball coloring would not affect visual quality as demonstrated in the revised simulations in response to comments D3-118 and D3-125.

The KOP #15 visual simulation is representative of the Proposed Project appearance from the perspective of the viewer. The KOP #15 visual simulation has not been revised because the requested changes would either be unnoticeable or would not affect the visual contrast due to the distance to the Proposed Project features. The analysis in the Draft EIR concluded the visual impact on KOP #15 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 #15.

D3-134 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 1 include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The comment notes that the actual design of the retaining wall and pole location have yet to be determined. The simulated location of the cable pole and height of the retaining wall are representative of Alternative 1. The 138-kV and 12-kV lines are hardly discernible and are not major elements that contribute to the change in visual quality in the simulation. While not mentioned in this comment, SDG&E supplemental information provided in comment D3-255 and Attachment B to SDG&E comments indicates that the Alternative 1 cable pole may be as tall as 210 feet. See also response to comment D3-12. While the increase in height would make the cable pole more visible from other locations, it would not affect the simulation from the selected KOP viewing point because the top of the cable pole would be outside of the frame. The simulation of Alternative 1 (Figure 4.2-40 of the Draft EIR) has not been revised because the requested changes would be

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unnoticeable and would not affect the visual quality. The modifications requested by SDG&E would not affect the determination of a significant and unavoidable visual impact at this view point.

D3-135 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 2 include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The existing steel lattice tower and Alternative 2 cable pole and fence are visually dominant elements from the viewing point. The TSP arms, optical ground wire, 138-kV conductor, and H-frame that are the focus of SDG&E comments are not major visual elements that would affect the visual quality at the KOP. The simulation is representative of the Alternative 2 cable pole from the perspective of the viewer. The simulation of Alternative 2 has not been revised because the requested changes would be unnoticeable and would not affect the visual quality. The requested modifications would not affect the determination of a significant and unavoidable visual impact at this view point.

D3-136 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 3 include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The Proposed Project TSP is shown in the middleground and is not the focus of the simulation. The existing TSPs have gull arms and there would be no modification to the existing TSPs as a result of the Proposed Project or Alternative 3. Modifications to the proposed TSP arms would not change the visual quality presented in the simulation. The TSP arms depicted in the revised KOP #1 visual simulation (see response to comment D3-118) demonstrate the low and nearly imperceptible level of change that would result from the requested modification. The comments about the cable pole design including the cross arm spacing, distribution arm, and conductors represent minor modifications that would not affect the physical bulk or presence of the KOP in the simulation. The comment regarding the 138-kV conductors not connecting is not discernible in the photo. The cable pole was simulated using the best available information at the time of Draft EIR preparation.

The simulation is representative of the proposed Alternative 3 appearance from the perspective of the viewer. Revising the appearance of the cable pole would not change the visual impact of Alternative 3 at this view point as the size and general mass of the cable pole would be similar to what is shown in the Figure 4.2-44 visual simulation. The modifications requested by SDG&E would not affect the determination of a less than significant visual impact at this view point. Refer to Section 4.2.11.2 of the Draft EIR for the analysis of impacts at the Alternative 3 eastern cable pole.

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SDG&E relocated the Alternative 3 eastern cable pole in comments on the Draft EIR (see response to comment D3-253 and Attachment B to SDG&E comments). The relocated eastern cable pole would be approximately 600 feet east of the Alternative 3 cable pole location shown in the Draft EIR. A steel H-frame structure would be located where the Alternative 3 cable pole is shown in the Draft EIR. The visual impact from the relocated cable pole would be the same as the visual impact analyzed in the Draft EIR because the cable pole height and texture would not change and it would be visible from the same road network and general locations as considered in the Draft EIR. The viewer sensitivity and baseline visual quality of the revised location are the same as the location of the Alternative 3 eastern cable pole in the Draft EIR. Viewer sensitivity would still be moderately high at this location. The suburban landscape analyzed previously is consistent with the landscape at the revised location approximately 600 feet east. The visual contrast between the proposed transmission structures and the baseline visual conditions would be moderate because the base of the cable pole would be screened by vegetation and the existing TSPs in the ROW adjacent to the eastern cable pole have a similar form to the cable pole. The cable pole, steel H-frame, and additional conductors at the revised location would result in a less than significant impact consistent with the analysis in the Draft EIR.

While the simulation in the Draft EIR depicts a cable pole at a slightly different location, the simulated cable pole provides an artistic representation of the Alternative 3 eastern cable pole and the impact on visual quality along Scripps Poway Parkway. The Alternative 3 eastern cable pole simulation (Figure 4.2-44 of the Draft EIR) has not been revised because the requested changes would not affect the determination of a less-than-significant visual impact.

D3-137 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 3 include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The minor detailed modifications to the TSP arms, retaining wall location, spur road, 69-kV structure, and conductor wires would not affect the visual quality at the KOP for the Alternative 3 western cable pole. The dominant feature that affects visual quality and results in a significant unavoidable impact at the KOP is the bulk of the cable pole, 69-kV structure, and retaining wall. The presence and bulk of these structures is unmodified by these comments.

SDG&E relocated the Alternative 3 western cable pole in comments on the Draft EIR (see response to comment D3-253 and Attachment B to SDG&E comments). The relocated western cable pole would be approximately 500 feet east-northeast of the Alternative 3 cable pole location shown in the Draft EIR. The cable pole would replace an existing steel H-frame and would be constructed adjacent to an existing steel lattice tower. The relocation of the cable pole would relocate the visual impact

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to the north of the trailhead kiosk rather than east of the kiosk. The viewer sensitivity and baseline visual quality of the revised location are similar to the location of the Alternative 3 western cable pole in the Draft EIR. Viewer sensitivity would still be high at this location because the revised location is within Los Peñasquitos Canyon Preserve and has the same viewers and quality as the location analyzed in the Draft EIR. The natural views of vegetated hills in the vicinity of the previously analyzed cable pole would be the same at the revised location. The retaining wall, cable pole, and additional conductors would still result in a significant and unavoidable impact on visual quality at the trailhead kiosk, but the impact would affect views to the north rather than east of the kiosk; however, the impact would affect the same viewer groups, recreational viewers using the trail system in Los Peñasquitos Canyon Preserve and residents near the cable pole.

While the simulation in the Draft EIR depicts a cable pole at a slightly different location, the simulated cable pole provides an artistic representation of the Alternative 3 western cable pole and the impact on visual quality in Los Peñasquitos Canyon Preserve. The Alternative 3 western cable pole simulation (Figure 4.2-46 of the Draft EIR) has not been revised because the requested changes would not affect the determination of a significant and unavoidable visual impact.

D3-138 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 4 include minor changes that would not affect the Alternative 4 impact on visual quality. These changes and their lack of impact on visual quality are detailed below. See General Response GR-3 regarding the lack of visual impact from insulators. See also the revised simulation from KOP #13 in response to comment D3-131, which demonstrates that the change in insulator type is nearly imperceptible.

Cable Pole

SDG&E commented that the design of the cable pole may be different than simulated. The cable pole was simulated using the best available information at the time of the Draft EIR preparation. Double circuit cable poles capable of split bundling the conductors would appear similar in height and bulk to the cable poles shown in the visual simulations. No revisions have been made to the simulation.

H-Frame

SDG&E indicated that the existing H-frame may be removed or the conductor removed from the eastern side of the structure. This comment is speculative because the comment indicates that the H-frame or the conductor may be removed, but is not definitive on either point. The removal of the H-frame may reduce the impact due to minimizing the bulk of the transmission poles at this location but not to less than significant because the change would be nearly imperceptible from the viewer perspective. No revisions have been made to the simulation.

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Fence

SDG&E noted that each cable pole would have a dedicated perimeter fence and the fence design may be different than simulated. The fence was simulated using the best available information at the time of Draft EIR preparation. The comment regarding the fence design is speculative because the fence design is not definitive. No revisions have been made to the simulation because the fence represents a fence of the approximate dimensions that could be used around the cable pole.

Conclusion

The simulation is representative of the proposed Alternative 4 appearance from the perspective of the viewer. The simulation of Alternative 4 has not been revised because the requested changes would not be noticeable or are speculative in nature. The modifications requested by SDG&E would not affect the determination of a significant and unavoidable visual impact at this view point. Refer to Section 4.2.12.2 of the Draft EIR for a discussion of the Alternative 4 cable pole impacts on visual quality.

D3-139 See General Response GR-3 regarding the intended use of visual simulations.

The visual simulation of the Alternative 5 eastern cable pole (Figure 4.2-50 of the Draft EIR) has been remodeled in response to this comment. The simulation of the Alternative 5 eastern cable pole was produced using the best available information at the time of the Draft EIR. The visual simulation of Alternative 5 in the Draft EIR and remodeled Alternative 5 simulation are provided below to document the changes that were made.

Cable Pole

SDG&E commented that the proposed cable pole is oriented incorrectly. The height and bulk of the cable pole would be similar regardless of orientation. The cable pole has been reoriented in this simulation to demonstrate that the orientation of the cable pole would not alter the cable pole impact on visual quality.

Steel H-Frame

SDG&E commented that the proposed steel H-frame should be a dead end pole. The proposed steel H-frame depicted is a suspension pole. There is not a substantial difference in appearance between a dead end pole and a suspension pole. The steel H-frame has been revised to a dead end pole in the revised simulation. This revision is nearly imperceptible in the revised simulation.

Fence and Retaining Wall

SDG&E commented that the retaining wall and fence appear to be substantially larger than proposed. The retaining wall at this location would be approximately 155 feet long as discussed under Section 3.5.5 and up to 12 feet in height. The retaining wall and fence have been revised to more accurately depict the height and scale of these features in relation to the surrounding vegetation. The retaining wall

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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.

Conductor Shroud

SDG&E commented that the conductor shroud on the cable pole is missing. The addition of the conductor shroud would result in a minimal change to the view due to the perspective and distance. The conductor shroud has been added to the proposed cable pole in the revised simulation. The conductor shroud and associated conductor do not substantially increase the bulk or visual appearance of the cable pole.

Conclusion

The Alternative 5 eastern cable pole simulation presented in Figure 4.2-50 of the Draft EIR has been revised to more accurately portray the Alternative 5 features at this KOP. The requested revisions do not change the impact of the Alternative 5 eastern cable pole on visual quality. The Alternative 5 eastern cable pole, dead end structure, and retaining wall would result in a significant and unavoidable impact on visual quality. Refer to Section 4.2.13.2 of the Draft EIR for a discussion of visual impacts from the Alternative 5 eastern cable pole.

D3-140 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 5 include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR.

TSP Arms

The modification to the TSP arms from curved to straight would be hardly noticeable at the distance of the KOP. See response to comment D3-118 and General Response GR-3 for information regarding the visual impact of TSP arms. Therefore, this revision has not been made to the visual simulation of the Alternative 5 I-15 crossing, which is designated as design Option 1 in the modified Draft EIR (see response to comment D2-17).

Interset Structures

SDG&E commented that only one set of cross arms and an associated circuit would be necessary as opposed to two cross arms and circuits. SDG&E indicated that the interset structures could be deadend structures instead of tangent structures and they may utilize strain insulators. The interset structures were simulated using the best available information at the time of Draft EIR preparation. The comment regarding the structure type is speculative because the comment indicates that the structure type has not been defined. The interset poles shown in the simulation are representative of interset structures that could be used. No revisions to the interset structures are necessary.

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Draft EIR Figure 4.2-50 Key View Alternative 5 Eastern Cable Pole Simulation



Figure 4.2-50 Key View Alternative 5 Eastern Cable Pole Simulation **(Revised)**



Note: This photosimulation is an artistic representation of the Alternative 5's appearance from a particular view point to graphically represent project features and support an assessment of visual change. The final design of Alternative 5 features and elements may differ slightly from those depicted in the simulation.

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Conclusion

The simulation is representative of design Option 1 for a crossing of I-15 that would include two cable poles and two interset poles. The visual simulation has not been revised because the requested changes would be unnoticeable to the viewer or are speculative due to the undetermined pole type. The modifications requested by SDG&E would not affect the determination of a less than significant visual impact at this view point because the viewer sensitivity at this location is low.

Alternative 5, I-15 Crossing Option 2

A simulation was prepared to reflect design Option 2 for a two-pole crossing of I-15 as identified in Attachment B to the SDG&E comment letter (see response to comment D2-17). The visual simulation of design Option 2 for the crossing of I-15 is provided below and has been added to the Draft EIR as Figure 4.2-53. Design Option 2 differs from the Alternative 5, I-15 crossing simulation (design Option 1) included in the Draft EIR because the interset structures are not included, the height of the cable poles increases, and the eastern cable pole shifts to a new location in the two pole crossing option. The visual simulation of design Option 2 shown below graphically represents the visual impact of the two-pole crossing option. The visual impact of the two-pole crossing option (Option 2) is very similar to the visual impact of the four-pole crossing option (Option 1, Draft EIR Figure 4.2-52). The two-pole crossing option (Option 2) would result in a moderate visual change and the resulting impact on visual quality would be less than significant.

D3-141 See General Response GR-3 regarding the intended use of visual simulations.

The requested revisions to the visual simulation of Alternative 5 western cable pole include minor changes that would be hardly discernible from the visual simulation included in the Draft EIR. The cable pole was simulated using the best available information at the time of Draft EIR preparation. SDG&E comments regarding the jumpering of the 230-kV circuits would not affect the size and general mass of the cable pole shown in Figure 4.2-44 of the Draft EIR. The base of the cable pole where SDG&E indicates a conductor shroud should be added is not visible from the KOP due to intervening topography. The visual simulation of the Alternative 5 western cable pole (Figure 4.2-54 of the Draft EIR) has not been revised because the requested modifications would be nearly imperceptible and would not affect the Alternative 5 western cable pole impact on visual quality. The impact would be less than significant with the requested minor modifications.

D3-142 Appendix F: Aesthetic Resources Support Information of the Draft EIR includes detailed ratings for each KOP. Tables F-7 and F-8 provide the basis for the determination that the change in conditions at KOPs #6 and #7 warrant a significant and unavoidable impact. As described under Section 4.2.7.1 of the Draft EIR, visual impact scores of moderately high and high are considered significant under CEQA and require mitigation. Mitigation did not reduce the visual impact scores for

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KOPs #6 and #7 to a moderate level, and the visual impact scores remain moderately high.

The requested revisions to the simulations for KOPs #6 and #7 were reviewed. The simulation for KOP #6 has not been revised because the requested modifications would not change the analysis or significance determination as described in response to comment D3-124. The simulation for KOP #7 has been revised in response to comments; however, the revised simulation does not affect the impact analysis or significance determination from KOP #7 as described in response to comment D3-125.

D3-143 Appendix F: Aesthetic Resources Support Information of the Draft EIR details the rating for each KOP. Tables F-12, F-15, and F-16 provide the basis for the determination that the visual change at KOPs #11, #14, and #15 would result in a significant and unavoidable impact on visual quality. As described under Section 4.2.7.1 of the Draft EIR, visual impact scores of moderately high and high are considered significant under CEQA and require mitigation. Mitigation did not reduce the visual impact scores for KOPs #11, #14, and #15 to a moderate level, and visual impact scores remained moderately high after mitigation. No changes to the impact analyses in the Draft EIR are necessary. See responses to comments D3-129, D3-132, D3-133 and General Response GR-3.

D3-119 The Figure 4.2-7 and Figure 4.2-8 headers have been revised in response to this comment:

Figure 4.2-7 KOP 2 – Baseline Photo (Before Proposed Project) – View from Vail Court Angelique Street Looking West Southwest

Figure 4.2-8 KOP 2 – Photosimulation (After Proposed Project) – View from Vail Court Angelique Street Looking West Southwest

All other references to Angelique Street were revised throughout the Draft EIR.

D3-144 The text in Section 4.3.2.1 of the Draft EIR has been revised to include the cultural resource testing for CA-SDI-11910, CA-SDI-18278, and CA-SDI-18437:

2014 Surveys. SDG&E's contractor ASM Affiliates (ASM) performed additional surveys to complete cultural resources inventories for work areas previously un-surveyed in 2013 (ASM 2014d-e, ASM 2014e-f, PRM 2014a). PRM conducted a limited testing program on June 20, 2014 to evaluate whether subsurface components existed at three sites along the Proposed Project alignment (PRM 2014a). The SR-56 staging yard was surveyed on October 17 and 20, 2014 (ASM 2014d). Field surveys for access roads and other work areas, including Encina Hub, were conducted from November 18 through November 21, 2014 and on December 1 and 8, 2014 (ASM 2014e-f). ASM surveyed areas within a 30-meter radius of Proposed Project impact areas and within a 10-meter radius of access roads.

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Draft EIR Figure 4.2-51 Key View of Alternative 5 I-15 Crossing Existing Conditions



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Figure 4.2-53 Key View of Alternative 5 Option 2 I-15 Crossing Simulation



Note: This photosimulation is an artistic representation of the Alternative 5 Option 2's appearance from a particular view point to graphically represent project features and support an assessment of visual change. The final design of Alternative 5 Option 2 features and elements may differ slightly from those depicted in the simulation.

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Additionally, Section 4.3: Cultural Resources of the Draft EIR has been revised to correct errors in the citations and references.

D3-145 The sentence has been revised to clarify that a variety of historic resources may be impacted:

Impacts on cultural resources would result if ground-disturbing activities cause damage, destruction, or alteration of historic ~~structures~~ resources.

D3-146 The note in Table 4.3-11 of the Draft EIR has been revised to clarify that the resource was not identified:

Notes:

- ¹ This resource was ~~evaluated~~ not identified during cultural resource surveys for the Sunrise Powerlink Project. The resource is not eligible due to insufficient data at the site (CPUC and BLM 2008).
 - ² These resources are not eligible for listing on the CRHR because the sites are destroyed.
 - ³ CA-SDI-12254 was evaluated for CRHR eligibility during cultural resource surveys for the Proposed Project because it is located in an area that overlaps with Proposed Project impact areas.
 - ⁴ Isolates are ineligible for listing on the CRHR because they lack research potential.
-

D3-147 Comment noted.

D3-148 Comment noted.

D3-149 See response to comment D2-78. The CPUC must review the Storm Water Pollution Prevention Plan (SWPPP) to ensure: (1) measures in the SWPPP do not conflict with mitigation measures prescribed by the CPUC, and (2) compliance with CEQA mitigation requirements contained in Mitigation Measure Hydrology-1. Mitigation Measure Hydrology-1 specifies that the SWPPP must be prepared in compliance with the City of San Diego Stormwater Standards Manual (2012). The City of San Diego shall therefore review the SWPPP so that they may have the opportunity to verify that the measures and procedures specified in the plan are consistent with the City's policies to reduce sedimentation and meet total maximum daily load requirements for the Los Peñasquitos lagoon. Mitigation Measure Hydrology-1 will remain as originally worded. No changes to the Draft EIR are required.

D3-150 Mitigation Measure Hydrology-1 allows SDG&E to use any groundwater extracted in the event of dewatering in several ways including: (1) irrigation of uplands, (2) as dust control, or (3) as make-up for some other construction process. This measure was designed in light of the current drought situation in California; discharge of groundwater to the sewer or stormwater system would waste water resources that could otherwise be used for irrigation, dust control, or as makeup in the construction process. Because the excavations for the foundations are limited in size, it is highly unlikely that SDG&E would encounter a large volume of water in any location that could not be managed through an irrigation system or as

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construction makeup water. No contaminated groundwater is expected to occur in the Proposed Project area because there are no known contaminants that would affect the groundwater in the area (refer to Section 4.11: Hazards and Hazardous Materials for further details on contaminants). While highly unlikely to occur, Mitigation Measure Hydrology-1 has been revised as follows to address the unlikely disposal of contaminated groundwater should it be encountered:

Mitigation Measures Hydrology-1: SWPPP and Treatment of Shallow Groundwater Discharge. SDG&E shall prepare a Stormwater Pollution Prevention Plan in compliance with the State Water Resources Control Board Construction General Permit CAS000002 (Order No. 2012-0006-DWQ) and City of San Diego Stormwater Standards Manual (2012). Project construction plans and the SWPPP shall be submitted to the CPUC and the City of San Diego for review and approval prior to construction. The SWPPP shall address erosion and sedimentation control, groundwater dewatering procedures, hazardous materials identification, handling, disposal and emergency spill procedures, and any other best management procedures necessary to prevent sediment or contaminants from entering Los Peñasquitos Creek.

Groundwater extracted during construction dewatering shall not be discharged to any surface waters or storm drains. If dewatering is necessary, the water shall either be used: (i) to irrigate upland areas, (ii) for dust control, or (iii) as makeup for a construction process (e.g., concrete production). If dewatering of contaminated groundwater is necessary, the water shall be disposed of in accordance with all applicable laws and procedures described in the SWPPP.

- D3-151 Table 4.6-4 of the Draft EIR has been revised to correct the regulatory agency. The “CCC” was defined in the list of acronyms and abbreviations as the California Coastal Commission; therefore, the abbreviation is used in Table 4.6-4.

Regulatory Agency	Total Area of Jurisdiction (approximate acres)
California Conservation Corps CCC	1.9

- D3-152 SDG&E has yet to acquire certifications under Sections 401 and 404 of the Clean Water Act. Relying on best management practices and requirements in these certifications without inclusion of a clearly defined mitigation plan demonstrating that mitigation would be effective is not permissible under CEQA (*Sundstrom v. County of Mendocino* (1988)). Mitigation Measure Hydrology-4 was included in the Draft EIR to avoid relying on another agency’s future review of impacts.

The CPUC contacted SDRWQCB to discuss the requirements in Mitigation Measure Hydrology-4 and any potential conflicts with Section 401 requirements. The SDRWQCB reviewed the requirements in Mitigation Measure Hydrology-4 and stated that a waiver of waste discharge requirements would not be appropriate for

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the project; rather, SDG&E would be required to submit and receive approval of waste discharge requirements prior to underground transmission line construction (Becker 2015). SDG&E's requested revisions have not been incorporated into Mitigation Measure Hydrology-4 or the impact assessment because the requested revisions are not consistent with standard Section 401 requirements. Mitigation Measure Hydrology-4 has been revised to resolve this conflict with Section 401 requirements in accordance with SDRWQCB's response. Jack and bore or horizontal drilling techniques would likely avoid impacts to waters subject to RWQCB jurisdiction. Neither technique is likely to require implementation of Mitigation Measure-4.

Mitigation Measure Hydrology-4 of the Draft EIR has been revised to incorporate SDG&E's request to require inspection by an aquatic resource monitor prior to starting construction activities after a rain event.

Mitigation Measure Hydrology-4: Underground Construction Only During Dry Conditions. Construction of the underground transmission line across any creeks or natural drainages shall only occur when the watercourse is dry and no less than 72 hours after any rain event. No construction shall occur within ~~100 feet of~~ any stream, or other aquatic resource within 48 hours of a rain event with a forecast of 50 percent or greater chance of precipitation. A CPUC-approved aquatic resource monitor shall evaluate all work areas where construction is on-going after a rain event to determine if conditions are dry enough to resume construction activities. No earthwork shall occur within any Water of the State prior to SDG&E obtaining ~~a waiver of~~ Waste Discharge Requirements or Section 401 Water Quality Certification from San Diego Regional Water Quality Control Board.

The analysis in Section 4.6, Impact Hydrology-1 of the Draft EIR has been revised to reflect the change to Mitigation Measure Hydrology-4 in Alternative 3 and Alternative 5.

D3-153 The helicopter lift plan has been revised to Congested Area Plan in Section 4.7.4.1 of the Draft EIR in accordance with FAA requirements:

FAA also has restrictions on helicopter flights ~~within 1,500 feet of residential dwellings carrying external loads in congested areas~~¹. Helicopter flights ~~within this area require a helicopter lift plan with external loads in congested areas~~ require submittal of a "Congested Area Plan" to the FAA (14 CFR Part 133.33).

¹ Congested area refers to a city, town, or open air assembly of people.

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- D3-154 The Proposed Project analysis in Section 4.7.8, Impact Traffic-3 of the Draft EIR has been revised to clarify that lighting and marker balls would be installed where deemed necessary by the FAA:
- The Proposed Project ~~includes lighting~~ would include lights and marker balls on all structures ~~that require FAA notification for which the FAA determines they are necessary.~~ For the purpose of analysis in this EIR, it is assumed that all structures and transmission line spans that require FAA notification could require lights and marker balls.
- D3-155 See responses to comments D2-63, D2-66, and D2-67 regarding the methodology by which traffic impacts were calculated. General Response GR-13 also contains a discussion of the methodology to calculate traffic impacts and a rationale for the conservative nature of the methodology. The Draft EIR acknowledges that the approach used was “very conservative”; refer to Section 4.7.4.1 of the Draft EIR for the discussion.
- D3-156 SDG&E did not provide the CPUC with a traffic routing plan or estimated number of construction vehicles that would travel each major route; therefore, the CPUC assumed a worst-case scenario where construction traffic would be directed down the same roadway on the same day. Even in this worst-case scenario, the traffic data indicated that the LOS and capacity of all of the analyzed roadways in the City of San Diego would not be significantly impacted; however, the impact on SR-56 would be significant due to the current LOS of F and the potential for a substantial increase in peak traffic volume. See response to comment D2-63 for further discussion of the maximum traffic per day.
- D3-157 SDG&E did not provide the CPUC with specific information regarding which staging yards would be used during each phase of construction; therefore, the CPUC assumed a worst-case scenario where construction traffic would be routed from a single staging yard. This scenario provides flexibility during construction. Even in this worst-case scenario, the traffic data indicated that the LOS and capacity of all of the analyzed City roadways from staging yards would not be significantly impacted; however, the impact on SR-56 LOS would be significant. See also response to comment D2-63.
- D3-158 The traffic analysis presented in Section 4.7: Transportation and Traffic of the Draft EIR used the methodology identified by the City of San Diego Traffic Impact Study Manual, which considered average daily traffic rather than traffic during peak hours for all roadways; however, a peak hour analysis was used for SR-56. See response to comment D2-64 for further discussion of the methodology used in the traffic analysis.
- The comment that construction will often end before the start of evening peak traffic hours (4 PM to 6 PM) is noted; however, traffic could still occur during

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morning peak hours. The San Diego and Poway noise ordinances specify that construction can occur until 7 PM and 5 PM, respectively. Because construction is allowed within peak evening traffic hours, it is assumed that construction trips would occur during peak evening traffic hours.

D3-159 The Draft EIR overstated the frequency of underground vault inspections. The description of vault inspections has been revised throughout the Draft EIR, including Section 2.4.2.2 of Chapter 2: Project Description:

Inspections of the underground transmission line segment would be conducted annually approximately every three years from the 10 new vaults.

D3-160 See response to comment D3-158 and D2-64 regarding the methodology used in the traffic analysis. The comment that construction would often avoid peak traffic hours, particularly morning peak hours (7 AM to 9 AM), is noted; however, even if construction workers arrived earlier, equipment and material deliveries are likely to occur during peak hours. The San Diego and Poway noise ordinances specify that construction can start at 7 AM. Because construction is allowed within peak morning traffic hours, it is assumed that construction trips would occur during peak morning traffic hours.

D3-161 Mitigation Measure Traffic-4 contains requirements not covered by APMs. APMs TR-3 and TR-4 specify that SDG&E will implement traffic control plans and obtain required encroachment permits to address traffic safety and potential disruptions; however, these measures do not specify the traffic procedures for conductor stringing. Mitigation Measure Traffic-4 stipulates the requirement specific to conductor stringing to avoid hazards to traffic and pedestrians. This measure was added because there was a recent incident where a utility dropped a transmission line onto a vehicle during traffic. The measure requires a review of all crossings to verify that there are adequate safety measures in place. Compliance with Mitigation Measure Traffic-4 may be easily achieved if SDG&E already implements these standard procedures as noted in the comment. The following revisions to Mitigation Measure Traffic-4 of the Draft EIR have been made to clarify the purpose of the measure:

Mitigation Measure Traffic-4: Temporary Traffic Control Measures. ~~To mitigate the risk of the conductor falling onto traveled roadways during wire stringing operations,~~ Prior to conductor stringing, SDG&E shall determine whether a temporary temporarily close roads closure or incorporate temporary support measures to protect traffic, such as guard structures or netting across roadways that would catch and support the conductor above traffic, would be necessary in the event that tension control of the conductor is lost during installation. The selected temporary measures to be incorporated shall be identified on construction plans and installed by SDG&E in advance of construction and shall remain in place until the conductor is clipped into support

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hardware on the transmission line structures. SDG&E shall implement all traffic control procedures and measures defined in Mitigation Measure Traffic-1 during installation of temporary support measures or temporary road closure.

D3-162 See response to comment D2-76 regarding the Impact Noise-3 significance determination of impacts during operation and maintenance and General Response GR-5 regarding corona noise impacts.

D3-163 Mitigation Measure Noise-1 is required to mitigate noise impacts identified in the analysis of Impact Noise-1 (compliance with federal, state, and local noise regulations) and Impact Noise-4 (temporary noise increases). The notification requirements specified in Mitigation Measure Noise-1 are based on the project-specific impacts to sensitive receptors. The distances specified in the measure ensure that residents who would be significantly impacted by construction noise are notified. Construction noise from the Proposed Project would exceed construction noise levels allowed by the City of San Diego and City of Poway municipal codes (75 dBA) as well as create a significant (greater than 10 dBA) temporary increase to ambient noise levels in the project vicinity. Construction activities, excluding helicopter activity, on Segments A, C, and D would create noise levels that exceed 75 dBA for as far as 110 feet from the construction activity; however, noise from Project construction would exceed the ambient noise levels for a much greater distance. Daytime ambient noise levels along Segment A and Segment D range from 41.6 to 50.6 dBA. Mitigation Measure Noise-1 would require SDG&E to notify residents who would experience noise levels 10 dBA greater than ambient noise, in this case 51.6 to 60.6 dBA. The CPUC recognizes that noise environments change depending on surrounding land uses. The 500-foot notification distance would ensure that receptors who experience construction noise levels of 60 dBA and greater are notified prior to construction activities.

Helicopter activity could occur within 100 feet of a residence (per SDG&E Preliminary Helicopter Use Plan) and would be even louder than ground-based construction. Noise from heavy-lift helicopters would reach 87 dBA at a distance of 300 feet and approximately 74 dBA at 1,000 feet. Helicopter noise would create a significant temporary noise increase. Notification of receptors within 1,000 feet of helicopter fly yards and flight paths is necessary to ensure that the majority of those who are significantly impacted by helicopter noise are aware of potential noise impacts.

Mitigation Measure Noise-1 requires that SDG&E post notices in public areas, including recreational use areas within 300 feet of the project alignment and construction work areas. The intent of this measure is to notify receptors that will be affected the greatest by Proposed Project construction. Posting notices at public locations such as parks and libraries, ensures that receptors who do not live in the area are notified of project activities and potential impacts.

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The CPUC understands that the timing and location of construction activities are subject to change based on a variety of factors. References to the words “specific” and “specifically” have been removed from Mitigation Measure Noise-1; however, SDG&E shall make information about the timing of specific construction and helicopter activities available to the public through the telephone hotline or through the public liaison required by Mitigation Measure Noise-1.

Mitigation Measure Noise-1: Resident Notification and Complaints. SDG&E shall provide notice by mail at least 1 week prior to construction activities to all sensitive receptors and residences within 500 feet of construction sites, staging yards, and access roads, and within 1,000 feet of helicopter fly yards and flight paths. SDG&E shall also post notices in public areas, including recreational use areas, within 300 feet of the project alignment and construction work areas. The announcement shall state ~~specifically~~ where and when construction will occur in the area. For areas that would be exposed to helicopter noise, the announcement shall provide ~~specific~~ details on the schedule of the dates, times, and duration of helicopter activities. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.

SDG&E shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring receptors, including residents, about noise construction disturbance. SDG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers. Procedures for reaching the public liaison officer via telephone or in person shall be included in the above notices and also posted conspicuously at the construction site(s). SDG&E shall address all complaints within 1 week of when the complaint is filed. SDG&E shall provide monthly reports with records of complaints and responses to the CPUC. These reports shall be provided to CPUC within 15 days of the end of the month.

- D3-164 Comment noted. SDG&E has previously received noise variances from local jurisdictions (County of San Diego 2011) and would be required to do so for construction of the Proposed Project or any alternative, if selected. SDG&E would be required to comply with variance procedures established by local authorities when a variance is needed. Within the City of San Diego, a permit can be obtained from the Noise Abatement and Control Administrator if construction activities must be conducted outside of these previously listed timeframes.
- D3-165 The Draft EIR has been revised to allow construction on Saturdays consistent with City of San Diego and City of Poway noise ordinances. See response to comment D2-59 for the changes made to the Draft EIR.
- D3-166 The noise analysis shows there will be significant impacts from corona noise under Impact Noise-1 along Segment A and Impact Noise-3 along Segment D. See

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response to comment D2-76 and General Response GR-5 for further information regarding the impacts of corona noise. SDG&E has not provided any evidence to support the statement that the controls included in the mitigation measure would not be available for use on the Proposed Project. Corona rings exist and have been installed on other transmission lines; therefore, it is reasonable to assume they could be used on the Proposed Project.

- D3-167 Section 4.8.8, Impact Noise-1 of the Draft EIR describes that corona noise produced by the proposed 230-kV transmission line will vary depending on relative humidity and precipitation consistent with this comment; however, the maximum noise level during wet conditions differs from the maximum noise level described in the comment. Refer to Section 4.8.8, Impact Noise-1 and see response to comment D2-72 and General Response GR-5 for further details on the anticipated corona noise levels.
- D3-168 Section 4.8.8, Impact Noise-1 of the Draft EIR states that noise surveys conducted during October 2013 measured nighttime ambient noise levels as high as 42 dBA on Segment D; however, ambient noise levels in the Segment D project vicinity were measured at 34.7 dBA on Hunters Glen Drive (refer to Table 4.8-3 of the Draft EIR). Response to Data Request #3 stated that corona noise from one 230-kV transmission line was measured at 40 dBA when humidity was at 47 percent (in wetter conditions, corona noise would likely be higher than 40 dBA as analyzed in Section 4.8.8, Impact Noise-3 of the Draft EIR). The increase from 34.7 dBA to 40 dBA would be a significant impact. See response to comment D2-76 and General Response GR-5 for further information regarding the impacts of corona noise along Segment D of the Proposed Project.
- D3-169 Response to Data Request #3 stated that corona noise from one 230-kV transmission line was measured at 40 dBA when humidity was at 47 percent. A humidity level of 47 percent means that it is not raining (it is raining when humidity is at 100 percent); in these conditions, rain would not mask corona noise. Even if the noise from rain were present, corona noise would still be produced and would still cause a significant impact because the noise would exceed the standard. See response to comment D2-76 and General Response GR-5 for further information regarding the impacts of corona noise along Segment D of the Proposed Project.
- D3-170 The analysis of project alternatives considers only the alternative segments of the alignment or the portion of the Proposed Project that would be replaced by the alternative. The impact analysis for alternatives does not consider the Proposed Project impacts in the remaining segments because those impacts are described in the Proposed Project impact analysis for Segments A, B, C, or D. The following

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statement has been added to the noise impact discussions for Alternatives 1 and 2 in the Draft EIR:

While noise impacts at the alternative cable pole location would be reduced, the majority of noise impacts identified for the Proposed Project would also occur under this alternative because this alternative would need to be combined with the Proposed Project in other areas.

- D3-171 Comment noted.
- D3-172 SDG&E's comment regarding use of the phrase "would remain" is noted. The word "remain" suggests that the significant impact would continue to occur after the implementation of APMs and/or mitigation measures. The wording in the Draft EIR intended to indicate that the significant impact would continue to occur after the implementation of APMs and/or mitigation measures. No changes to the Draft EIR are required.
- D3-173 The impact of the Proposed Project new structures, marker balls, and transmission lines on the recreational value of trails would be significant and unavoidable. The impact analysis aligns with and relies upon the aesthetics analysis, which is acknowledged in the impact analysis: "The impact on the recreational value of open space trails would be significant where the impact to visual quality at the trails is moderately high." Contrary to SDG&E's conclusion, visual impacts would not be "short in duration"; views of the Proposed Project from open space trails would remain throughout the life of the project. No changes to the Draft EIR are required.
- D3-174 The CPUC acknowledges that the helicopter use estimate provided by SDG&E of up to 10 months may be conservative; however, this duration is still possible based on information provided by SDG&E and is consistent with the approximate duration of helicopter use throughout the Draft EIR. For clarification, the impact analysis for the Proposed Project under Section 4.10.7, Impact Recreation-4 of the Draft EIR has been revised as follows to clarify helicopter use:
- Helicopters would be traveling along the overhead transmission corridor for approximately up to 10 months or less during construction for delivery of materials.
- D3-175 Section 4.10.7, Impact Recreation-4 of the Draft EIR has been revised as follows to clarify that impacts would remain significant after implementation of APMs if restoration is not successful:
- Impacts would remain significant after implementation of these APMs if because the restoration of temporarily disturbed areas may-is not be successful and construction noise levels would remain substantial in proximity to the equipment.

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D3-176 APM PS-5 would not reduce impacts on the physical deterioration of Black Mountain Ranch Community Park because it does not require documentation of the pre-construction conditions of the park. Because SDG&E would not have a record of the pre-construction conditions of the park, there would be no guarantee that SDG&E could return the park to approximate pre-construction conditions. Mitigation Measure Recreation-1 ensures that the pre- and post-construction conditions in the park would be documented and therefore comparable to ensure that the park is returned to approximate pre-construction conditions. This clarification has been added to Sections 4.10.8 and 4.10.9, Impact Recreation-1 of the Draft EIR:

Mitigation Measure Recreation-1 would reduce physical deterioration of the park by ~~documenting the requiring a~~ pre- and post-construction ~~conditions in the park report to document the restoration and verify that the restoration matches pre-construction conditions~~. Impacts would be less than significant with mitigation.

D3-177 The Rancho Peñasquitos Exxon leaking gas storage tank site was closed on August 15, 2015 as indicated in the comment. The Existing Hazardous Sites portion of Section 4.11.3.2 of the Draft EIR has been revised as follows to reflect the closing of the hazardous site:

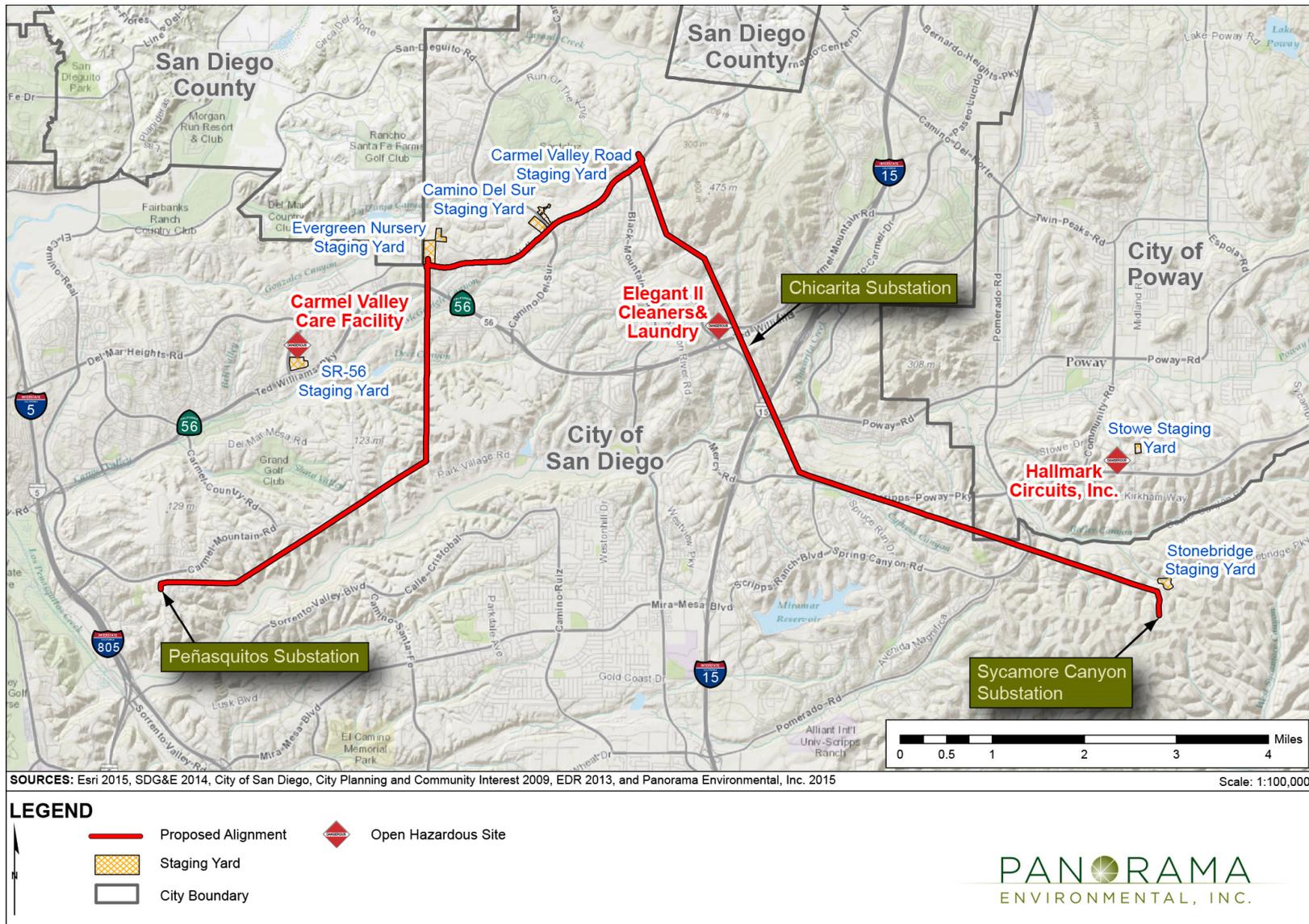
Existing Hazardous Sites

Nineteen sites were identified within 0.25 mile of Segment A in the 2013 EDR report and 2015 database search, including three open sites involving the release of hazardous materials. The three sites were reviewed further with the California SWRCB GeoTracker database. It was determined that ~~one-two~~ sites, the Sycamore Canyon Facility ~~and Rancho Peñasquitos Exxon, has have~~ in fact been completed and the cases ~~has have~~ been closed as of August 2013 (SWRCB 2015a) ~~and August 2015 (SWRCB 2015d), respectively~~. The ~~two~~ remaining open site locations ~~are-is~~ shown in Figure 4.11-1 and details for the ~~two~~ open sites ~~are-is~~ summarized in Table 4.11-1.

D3-178 The Rancho Peñasquitos Exxon leaking gas storage tank site was closed on August 15, 2015 as indicated in this comment. Figure 4.11-1 of the Draft EIR has been updated to reflect the closure of this case.

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Figure 4.11-1 Open Hazardous Sites within 0.25 Mile of the Proposed Project (Revised)



LEGEND

- Proposed Alignment
- ◆ Open Hazardous Site
- Staging Yard
- City Boundary

PANORAMA
ENVIRONMENTAL, INC.

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D3-179 The Rancho Peñasquitos Exxon leaking gas storage tank site was closed on August 15, 2015 as indicated in this comment. Table 4.11-1 of the Draft EIR has been updated to reflect the closure of this case:

Site Name and Address	Approximate Distance and Direction from Project Site	Affected Medium	Chemical of Concern	Status
Rancho Peñasquitos Exxon 12929 Rancho Peñasquitos Blvd. San Diego, CA 92129-2922	142 feet west of structure P26 work areas	Groundwater	Gasoline	Open
Elegant II Cleaners & Laundry 9912 Carmel Mountain Rd. San Diego, CA 92129	729 feet west of structure R35 work areas	Groundwater	Chlorinated hydrocarbons	Open

D3-180 The Rancho Peñasquitos Exxon leaking gas storage tank site was closed on August 15, 2015 as indicated in this comment. Impact Hazards-4 of the Draft EIR has been revised to remove references to the Rancho Peñasquitos Exxon leaking gas storage tank site. The significance conclusion for Impact Hazards-4 has been revised to “less than significant” instead of “significant” because there are no open sites that would be encountered by the Proposed Project, but there would still be one open site within 0.25 mile of the Proposed Project. Mitigation Measure Hazards-5 would no longer be required for Impact Hazards-4 since the Rancho Peñasquitos Exxon leaking gas storage tank site is closed. Table 4.11-5 and Impact Hazards-4 of the Draft EIR have been revised as follows:

Significance Criteria	Project Phase	Significance Prior to APMs	Significance after APMs and before Mitigation	Significance after Mitigation
Impact Hazards-4: Potential to be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment	Construction	Significant Less than significant	---	--- Less than significant MM Hazards-5
	Operation and Maintenance	Less than significant	---	---

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Impact Hazards-4: Would the Proposed Project have the potential to be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment? (*Less than significant-with mitigation*)

Construction

The Proposed Project area would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There ~~are two~~ is one listed hazardous material sites with an open cases within 0.25 mile of the proposed 230-kV transmission line (SWRCB 2015a; ~~2015e~~). ~~These sites are both~~ This site is located in Segment A and described in Table 4.11-1. There are also two listed hazardous material sites with open cases within 0.25 mile of the proposed Stowe and SR-56 staging yards. These sites are described in Table 4.11-3.

~~The closest open case to the Proposed Project area is a leaking underground storage tank at the Rancho Peñasquitos Exxon that is located 142 feet west of the work area for proposed TSP P26 (refer to Appendix A maps for specific pole location). This site involved a release of approximately 150 gallons of gasoline (petroleum hydrocarbon constituents) from an underground storage tank in 1988 into the soil and groundwater; therefore, there is some potential for contaminated soil and groundwater in Proposed Project excavations at TSP P26. Excavations for TSP foundations would range in depth from 20 to 40 feet. Contaminated soil and groundwater could potentially be encountered within a limited area around the point of excavation if the gasoline has spread to the area where excavation would occur. This would be a significant impact.~~

~~Mitigation Measure Hazards 5 requires testing of excavation soils prior to construction within the work area for TSP P26. If contaminated soil is determined to be present, both the excavated soil and groundwater would be treated as hazardous materials and disposed of in compliance with state and federal regulations and SDG&E operational procedures identified under APM HAZ-2. Impacts would be less than significant with mitigation.~~

The ~~second~~ closest open site is the Elegant II Cleaners & Laundry site, which has affected groundwater with chlorinated hydrocarbons. This site is located 729 feet west of the proposed pole R35 work area and at a lower elevation. Because of the distance and lower topography of the open hazardous site to the pole R35 work area, it is unlikely that groundwater or soil encountered during pole excavation would be contaminated by chlorinated hydrocarbons from the Elegant II Cleaners & Laundry site. Impacts would be less than significant. No mitigation is required.

There are two open sites located near the Stowe and SR-56 staging yards. There are no excavation activities planned at the Stowe and SR-56 staging yards.

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Because no excavation activities are planned at the Stowe and SR-56 staging yards, there is no potential for the release of hazardous materials from the use of the two staging yards. There would be no impact at these two sites.

Twenty-six additional sites were identified within 0.25 mile of the project area, all of which require no further action and are now closed. There would be no impacts from these closed sites.

Operation and Maintenance

Operation and maintenance activities would not involve excavation activities near or on an open hazardous site; therefore, it would be very unlikely that a significant hazard to the public or the environment would occur as a result of operation and maintenance activities. Impacts would be less than significant. No mitigation is required.

Mitigation Measures: None required.

Mitigation Measures: Hazards-5

~~Mitigation Measure Hazards-5. Soil and Groundwater Testing. Soil samples shall be taken from representative foundation depths prior to construction excavation for TSP P26 and shall be tested to determine the presence and extent of gasoline and other hydrocarbons. The sampling and testing plan shall be prepared and conducted by an appropriate California licensed professional and sent to a California Certified laboratory. Soil and groundwater samples shall be tested at a California Certified Laboratory. A report documenting the areas proposed for sampling, and the process to be used for sampling and testing shall be submitted to the CPUC for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for handling of excavation material found to exceed regulatory requirements shall be submitted to the CPUC 30 days prior to construction.~~

~~In the event that soils to be excavated are found to be contaminated, the excavated soil shall be treated as hazardous materials and disposed of in compliance with state and federal regulations and SDG&E operational procedures. Effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public. Regulatory agencies for the State of California (DTSC or RWQCB) and San Diego County shall be contacted by SDG&E or its contractor to plan handling, treatment, and/or disposal options.~~

Significance after mitigation: Less than significant.

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D3-181 The comment stating that the impact from hazardous material spills is overstated is noted. The analysis in the Draft EIR considers impacts prior to application of APMs and mitigation measures and considers the maximum potential for an impact to occur pursuant to CEQA. Additionally, Section 4.11: Hazards and Hazardous Materials states that most hazardous material releases are small and would not have a significant effect. The circumstances that would result in a significant effect (e.g., improper storage of blasting materials, and damage of a gas pipeline) are correctly described and analyzed in the Draft EIR. No changes to the Draft EIR are required.

D3-182 The impact analysis under Impact Hazards-1 and Impact Hazards-3 of the Draft EIR have been revised to reflect SDG&E's comment regarding when the Spill Prevention, Control, and Countermeasure (SPCC) Plan is required:

Mitigation Measure Hazards-2 requires preparation and implementation of a SPCC Plan where required by federal and State regulations. ~~The provisions of which the SPCC Plan shall~~ require that all on-site personnel receive training to prevent spills or leaks from reaching waterways and leaving Proposed Project sites.

Mitigation Measure Hazards-2 has been revised to reflect SDG&E's comment regarding referencing BMPs in the Spill Prevention, Control, and Countermeasure Plan and SDG&E's comment D3-187:

Mitigation Measure Hazards-2. Spill Prevention, Control, and Countermeasure Plan. As part of the Safety and Environmental Awareness Program (SEAP), SDG&E shall prepare a site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan for sites that are subject to the SPCC program (e.g., sites where the total aggregate capacity of aboveground oil storage containers exceeds 1,320 gallons) that will identify spill prevention and response measures and Best Management Practices (BMPs), systems, and devices. The plan will emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest water bodies).

An SDG&E-designated representative shall be identified to ensure that all hazardous materials and safety plans are followed throughout the construction period. Best Management Practices (BMPs) identified in the project Stormwater Pollution Prevention Plan (SWPPP) and spill prevention and response measures identified in the SPCC Plan shall be implemented during project construction to minimize the risk of an accidental release and to provide the necessary information for emergency response. A copy of the project SEAP shall be submitted to the CPUC at least 30 days prior to construction. All construction personnel shall be required to attend SEAP training prior to conducting any work on the project site. Training attendance sheet(s) shall be submitted to the CPUC on a monthly basis.

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D3-183 Mitigation Measure Hazards-3 requires the preparation and implementation of a Hazardous Substance Control and Emergency Response Plan (HSCERP). The HSCERP is required to address the storage and transport of small quantities of hazardous materials, including contaminated soils. The mitigation measure is required because a draft HSCERP was not provided to the CPUC prior to the Draft EIR. The mitigation measure specifies performance standards for the HSCERP to avoid deferral of mitigation.

The text of the mitigation measure and impact analysis under Section 4.11.8, Impact Hazards-1 in the Draft EIR stated that the HSCERP would be prepared as part of the SWPPP. This statement has been removed and details of waste management procedures have been added to Mitigation Measure Hazards-3 of the Draft EIR in response to SDG&E's comments D3-183, D3-188, and D3-192:

Section 4.11.8, Impact Hazards-1 and Impact Hazards-3:

Mitigation Measure Hazards-3 minimizes accidental spill impacts and hazardous materials exposure by requiring SDG&E to prepare and implement a Hazardous Substance Control and Emergency Response Plan (HSCERP) ~~as part of the project-specific SWPPP.~~

Mitigation Measure Hazards-3:

Mitigation Measure Hazards-3. Hazardous Substance Control and Emergency Response Plan. SDG&E shall prepare and incorporate methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction and post-construction operation into a Hazardous Substance Control and Emergency Response Plan (HSCERP). The HSCERP ~~shall be part of the project-specific SWPPP and~~ shall be submitted to CPUC for recordkeeping at least 30 days prior to project construction. The HSCERP measures shall require implementation of appropriate control methods and approved containment (e.g., use of partial or total enclosures, hazardous material handling methods and employee training, ventilation requirements) and spill control practices for construction and on-site hazardous material storage. All hazardous materials and hazardous wastes shall be handled, stored, and disposed of in accordance with all applicable regulations by personnel qualified to handle hazardous materials. With the exception of wood poles, the plan shall specify that all hazardous materials shall be collected and stored in project-specific containers until they are transported to an appropriately licensed and permitted waste disposal facility and transported to an SDG&E service center designated as a SDG&E consolidation site. Wood poles shall be transported off site once removed from the ground and temporarily stored in project-specific containers at an SDG&E facility. As containers are filled, poles shall be transported to an appropriately licensed Class I landfill or the compost-lined portion of a solid waste landfill.

The HSCERP measures shall also include, but not be limited to, the following:

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- Proper disposal of contaminated soils
- Daily inspection of vehicles and equipment parking near sensitive resource areas during construction and spill containment procedures
- Emergency response and reporting procedures to address hazardous material releases
- Adequate operation and safety buffering and grounding measures
- Fueling of any vehicles, equipment, and helicopters in staging yards or on streets paved with secondary containment and away from sensitive resource areas (e.g., preserves, designated open space areas, conserved habitat)

The measures shall specify that emergency spill supplies and equipment shall be available to respond in a timely manner if an incident should occur. Response materials such as oil-absorbent material, tarps, and storage drums shall be available at the project site at all times during construction and shall be used as needed to contain and control any minor releases.

D3-184 The comment stating that the impact from damage to a pipeline is overstated is noted. Section 4.11.8 of the Draft EIR clearly defines the types of activities that could damage natural gas pipelines and result in the release of natural gas. There are natural gas pipelines located within and near project work areas where subsurface construction activities would occur (e.g., underground transmission line construction and excavation for pole foundations). Dig-ins to a gas line could result in an uncontrolled release of natural gas and cause a significant impact as described in the Draft EIR.

D3-185 Mitigation Measure Hazards-1 requires that the construction contractor follow all applicable local, State, and federal blasting regulations. The measure also requires SDG&E or its contractor to prepare a site-specific blasting plan for each location for which blasting is proposed prior to any blasting activity. Mitigation Measure Hazards-1 of the Draft EIR has been revised to clarify the intent of the measure:

Mitigation Measure Hazards-1. Site Specific Blasting Plan. The construction contractor shall ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. ~~through the development and submittal of SDG&E or its contractor shall prepare~~ site-specific blasting plans, notification requirements, and monitoring procedures for each blasting location proposed as required below:

Blasting Plan. A site-specific blasting plan shall be prepared prior to rock blasting in any location where blasting is required. Each blasting plan must include noise and vibration calculations, blasting methods, surveys of existing structures and other built facilities, and distance calculations to estimate the area of effect where vibration levels would exceed 0.2 in/sec PPV or noise levels would exceed 90 dBA as a result of the blasting.

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The blasting plan shall identify a hazardous zone for people during blasting. The hazardous zone shall be defined as the area where a person could be injured or killed if they were to be located in that zone during controlled detonation. Personnel and members of the public shall be located outside of the hazardous zone. The blasting plan shall include methods to verify that personnel or members of the public are located outside of the hazardous zone. In addition, the blasting plan shall identify the trails that are adjacent to the blasting sites and that would require temporary closure during blasting activities. Finally, the blasting plan would require that SDG&E coordinate with MCAS Miramar to identify any locations where controlled detonation would be prohibited because the detonation site is located near unexploded ordnances.

Blasting plans shall be submitted to ~~the CPUC and~~ the City of San Diego for review and approval before blasting at each site. City-approved Blasting Plans shall be submitted to the CPUC for review prior to blasting at each site. SDG&E's contractor shall prepare daily blasting-related reports that include: Blast Report, Seismograph Monitoring Report, Inspection Report, Blasting Complaint Report, and Pre-Blast Inspection Report.

Notification. SDG&E shall notify all sensitive receptors within 500 feet of the area of effect at least 1 week prior to the blasting event. The notification shall include the time and location of the blasting and provide best management practices that people can use to reduce the noise level experienced at the time of the blasting (i.e., stay indoors and close windows). The notification shall include phone numbers for a public liaison and complaint hotline as required by Mitigation Measure Noise-1. SDG&E shall also alert nearby residents immediately prior to blasting by sounding warning signals/sirens.

Monitoring. Immediately prior to controlled detonation, SDG&E personnel shall visually verify that no people are located within the hazardous zone. SDG&E shall follow all required monitoring protocols described in the blasting plan.

Minimize Damage. Adjacent structures within 500 feet of blasting locations shall be surveyed prior to blasting to determine their vulnerability to damage and to document their current physical exterior condition. Blasting shall not be allowed where damage to vulnerable structures is likely to occur; a chemical agent for rock fracturing or a rock anchoring or mini-pile system shall be used instead in such circumstances. The following provisions shall be employed to minimize risk of damage to structures in the area:

- Blasting mats shall be employed to eliminate flyrock.
- SDG&E's contractor shall employ proper stemming¹ in the drill holes to control flyrock. Stemming shall be left at the top of blast holes to control/eliminate airblast.

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If any structure is inadvertently adversely affected by construction vibration, the structure shall be restored to conditions equivalent to those prior to blasting. SDG&E shall then fairly compensate the owner of any damaged structure for lost use.

D3-186 Site-specific blasting plans should be submitted to CPUC after they are approved by the City of San Diego and prior to any blasting activity. See response to comment D2-77 regarding requirements for CPUC review and approval. See response to comment D3-185 for revisions to Mitigation Measure Hazards-1.

D3-187 Mitigation Measure Hazards-2 requires SDG&E to prepare a SPCC Plan. Federal Regulation 40 CFR 112 requires an SPCC Plan, as does the California Health & Safety Code 25270. The text of the Draft EIR has been revised to clarify when a SPCC Plan would be required. To clarify when a SPCC Plan is required and the types of measures required in the SPCC Plan, Mitigation Measure Hazards-2 of the Draft EIR has been revised as shown in response to comment D3-182.

It is noted that SPCC Plans are currently in place for the Sycamore Canyon and Peñasquitos Substations.

D3-188 The requirement to prepare a HSCERP does not conflict with the State regulations listed by SDG&E in this comment. Worker training and required safeguards to protect workers and the public will still be required in accordance with applicable regulations. No revisions to Mitigation Measure Hazards-3 are necessary. See response to D3-183 regarding the need for Mitigation Measure Hazards-3 to avoid deferral of mitigation. Revisions that have been incorporated into Mitigation Measure Hazards-3 are shown in response to comment D3-183.

D3-189 The requirement that the HSCERP be included as part of the SWPPP has been removed from Mitigation Measure Hazards-3 of the Draft EIR. See response to comment D3-183 for the revised text of Mitigation Measure Hazards-3.

D3-190 The HSCERP is required to address the storage and transport of small quantities of hazardous materials, including contaminated soils. Therefore, the HSCERP should contain a description of measures that SDG&E would implement to address the proper disposal of contaminated soils. The requirement regarding contaminated soils does not conflict with State waste management regulations. No changes to the text of Mitigation Measure Hazards-3 in the Draft EIR are required.

D3-191 The HSCERP is required to address the storage and transport of small quantities of hazardous materials. Therefore, the HSCERP should contain a description of measures that SDG&E would implement to ensure daily inspections of vehicles and equipment. The text of Mitigation Measure Hazards-3 does not preclude the inclusion of appropriate measures from SDG&E's BMP Manual in the HSCERP and does not conflict with measures in SDG&E's BMP Manual. The HSCERP differs

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from the general BMPs defined in SDG&E's BMP Manual because it requires consideration of the specific equipment, work areas, and hazardous materials that would be a part of the project. No changes to the text of Mitigation Measure Hazards-3 in the Draft EIR are required.

- D3-192 The intent of Mitigation Measure Hazards-3 is to provide a clear plan for transportation of hazardous materials and management of the materials on site. Hazardous materials should be collected and consolidated in designated containers until they are transported off site. See response to comment D3-183 for revisions to Mitigation Measure Hazards-3.
- D3-193 The Draft EIR has been revised in response to the closing of the Rancho Peñasquitos Exxon leaking gas storage tank site on August 15, 2015. See responses to comments D3-177, D3-178, D3-179, and D3-180 for revisions to the Draft EIR.
- D3-194 The specified text has been deleted in response to comment D3-180. See response to D3-180 for the revised text of Impact Hazards-4.
- D3-195 The Draft EIR has been revised in response to the closing of the Rancho Peñasquitos Exxon leaking gas storage tank site on August 15, 2015. Mitigation Measure Hazards-5 would no longer be required for Impact Hazards-4 since the Rancho Peñasquitos Exxon leaking gas storage tank site is closed. See response to comment D3-180 for the revised text of Impact Hazards-4.
- D3-196 The Draft EIR has been revised in response to the closing of the Rancho Peñasquitos Exxon leaking gas storage tank site on August 15, 2015. See response to comments D3-180 for revisions to the Draft EIR.
- D3-197 The Draft EIR has been revised in response to the closing of the Rancho Peñasquitos Exxon leaking gas storage tank site on August 15, 2015. See response to comments D3-177, D3-178, D3-179, and D3-180 for revisions to the Draft EIR.
- D3-198 Section 4.12: Fire and Fuels of the Draft EIR did not identify significant impacts during operation and maintenance of the Proposed Project and no mitigation is required for the operation and maintenance phase. The Timing column of Table 9.1-1 in the MMRP of the Draft EIR has been revised to clarify the correct timing of Mitigation Measure Fire-4:

Timing:

During construction – Vegetation maintenance. [Submits annual report to CPUC about vegetation survey and treatment.](#)

~~Operation and Maintenance – SDG&E submits yearly reports to CPUC about vegetation growth~~

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To account for flexibility of the construction timeline, Mitigation Measure Fire-4 has been modified to state the following:

Mitigation Measure Fire-4: Conductor Clearance. SDG&E shall establish adequate conductor clearances prior to energizing the Project by removing all vegetation from within 15 radial feet of new and relocated overhead conductors under maximum sag and sway. Only trees and vegetation with a mature height of 15 feet or less shall be permitted within the ROW. In addition, tree branches that overhang the ROW within 15 horizontal feet of any conductor shall be trimmed or removed, as appropriate, including those on steep hillsides that may be many vertical feet above the facility. Cleared vegetation shall either be removed or chipped and spread onsite in piles no higher than 6 inches.

During Project construction, SDG&E shall maintain adequate conductor clearances by inspecting the growth of vegetation along the entire length of the overhead transmission line ~~at least once each spring~~ and documenting the survey and results in a report submitted to the CPUC ~~before June 1 of each year~~ annually during construction. Conductor clearance of 15 radial feet under maximum sag and sway shall be maintained at all times. Maximum sag and sway shall be computed based on ambient temperatures of no less than 120 degrees Fahrenheit and wind gusts of no less than 100 miles per hour.

D3-199 The purpose of Mitigation Measure Air-2 is not to reduce PM₁₀ emissions. According to the Draft EIR, "APM AIR-1 would reduce PM₁₀ emissions below the emissions threshold through regular watering of disturbed areas and covering of soils." Impacts from PM₁₀ emissions would be less than significant with implementation of APM AIR-1; therefore, Mitigation Measure Air-2 is not required to reduce PM₁₀ emissions below the threshold.

Mitigation Measure Air-2 is required to ensure that the vehicles and equipment used by SDG&E follow the assumptions SDG&E used in the air quality models and the emissions do not exceed thresholds due to the use of higher polluting equipment. Section 4.13 of the Draft EIR states:

The use of vehicles and equipment during construction that differ from assumptions used in the air quality modeling could result in a significant impact if the vehicles and equipment were to emit greater quantities of pollutants than those estimated in the air quality modeling such that emissions would contribute to an ongoing violation or cause a violation of the NAAQS or CAAQS.

Mitigation Measure Air-2 would ensure that emissions from construction of the Proposed Project would reflect emissions estimated in the air quality modeling by requiring SDG&E to use a minimum of 30 percent Tier 2 equipment. No changes to the Draft EIR are required.

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D3-200 Mitigation Measure Air-4 of the Draft EIR has been revised to allow the use of vehicles and equipment that do not meet Tier 3 standards provided SDG&E has performed and documented a good faith effort to locate vehicles and equipment that meet Tier 3 standards. Mitigation Measure Air-4 of the Draft EIR has been revised as follows consistent with previous CPUC mitigation:

Mitigation Measure Air-4: ~~Exhaust Emissions Control Plan~~ Use of Tier 3 Equipment. SDG&E shall use 2007 and newer diesel-powered equipment and use available construction equipment that meet a minimum of EPA Tier 3 emission standards. Equipment with an engine not compliant with the Tier 3 standard will be allowed only when the applicant (SDG&E) has performed and documented a good faith effort (due diligence) to locate Tier 3 or newer equipment in the Project vicinity (defined as within 200 miles of the Project site). Use of older equipment would be allowable following due diligence and associated documentation that no Tier 3 or newer equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with written correspondence (or signed statement and electronic mail) by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms providing equipment within the defined project vicinity (200 miles). Documentation of due diligence will be submitted to CPUC staff before the non-Tier 3 compliant equipment is used on the project. The applicant will submit as part of the weekly CPUC compliance report a log of all construction equipment used on the project including engine identification number and certified tier specification. The applicant shall provide information to CPUC on any equipment that may be used on the project prior to its use. ~~An Exhaust Emissions Control Plan that identifies each off road unit's certified tier specification, Best Available Control Technology, as well as the model year of all diesel-powered equipment used during construction shall be submitted to the CPUC for review and approval at least 30 days prior to construction. Construction may not commence until the Exhaust Emissions Control Plan has been approved.~~

The revision to Mitigation Measure Air-4 does not affect the analysis of impacts because the analysis did not rely upon the use of Tier 3 equipment to reduce impacts. NO_x emissions from the Proposed Project and Alternatives 1 and 2 would be less than significant and do not require Mitigation Measure Air-4. Alternatives 3 and 5 would result in significant and unavoidable impacts even after implementation of Mitigation Measure Air-4. Alternative 4 would result in less than significant impacts with implementation of Mitigation Measures Air-4 and Air-5. The purpose of Mitigation Measure Air-4 is to reduce emissions of criteria air pollutants, specifically NO_x, to the extent feasible. The revisions to the measure are consistent with the intent and application of the measure.

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- D3-201 Mitigation Measure Air-4 of the Draft EIR has been revised to remove the requirement to submit an exhaust emissions control plan 30 days prior to construction (see response to comment D3-200). This revision reflects the comment that the actual equipment that will be used on a project will not be known with specificity 30 days prior to construction. The revised mitigation measure requires detailed equipment information, including equipment specifications (engine model/year/VIN) prior to use of the equipment on the Proposed Project.
- D3-202 Mitigation Measure Air-5 of the Draft EIR has been revised to allow simultaneous underground construction provided emissions do not exceed emissions thresholds:
- Mitigation Measure Air-5: Avoid Simultaneous Underground Construction.** SDG&E shall phase construction such that 230-kV underground duct bank construction in another underground segment (i.e., Proposed Project Segment B or the Alternative 3 underground alignment) does not occur simultaneously with the 69-kV underground duct bank construction in Carmel Mountain Road and East Ocean Air Drive of Alternative 4 unless a construction phasing plan demonstrates that simultaneous underground construction will not result in an exceedance of emissions thresholds. SDG&E shall submit a construction phasing plan to the CPUC for review and approval at least 30 days prior to the start of construction in either alignment. The construction phasing plan shall document when SDG&E intends to construct the Alternative 4 underground alignment. The construction phasing plan shall include air quality emissions model outputs for a peak day of simultaneous underground construction to demonstrate that emissions will not exceed emission thresholds.
- D3-203 Amortized values for construction emissions have been added to Tables 4.14-7, 4.14-12, 4.14-14, and 4.14-16 of the Draft EIR in response to this comment. The Draft EIR analyses of GHG emissions for the Proposed Project and alternatives have been revised to replace total emissions values with amortized values.
- Proposed Project:
- As discussed previously, the emissions significance threshold of 10,000 MTCO_{2e} per year has been applied to assess the Proposed Project's impact on GHG emissions. ~~Total~~ Estimated GHG emissions from construction of the Proposed Project would be up to 2,752.92 MTCO_{2e} (amortized over the 30-year life of the project), as shown in Table 4.14-7. The ~~combined~~ emissions from ~~both years of~~ Project construction would be well below the threshold of 10,000 MTCO_{2e} per year. Therefore, impacts from GHG emissions would be less than significant. No mitigation is required.

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Table 4.14-7 Proposed Project GHG Emissions

Pollutant	GHG Emissions (metric tons)	Global Warming Potential	Annual CO ₂ Equivalent Emissions (metric tons)
Construction¹			
CO ₂	2,460.43	1	2,460.43
CH ₄	0.20	28	5.60
N ₂ O	1.08	265	286.20
<u>Total Subtotal</u>			2,752.23
<u>Amortized (over 30 years)</u>			91.74
Threshold			10,000
Exceeds Threshold?			No
Operation and Maintenance²			
CO ₂	4.06	1	4.06
CH ₄	0.00011	28	0.0031
N ₂ O	0.00011	265	0.03
<u>Total Subtotal</u>			4.09
<u>Proposed Project Total</u>			95.83
Threshold			10,000
Exceeds Threshold?			No

Notes:

¹ Estimated GHG emissions from construction reflects the combined total of all GHG emissions in 2016 and 2017.

² Estimated GHG emissions from operation and maintenance are annual.

Sources: IPCC 2013, SDG&E 2015a

Alternative 3:

As shown in Table 4.14-12, total estimated CO_{2e} emissions from construction of Alternative 3 and the connecting segments of the Proposed Project would be up to **3,622 121** MTCO_{2e} (amortized over the 30-year life of the project), which is approximately **870 29** MTCO_{2e} greater than emissions from construction of the Proposed Project. Alternative 3 would require additional run time of diesel-powered equipment to construct a longer underground transmission line. Additional equipment use accounts for the increase in GHG emissions compared to the Proposed Project. ~~The combined e~~ Emissions from ~~both years of~~ Alternative 3 construction would be well below the threshold of 10,000 MTCO_{2e} per year.

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Table 4.14-12 Alternative 3 GHG Emissions

Pollutant	GHG Emissions (metric tons)	Global Warming Potential	Annual CO2 Equivalent Emissions (metric tons)
Construction¹			
CO ₂	3,298.2	1	3,298.2
CH ₄	0.2	28	5.6
N ₂ O	1.2	265	318.0
Total Subtotal			3,621.8
Amortized (over 30 years)			120.73
Threshold			10,000
Exceeds Threshold?			No
Operation and Maintenance²			
CO ₂	4.1	1	4.1
CH ₄	0.0001	28	0.003
N ₂ O	0.0001	265	0.03
Total Subtotal			4.1
Alternative 3 Total			124.83
Threshold			10,000
Exceeds Threshold?			No

Notes:

- ¹ Estimated GHG emissions from construction reflect the combined total of emissions in 2016 and 2017.
- ² Estimated GHG emissions from operation and maintenance are annual. Emissions from Alternative 3 are assumed to be similar to emissions from the Proposed Project.

Sources: IPCC 2013, SDG&E 2015a, SDG&E 2015b

Alternative 4:

As shown in Table 4.14-14, total estimated CO₂e emissions from construction of Alternative 4 and the connecting segments of the Proposed Project would be up to ~~4,020~~ 135 MTCO₂e (amortized over the 30-year life of the project), which is ~~1,268~~ 43 MTCO₂e greater than emissions from construction of the Proposed Project. Alternative 4 would require additional run time of diesel-powered equipment to construct the underground transmission line within Carmel Mountain Road and East Ocean Air Drive. Additional equipment use accounts for the increase in GHG emissions compared to the Proposed Project. The ~~combined~~ emissions from ~~both years of~~ Alternative 4 construction would be well below the threshold of 10,000 MTCO₂e per year. Therefore, impacts from GHG emissions would be less than significant. No mitigation is required.

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Table 4.14-14 Alternative 4 GHG Emissions

Pollutant	GHG Emissions (metric tons)	Global Warming Potential	Annual CO2 Equivalent Emissions (metric tons)
Construction¹			
CO ₂	3,658.49	1	3,658.5
CH ₄	0.22	28	6.2
N ₂ O	1.34	265	355.1
Total Subtotal			4,019.8
Amortized (over 30 years)			134.99
Threshold			10,000
Exceeds Threshold?			No
Operation and Maintenance²			
CO ₂	4.06	1	4.06
CH ₄	0.00011	28	0.003
N ₂ O	0.00011	265	0.03
Total Subtotal			4.09
Alternative 4 Total			139.08
Threshold			10,000
Exceeds Threshold?			No

Notes:

- ¹ Estimated GHG emissions from construction reflect the combined total of emissions in 2016 and 2017.
- ² Estimated GHG emissions from operation and maintenance are annual. Emissions from Alternative 4 are assumed to be similar to emissions from the Proposed Project.

Sources: IPCC 2013, SDG&E 2015a, SDG&E 2015b

Alternative 5:

As shown in Table 4.14-16, total estimated CO₂e emissions from construction of Alternative 5 would be up to ~~6,611~~ 220 MTCO₂e (amortized over the 30-year life of the project), which is approximately ~~3,859~~ 129 MTCO₂e greater than emissions from construction of the Proposed Project. Alternative 5 would require considerably longer run time of diesel-powered equipment to construct the underground transmission line within 11.5 miles of roads. Additional equipment use accounts for the increase in GHG emissions compared to the Proposed Project. The **combined** emissions from ~~both years of~~ Alternative 5 construction would be below the threshold of 10,000 MTCO₂e per year. Therefore, impacts from GHG emissions would be less than significant. No mitigation is required.

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Table 4.14-16 Alternative 5 GHG Emissions

Pollutant	GHG Emissions (metric tons)	Global Warming Potential	Annual CO2 Equivalent Emissions (metric tons)
Construction¹			
CO ₂	6,175.7	1	6,175.7
CH ₄	0.4	28	11.2
N ₂ O	1.6	265	424.0
Total Subtotal			6,610.9
Amortized (over 30 years)			220.36
Threshold			10,000
Exceeds Threshold?			No
Operation and Maintenance²			
CO ₂	4.06	1	4.06
CH ₄	0.00011	28	0.003
N ₂ O	0.00011	265	0.03
Total Subtotal			4.09
Alternative 5 Total			6,615.0 224.45
Threshold			10,000
Exceeds Threshold?			No

Notes:

¹ Estimated GHG emissions from construction reflect the combined total of all GHG emissions in 2016 and 2017.

² Estimated GHG emissions from operation and maintenance are annual. Emissions from Alternative 5 would likely be less than the Proposed Project; however, 4.1 MTCO_{2e} is used as a conservative estimate.

Source: IPCC 2013, SDG&E 2015b

D3-204 Comment noted.

D3-205 Comment noted.

D3-206 APM PS-6 is an applicant proposed measure. SDG&E's requested revision would not affect the effectiveness of the measure. APM PS-6 has been revised to allow for either contracted or SDG&E fire patrol:

At the completion of each work day, construction crews will lock up and secure each worksite to prevent theft or vandalism associated with work equipment or supplies. SDG&E will also implement its project-specific fire plan, which will include ~~private~~ fire patrol monitoring as appropriate. Furthermore, SDG&E may have private security personnel monitoring construction sites where materials are stored, which may include the substations, staging yards and ROW.

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D3-207 The sentence in Impact Public Services-1 has been revised as shown below. This revision is consistent with the modification to APM PS-6 noted in response to comment D3-206 above.

SDG&E also would implement APM PS-6 as part of the Proposed Project, which would require ~~private~~ fire patrol monitoring under the project-specific Fire Prevention Plan.

The sentence in Impact Fire-1 has also been revised as follows:

APM PS-6 requires securing work sites at the end of the work day and includes ~~private~~ security and fire patrol monitoring.

D3-208 Comment noted.

D3-209 Comment noted.

D3-210 Comment noted.

D3-211 Comment noted.

D3-212 The reference to the San Diego County Agriculture Commissioner and Cal-IPC providing consultation has been deleted from Mitigation Measure Biology-3 because these organizations do not perform the consultation function in the normal course of business. Additional language has been added to Mitigation Measure Biology-3 requiring that persons with at least five years of weed control experience in San Diego County would develop weed abatement methods, practices, and treatment in the Weed Control Plan. The revised Mitigation Measure Biology-3 text is shown in response to comment A9-22.

D3-213 Mitigation Measure Biology-3 has been modified to clarify that access to areas adjacent to the ROW would be required for the pre-construction inventory. In addition, references to the San Diego County Agriculture Commissioner and Cal-IPC were deleted (see response to comment D3-212). The request to require that SDG&E prioritize preventative over manual, mechanical, or chemical methods has not been incorporated into Mitigation Measure Biology-3 because these methods would not hamper the effectiveness of controlling targeted exotic species. The requirement to monitor for new invasive weed populations is required in the mitigation measure to ensure the effectiveness of the measure and because the CPUC cannot rely on the NCCP to mitigate impacts associated with invasive weed populations. See response to comment D1-2 regarding the use of the NCCP.

D3-214, D3-215, and D3-216

The responses to comments D3-214, D3-215, and D3-216 are combined because all three comments concern revisions to Mitigation Measure Biology-6, and the comments contain overlapping concerns.

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The CPUC agrees that the Habitat Restoration Plan may include success criteria and adaptive management protocols; however, the Habitat Restoration Plan has not been prepared. Reliance on a plan that does not yet exist and performance criteria that contain no specific performance indicators such as the example provided in the comment would be considered a deferral of mitigation, which would conflict with CEQA requirements for mitigation measures (*Sundstrom v. County of Mendocino* 1988). Mitigation Measure Biology-6 therefore includes minimum performance criteria and adaptive management protocols that would be included in the Habitat Restoration Plan. The inclusion of performance criteria in the Draft EIR is necessary to ensure that habitat would be monitored effectively. To be consistent with revisions to Mitigation Measure Biology-2 (see response to comment D3-57), Mitigation Measure Biology-6 has been revised to require that monitoring is required for 5 years or until success criteria are met. No other revisions to Mitigation Measure Biology-6 are necessary with respect to the required performance criteria and adaptive management protocols contained in the measure.

Mitigation Measure Biology-6 has been revised to clarify the timeline of the approval requirement for off-site mitigation parcels. Mitigation Measure Biology-6 states that SDG&E is required to submit a Habitat Acquisition Plan that demonstrates the acquisition of off-site parcels at least 120 days prior to any ground disturbing activities. However, the time allotted for the preparation of the Habitat Management Plan has been revised to allow sufficient time for SDG&E to coordinate with the agencies and land management entities that would be involved with habitat management. Because the new timeframe allows SDG&E to start construction of the project prior to the approval of the Habitat Management Plan, additional language has been added to Mitigation Measure Biology-6 to ensure that the Habitat Management Plan would be implemented. Mitigation Measure Biology-6 states that not implementing the Habitat Management Plan would be an unauthorized activity and would require mitigation at a 5:1 ratio.

The term “pre-construction conditions” has been deleted from Mitigation Measure Biology-6 because it is poorly defined. Additional language has been added to Mitigation Measure Biology-6 to clarify that disturbed areas shall be restored according to the performance criteria described in the measure.

No changes have been made to the language regarding restoration for recontouring land because grading would occur as a part of the Proposed Project.

Habitat mitigation ratios have been revised to be consistent with the NCCP (see response to comment A2-8 for further details regarding habitat mitigation ratios).

The language regarding impacts to MSCP covered species has been modified to clarify that the reintroduction of MSCP covered species should only be considered if the reintroduction would mitigate for permanent impacts on a given species.

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Revisions to Mitigation Measure Biology-6 of the Draft EIR are provided in response to comment A2-8.

D3-217 The effectiveness criteria for Mitigation Measure Cultural Resources-1 correctly states:

Archeological monitoring is conducted during ground disturbing activities and proper measures identified in this mitigation measure are implemented if a previously undiscovered cultural resource is uncovered during construction.

No changes to the Mitigation Measure Cultural Resources-1 effectiveness criteria in the Draft EIR are required. The effectiveness criteria for APM CUL-1 in the Draft EIR has been revised to clarify that monitoring, not surveying, will be performed:

Archaeological monitor will be informed by attending meetings and ~~surveying~~ monitoring the Proposed Project area to provide an accurate archaeological monitoring results report.

D3-218 The reference to the South Coastal Information Center has been corrected in APM CUL-5:

An archaeological monitoring results report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, would be prepared and submitted to SDG&E's Cultural Resource Specialist and Environmental Project Manager following termination of the program. Any new cultural sites or features encountered would be recorded with the ~~South-Central Information~~ South Coastal Information Center (SCIC).

D3-219 and D3-220

The responses to comments D3-219 and D3-220 are combined into one response because both comments concern revisions to Mitigation Measure Cultural Resources-1. The phrase "when feasible" has not been added to Mitigation Measure Cultural Resources-1. The conditions under which preservation in place need not occur are described in the sentence that follows the requested revision: "Other methods of mitigation, described below, shall only be used if the CPUC-approved cultural resources specialist/archaeologist determines the method would provide equivalent or superior mitigation of the impacts to the resource." Mitigation Measure Cultural Resources-1 has been revised to specify that the CPUC-approved cultural resources specialist may determine that monitoring is not required if there is a low potential for cultural resources. The changes to Mitigation Measure Cultural Resources-1 of the Draft EIR are shown below.

Mitigation Measure Cultural Resources-1: Cultural Resources Monitoring, Evaluation, and Treatment of Resources. Archaeological monitoring shall be conducted during ground disturbing activities (i.e., grubbing, brushing,

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vegetation clearing, excavation, grading, etc.) in areas with high potential to discover historical and archaeological resources, as mapped on Figures 4.3-1 through 4.3-7. Monitoring teams shall work under the direct supervision of a CPUC-approved cultural resources specialist/archaeologist. Monitoring teams shall include one qualified archaeological monitor and one Native American monitor. In the event that ground disturbing activities simultaneously occur in multiple locations, a monitoring team shall be required at each location. If the CPUC-approved cultural resources specialist/archaeologist determines that the potential for cultural resources is low after initial ground-disturbance, the CPUC-approved cultural resources specialist/archaeologist may determine that monitoring is no longer required in that location.

If previously undiscovered resources are identified during construction, all construction activities within 50 feet (15 meters) of the resource shall halt, and the monitoring team shall flag-off the area and notify the equipment operator, on-site supervisor, and the CPUC-approved cultural resources specialist/archaeologist of the finds. Construction efforts shall be temporarily diverted, and the CPUC-approved cultural resources specialist/archaeologist shall evaluate the resource and determine whether it is (1) eligible for the CRHR (and thus a historic resource for purposes of CEQA); or (2) a unique archaeological resource as defined by CEQA. If the resource is determined to be neither a unique archaeological nor a historical resource, work may commence in the area.

If the resource meets the criteria for either a historical or unique archaeological resource, or both, work shall remain halted within 50 feet (15 meters) of the area of the find, and the CPUC-approved cultural resources specialist/archaeologist shall consult with CPUC staff and SDG&E's Cultural Resource Specialist regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA Guidelines Section 15064.5(b). Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources. Other methods of mitigation, described below, shall only be used if the CPUC-approved cultural resource specialist/archaeologist determines the method would provide equivalent or superior mitigation of the impacts to the resource. The alternative methods of mitigation may include data recovery and documentation of the information contained in the site to answer questions about local prehistory (see Mitigation Measures Cultural Resources-3 and Cultural Resources-4). The methods and results of evaluation or data recovery work at an archaeological find shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of treatment, as approved by the CPUC.

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If data recovery of resources is necessary, additional archaeologists shall perform the excavation while the monitoring team(s) continues to monitor construction.

D3-221 Mitigation Measure Cultural Resources-4 of the Draft EIR has been revised for consistency with PRC §5097.98:

Mitigation Measure Cultural Resources-4: Procedures for Discovery of Human Remains. In the event that human remains or suspected human remains are identified, SDG&E shall comply with California law (Health and Safety Code §7050.5; PRC §5097.94, 5097.98, and 5097.99). The area shall be flagged off and all construction activities within 50 feet (15 meters) of the find shall immediately cease. The CPUC-approved cultural resources specialist/archaeologist and SDG&E shall be immediately notified, and the cultural resources specialist/archaeologist shall examine the find. If the CPUC-approved cultural resources specialist/ archaeologist determines that there may be human remains, SDG&E shall immediately contact the Medical Examiner at the San Diego County Coroner's office. The Medical Examiner has two (2) working days to examine the remains after being notified by SDG&E. If the Medical Examiner believes the remains are Native American, he/she shall notify the Native American Heritage Commission (NAHC) within 24 hours. If the remains are not believed to be Native American, the appropriate local law enforcement agency will be notified.

The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours, the remains shall be reinterred in the location they were discovered and the area of the property shall be secured from further disturbance. If there are disputes between the landowners and the MLD, the NAHC shall mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative shall reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance. The location of any reburial of Native American human remains shall not be disclosed to the public and shall not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq., unless otherwise required by law. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r).

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D3-222 Mitigation Measure Paleontology-1 of the Draft EIR has been revised to clarify that paleontological monitoring would be conducted by a qualified paleontological monitor:

Mitigation Measure Paleontology-1: Paleontological Monitoring.

Paleontological monitoring shall be required for all ground-disturbing activities that occur in in formations determined to have a moderate to high paleontological sensitivity; ground-disturbing activities that occur areas with indeterminate, low, or marginal paleontological sensitivity may be conducted on a part-time basis at the discretion of the qualified paleontologist, and areas with zero paleontological sensitivity will not require monitoring. Paleontological monitoring shall be conducted by a qualified paleontological monitor under the direction of a CPUC-approved, qualified paleontologist. The qualified paleontologist shall have a Master's or PhD in paleontology, have knowledge of the local paleontology, and be familiar with paleontological procedures and techniques.

Paleontological monitoring shall also be required for all construction activities that require excavation, grading, or augering of 5 feet in diameter or greater at depths greater than 5 feet only in areas where these activities will disturb previously undisturbed strata in moderate to high paleontologically sensitive formations.

D3-223 All areas that would require paleontological monitoring shall be noted on both construction drawings and plans in the event that drawings and plans become separated during monitoring. No changes to Mitigation Measure Paleontology-2 in the Draft EIR are required.

D3-224 Mitigation Measure Paleontology-3 does not specify that a CPUC-approved, qualified paleontologist will make the initial discovery, rather that they will inspect the discovery after ground-disturbing work around the discovery has been halted. The following revision to Mitigation Measure Paleontology-3 has been made to clarify the procedures that only apply to "unique" resources:

Mitigation Measure Paleontology-3: Avoidance of Resources or Other Methods of Mitigation. In the event that a previously unidentified paleontological resource is uncovered during project implementation, all ground-disturbing work within 50 feet (15 meters) of the discovery shall be halted. A CPUC-approved, qualified paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, the qualified paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, part V. If the resource is determined to be unique, The determination and associated plan for protection of the resource

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shall be provided to CPUC for review and approval. If the resource is determined not to be unique, work may commence in the area. If the resource is determined to be a unique paleontological resource, work shall remain halted, and the qualified paleontologist shall consult with SDG&E and CPUC staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts to paleontological resources and shall be required unless there are other equally effective methods. Other methods may be used but must ensure that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. All recovered fossils shall be curated at an accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines (SVP 2010) standards. Work may commence upon completion of treatment, as approved by CPUC. A final summary report shall be completed. This report shall include discussions of the methods used, stratigraphy exposed, fossils collected, and significance of recovered fossils. The report shall also include an itemized inventory of all collected and catalogued fossil specimens.

D3-225 Comment noted. Mitigation Measure Fire-1 has been updated to permit exceptions to the ceasing of activities in the event that continued work would prevent fires. The revisions to Mitigation Measure Fire-1 shown below also include revisions in response to comment D3-227.

Mitigation Measure Fire-1: Final Fire Prevention Plan. SDG&E shall prepare and adhere to a Final Fire Prevention Plan (a.k.a. "Fire Plan") specifically tailored for the Proposed Project. The Final Fire Plan shall include, among other provisions, requirements for carrying emergency fire suppression equipment on all construction and employee or contractor vehicles and equipment, restricting smoking and idling vehicles, and restricting construction during red flag warnings. The Final Fire Plan shall be submitted to CPUC for approval at least 30 days prior to construction. The Final Fire Plan shall, at a minimum, include all of the provisions of the Preliminary Draft Fire Plan (Appendix I) and the elements listed below:

- During Project construction, SDG&E shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods.
- During Red Flag Warning events, as issued daily by the National Weather Service, all construction and maintenance activities shall cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities which may be allowed if the facility/equipment poses a greater fire risk if left in its current

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state. A transmission line may be tested if the loss of another transmission facility could lead to system instability or cascading outages.

- All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational in all Proposed Project work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction work site. All fires shall be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition.
- All construction personnel shall be trained in fire-safe actions, initial attack firefighting, and fire reporting. All construction personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. All construction personnel shall ~~carry at all times a laminated card~~ be provided a hard hat sticker listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on ~~contact cards~~ hard hat stickers shall be updated and redistributed to all construction personnel, and outdated ~~cards~~ hard hat stickers destroyed, prior to the initiation of construction activities on the day the information change goes into effect.

D3-226 Comment noted. As originally worded, Mitigation Measure Fire-1 allows for the use of radio and/or cellular phones as a way of communicating emergency messaging and information. No changes to Mitigation Measure Fire-1 of the Draft EIR in response to this comment are required.

D3-227 Mitigation Measure Fire-1 of the Draft EIR has been revised to include the use of hard hat stickers in place of laminated cards as indicated in response to comment D3-225.

D3-228 Mitigation Measure Fire-2 of the Draft EIR has been revised to reflect road closures and for consistency with the requirements of traffic mitigation measures.

Mitigation Measure Fire-2: Maintain Emergency Access. SDG&E and/or its contractors shall have fire suppression equipment on all construction vehicles. Construction personnel shall be required to park vehicles away from dry vegetation. SDG&E and/or its contractors shall contact and coordinate with the MCAS Miramar Fire Department and applicable local fire departments (i.e., City of San Diego and City of Poway) prior to construction to determine the appropriate amounts of fire equipment to be carried on construction vehicles and to coordinate fire suppression activities. SDG&E shall submit verification of its consultation with MCAS Miramar and local fire departments to CPUC at least 30 days prior to construction.

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SDG&E shall ensure that construction personnel, construction equipment, and aerial operations do not create obstructions to firefighting equipment or crews. Emergency ingress and egress to access roads shall ~~remain unobstructed at all times~~ be maintained per the Construction Transportation Management Plan (required by Mitigation Measure Traffic-1), and SDG&E shall notify residents and emergency personnel of road or lane closures as required by Mitigation Measures Traffic-6 and Traffic-8. Construction in the work area shall cease in the event of a fire within 1,000 feet of the work area. The work area includes the transmission line right-of-way (ROW), construction laydown and staging areas, pull sites, access roads, parking pads, and any other sites adjacent to the ROW where construction personnel are active or where equipment is in use or stored. Should a wildfire occur within 1 mile of a work area, helicopters in use by SDG&E shall immediately cease construction activities and not restart aerial operations until authorized by the appropriate fire agency.

- D3-229 Comment noted. The text in Section 9.5.2 of the Draft EIR has been included in previous MMRPs between the CPUC and SDG&E, including the Sunrise Powerlink Project. SDG&E can pass this requirement on to their construction contractors to implement. No changes to the Draft EIR are required.
- D3-230 The nest surveys timeframe in Mitigation Measure Biology-7 of the Draft EIR has been revised from 48 hours to 5 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities. See responses to comment A2-9 for the revised text of Mitigation Measure Biology-7.
- D3-231 Mitigation Measure Biology-2 of the Draft EIR has been modified to clarify that monitoring for special-status plants would be required for 5 years or until success criteria are met (see response to comment D3-57). If success criteria are not met by the end of the 5th year, monitoring shall continue beyond 5 years until success criteria are met. Mitigation Measure Biology-6 includes success criteria for the 5th year of monitoring. Mitigation Measure Biology-6 has been revised to clarify that monitoring is required, at least, until success criteria are met (see response to comment D3-216).
- D3-232 Mitigation Measure Aesthetics-2 has not been revised to eliminate the landscaping requirement for retaining walls. The measure includes landscaping because the use of appropriately colored blocks would not sufficiently mitigate the aesthetic impact from installation of the retaining walls. The requested revisions to only require irrigation where water is available will not be incorporated into the mitigation measure either. The measure has been revised to include the use of drought-tolerant native vegetation to minimize water use. See response to comment D2-55 regarding the feasibility of irrigation and the revision to Mitigation Measure Aesthetics-2.

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- D3-233 Many of the existing TSPs within portions of Segment A of the Proposed Project include color treatment. It is necessary to reduce visual contrast and match the form, line, and color of existing structures to the extent feasible in order to mitigate visual impacts. Because the existing TSPs within portions of Segment A include color treatment, the mitigation requires color treatment to match the existing facilities and reduce visual contrast. No revisions to Mitigation Measure Aesthetics-3 of the Draft EIR are required.
- D3-234 Mitigation Measure Aesthetics-4 has not been revised to eliminate the landscaping requirement for cable poles. The requested revision to only require irrigation where water is available will not be incorporated into the mitigation measure either. Irrigation of newly planted native vegetation is feasible through either the placement of a water tank/large bucket(s) with a gravity fed irrigation system or routine irrigation from a water truck. Mitigation Measure Aesthetics-4 of the Draft EIR has been revised to reduce water use through the use of drought-tolerant plants as shown in response to comment A9-32.
- D3-235 Table 9.1-1 incorrectly quoted the final wording of Mitigation Measure Aesthetics-5, which was correct in Section 4.2: Aesthetics of the Draft EIR. The modification below is consistent with the final wording of Mitigation Measure Aesthetics-5.

<p>Mitigation Measure Aesthetics-5: Nighttime Lighting. SDG&E shall ensure that all nighttime lighting used for construction is shielded, pointed down, and directed away from surrounding properties and adjacent natural habitats. For operation and maintenance, all flashing red strobe lights required on tower structure shall be synchronized to flash at the same time as other strobe lights in the same viewshed.</p>	<p>CPUC verifies that SDG&E points nighttime lights down, installs shields on lights, and directs lights away from surrounding properties and adjacent natural habitats, and synchronizes the timing of red strobes to other strobes in the viewshed.</p>	<p>Visual effects of glare are reduced by shielding and pointing lights downward and synchronizing red strobes.</p>	<p>During construction – Nighttime lighting during construction Operation and Maintenance – Synchronization of red strobes</p>	<p>All locations with nighttime lighting and all poles with red strobes</p>
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- D3-236 Mitigation Measure Geology-1 has not been deleted. The Geotechnical Study prepared by Trinity Geotechnical Engineering, Inc. may fulfill the requirements of the measures for the Proposed Project; however, design-level geotechnical surveys would still be required if the CPUC approves construction of an alternative to the

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Proposed Project. The Proposed Project impact analysis has been updated in Section 4.5: Geology, Soils, and Mineral Resources of the Draft EIR to reflect the information in the Geotechnical Study, which was provided as Attachment B, Exhibit 12 to SDG&E's comment letter.

D3-237 Mitigation Measure Geology-2 has not been deleted. The Geotechnical Study prepared by Trinity Geotechnical Engineering, Inc. may fulfill the requirements of the measures for the Proposed Project; however, design-level geotechnical surveys would still be required if the CPUC approves construction of an alternative to the Proposed Project. The Proposed Project impact analysis has been updated in Section 4.5: Geology, Soils, and Mineral Resources of the Draft EIR to reflect the information in the Geotechnical Study, which was provided as Attachment B, Exhibit 12 to SDG&E's comment letter.

D3-238 Mitigation Measure Geology-3 has not been deleted. The Geotechnical Study prepared by Trinity Geotechnical Engineering, Inc. may fulfill the requirements of the measures for the Proposed Project; however, design-level geotechnical surveys would still be required if the CPUC approves construction of an alternative to the Proposed Project. The Proposed Project impact analysis has been updated in Section 4.5: Geology, Soils, and Mineral Resources of the Draft EIR to reflect the information in the Geotechnical Study, which was provided as Attachment B, Exhibit 12 to SDG&E's comment letter.

D3-239 The comment regarding the application process to construct the Proposed Project within MCAS Miramar is noted. The requirement to conduct a pre-construction survey is consistent with protocols for "anomaly avoidance," a term which may be used to describe avoidance of unexploded ordnance, specified in NAVSEA OP 5. Mitigation Measure Hazards-6 of the Draft EIR has been revised to include provisions consistent with MCAS Miramar protocols regarding unexploded ordnance.

Mitigation Measure Hazards-6. Unexploded Ordnance Investigation. As part of the NEPA review and Tier 1 application process required for construction within MCAS Miramar, SDG&E shall comply with Naval Sea Systems Command (NAVSEA) OP 5 safety requirements for shore-based operations. SDG&E shall perform a survey of identified Formerly Used Defense Sites (FUDS) database sites prior to the start of construction to identify potential unexploded ordnance locations. SDG&E shall obtain a trained contractor for the pre-construction survey, personnel training, and removal of all unexploded ordnance that are found in the Project area. An unexploded ordnance investigation of known and potential areas used by the military along the ROW shall be undertaken by a trained contractor. If unexploded ordnance are found, they shall be removed by the trained personnel contractor. To comply with NAVSEA OP 5 requirements,

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All personnel involved in excavation, grading, or ROW clearing shall be educated by the trained contractor to recognize unexploded ordnance.

- D3-240 The monitoring/reporting action and the effectiveness criteria of the Draft EIR has been revised to be consistent with Mitigation Measure Hydrology-3:
- Monitoring/Reporting Action:**
CPUC verifies that SDG&E uses reclaimed ~~or potable~~ water, and not groundwater for operation and maintenance activities.
- Effectiveness Criteria:**
Reclaimed ~~or potable~~ water is used for operation and maintenance activities.
Groundwater is not used for operation and maintenance activities.
- D3-241 Requiring SDG&E to use exclusively recycled water is feasible because there is enough supply available from the reclamation plant. Although there are infrastructure constraints, SDG&E could establish a meter somewhere along the transmission alignment to alleviate water accessibility concerns. The CPUC confirmed this possibility with the City of San Diego (Partow 2015). No revisions to Mitigation Measure Utilities-1 of the Draft EIR are required.
- D3-242 The CPUC agrees that the appropriate resource agencies should determine mitigation ratios for impacts to vernal pools. The appropriate agencies (CDFW and USFWS) require mitigation of impacts to vernal pools at a 3:1 ratio, which is specified in Mitigation Measure Biology-4 (refer to pages 4 and 5 of the NCCP clarification document for vernal pool mitigation measures).
- D3-243 Mitigation Measure Noise-2 of the Draft EIR has been revised to address the possibility that roadway oversight agencies would not allow sound walls or acoustic blankets in some areas during construction (see General Response GR-9). The distances specified in Mitigation Measure Noise-2 are based on the Project-specific noise impacts to sensitive receptors. SDG&E would be required to employ noise-reduction techniques when stationary equipment (e.g., generator) is located within 200 feet of residences and within 300 feet of schools. Mitigation Measure Noise-2 has also been revised to allow for relocation of residents that would be affected by construction noise during the duration of the noise-generating activity. Impacts would remain significant and unavoidable even after implementation of Mitigation Measure Noise-2 as described in the Draft EIR because residents who deny relocation would experience a significant temporary increase in ambient noise levels and sound walls or acoustic blankets could not be installed at every location where construction noise would be produced. Revisions to Mitigation Measure Noise-2 do not change the impact conclusions in the Draft EIR.

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D3-244 Mitigation Measure Noise-3 of the Draft EIR has been revised to reflect the City of San Diego construction noise hours of 7 AM to 7 PM:

Mitigation Measure Noise-3: Helicopter Take-off and Landing Areas.

Helicopter takeoff and landing areas shall be located a minimum of 300 feet from the nearest sensitive receptor. Helicopter takeoff and landing shall only occur from the hours of 7 AM to 7 PM in the City of San Diego and 7 AM to 5 PM in the City of Poway. No helicopter takeoff and landing areas shall be permitted at the Evergreen Nursery staging yard due to the close proximity of sensitive receptors adjacent to this staging yard.

D3-245 SDG&E has suggested changes to Mitigation Measure Noise-6 based on existing regulations that apply when helicopter activities are conducted near schools. The requirements specified by SDG&E in this comment have been added to Mitigation Measure Noise-6 of the Draft EIR.

SDG&E has commented that area schools are in session year-round and that Mitigation Measure Noise-6 lacks clarity on when the measure applies. Mitigation Measure Noise-6 states that helicopter activities near schools and construction within 300 feet of a school may occur before or after school, as well as during lunch hours. Construction may also occur on Saturdays, minor holidays as allowed by City ordinance, and non-instructional days, or during summer, winter, or spring breaks. SDG&E must coordinate with local schools to identify breaks and instruction period schedules. Mitigation Measure Noise-6 of the Draft EIR has been revised to more clearly state when this measure applies.

The CPUC agrees that trenching activities are not part of helicopter operations; however, the intention of the mitigation measure is to reduce noise impacts on sensitive receptors within 300 feet of transmission line construction activities, and trenching activities are part of transmission line construction activities. The title of Mitigation Measure Noise-6 has been revised to clarify the intent of the measure. The 5 dBA restriction is removed from Mitigation Measure Noise-6 and replaced with the 1,000-foot distance requirement for coordination with schools. Mitigation Measure Noise-6 of the Draft EIR has been revised as follows:

Mitigation Measure Noise-6: Coordinate ~~Helicopter Construction~~ Activity with Schools. SDG&E shall coordinate with local schools at least 48 hours prior to helicopter and construction activities within 1,000 feet of a school to schedule helicopter activities and transmission line construction activities, including power pole installation and trenching activities. SDG&E shall file a Congested Area Plan with the FAA (see Mitigation Measure Traffic-2) and file all relevant helicopter information with the Department of Transportation Aeronautical Division when using helicopters to conduct transmission line construction activities with 1,000 feet of a school. No activities shall be allowed within 300 feet of school properties at times when classes are in session. Helicopter activities and

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construction near schools shall be conducted outside of active instruction periods (e.g., before school, after school, during lunch or classroom breaks). Schools shall be notified of any helicopter activities that would ~~increase the noise level at classrooms by 5 dBA or more occur within 1,000 feet of school property~~ at least 30 days prior to helicopter use.

D3-246 Mitigation Measure Traffic-2 has been retitled and revised in accordance with FAA requirements for Congested Area Plans:

Mitigation Measure Traffic-2: ~~Helicopter Lift Plan Congested Area Plan~~. Prior to construction, helicopter contractors shall coordinate helicopter activities for the project with the regional FAA office and obtain any required approvals to operate helicopters. FAA coordination shall include submittal of a ~~Helicopter Lift Plan Congested Area Plan~~ prepared by the helicopter operator to obtain approval for the helicopter operations for all routes ~~within 1,500 feet of residences or~~ that would cross over “congested areas” as described in 14 CFR 133.33. The ~~Helicopter Lift Plan Congested Area Plan~~ will identify ~~the location of the lift,~~ anticipated work dates, a detailed description of the work to be performed, ~~any required notifications or coordination to local agencies or adjacent property owners to restrict work area access,~~ any safety hazard control measures that are required, and appropriate emergency procedures and emergency landing area(s). Helicopter contractors shall provide the CPUC with all required approvals, documents, and conditions of work prior to conducting helicopter activities for the project.

D3-247 See response to comment D3-161 for revisions to Mitigation Measure Traffic-4. Mitigation Measure Traffic-4 has not been deleted because it specifies measures not included in APMs, which would reduce significant impacts.

D3-248 See General Response GR-12 for revisions to Mitigation Measure Traffic-6. The phrase “on major roadways” has been removed from Mitigation Measure Traffic-6 to clarify that lane closures or obstructions on any roadway, not just major roadways, must occur during off-peak traffic hours due to traffic impacts on residential neighborhoods and schools where roads may not be considered major.

D3-249 See responses to comments D3-149 and D3-150 for revisions to Mitigation Measure Hydrology-1.

D3-250 See response to comment D3-152 for revisions to Mitigation Measure Hydrology-4.

D3-251 Mitigation Measure Air-3 of the Draft EIR has been revised to clarify that SDG&E must cease earthmoving activities only when sustained winds exceed 20 miles per hour:

Mitigation Measure Air-3: Dust Control Management Plan. SDG&E shall submit a Dust Control Management Plan to the CPUC for review and approval

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no less than 30 days prior to construction. The Dust Control Management Plan shall contain measures that provide for conformance to SDAPCD Rule 55 requirements including:

1. No person shall engage in construction or demolition activity in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60 minute period; and
2. Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall:
 - i. Be minimized by the use of any of the following or equally effective track-out/carry-out and erosion control measures that apply to the project or operation: track-out gates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; and for outbound transport trucks: using secured tarps or cargo covering, watering, or treating of transported material; and
 - ii. Be removed at the conclusion of each work day when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any track-out/carry out, only PM₁₀-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

Measures to comply with visible dust emissions restrictions could include:

- Watering or applying soil stabilizers to areas with loose dust
- Ceasing earthmoving activities when sustained (i.e., a period or periods of time aggregating more than 3 minutes in any 60 minute period) wind speed exceeds 20 miles per hour
- Covering soil stockpiles

D3-252 See response to comment D3-241 regarding the feasibility of using only recycled or reclaimed water for construction purposes. No changes are required in the Draft EIR.

D3-253 SDG&E provided minor engineering and design refinements to the Proposed Project disturbance areas (refer to comment letter Attachment B, Exhibits 1 through 3). A comparison between the impacts presented in the Draft EIR and the impacts generated using the refined project assumptions can be found in General Response GR-15. In summary, the refinements reduce the vegetation community impacts by 1.42 acres, or 4 percent, as compared to what was analyzed in the Draft EIR. The reductions to vegetation community impacts associated with the project refinements would not substantially change the impact analysis. The refinements

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have not been incorporated because the Draft EIR analysis of vegetation community impacts is conservative. Final engineering designs of the Proposed Project, if approved by the CPUC, may further reduce vegetation community impacts.

D3-254 Comment noted.

D3-255 SDG&E provided minor engineering and design refinements to Alternative 3 (or Alternatives 3 and 4 in combination) and Alternative 5 (refer to comment letter Attachment B, Exhibits 4 through 11). These refinements reduce the overall vegetation community impacts associated with these alternatives; however, the refinements have not been incorporated because the Draft EIR analysis of vegetation community impacts is conservative. Final engineering designs of any of the alternatives, if approved by the CPUC, may further reduce vegetation community impacts. Responses to individual exhibits found in comment letter Attachment B are provided below.

Exhibits 4 and 6

The CPUC has considered the proposed revisions to the Alternative 3 eastern and western cable pole permanent and temporary impact areas. Permanent and temporary vegetation community impacts would be similar to or less than those depicted in Appendix E: Detailed Alternative Route Maps of the Draft EIR. The reductions to vegetation community impacts associated with the project refinements would not substantially change the impact analysis. Furthermore, aesthetics impacts of the revised cable pole locations would not be reduced when compared to the original locations depicted and analyzed in the Draft EIR. Therefore, these refinements have not been incorporated into the Draft EIR analysis. Final engineering designs of Alternative 3, if approved by the CPUC, may further reduce vegetation community impacts.

Exhibit 5

See response to comment D3-12 regarding the height revision to the Alternative 1 cable pole. See response to comment D2-17 regarding the two new options proposed for the Alternative 5 crossing of I-15.

Exhibit 7

The CPUC has considered the proposed replacement of an H-frame structure under Alternative 5 and the impact areas from the replacement. The proposed shifts in the size and shape of temporary and permanent work areas associated with the Alternative 5 refinement are comparable to what was analyzed in the Draft EIR and would not substantially change the impact analysis; therefore the refinements have not been incorporated as the Draft EIR.

Exhibit 8

See response to comment D2-17 regarding the two new options proposed for the Alternative 5 crossing of I-15.

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Exhibit 9

The CPUC has considered the proposed revisions to the Alternative 5 western cable pole (CC MM PP) impact areas. The proposed shifts in the cable pole location and the size and shape of temporary and permanent work areas are comparable to what was analyzed in the Draft EIR and would not substantially change the impact analysis; therefore the refinements have not been incorporated as the Draft EIR.

Exhibit 10

See response to comment D3-12 regarding the height revision to the Alternative 1 cable pole.

Exhibit 11

See response to comment D3-15 regarding the newly proposed Alternative 5 staging yards.

D3-256 Comment noted.

D3-257 The vegetation mapping for Alternative 5 shown in Figure G-5 in Appendix G has been updated as shown on the maps below; these revisions are discussed in detail below. The detailed mapping generally reflects the presence of developed or disturbed habitat in areas that were previously mapped as sensitive vegetation communities within the Alternative 5 alignment. To address SDG&E's comments on the vegetation mapping, a field review was conducted in late December 2015 by biologist, Larry Sward of Helix, Inc.

The following changes have been made to Map 2 of 6:

- The vegetation mapping for access roads were updated to the bare ground classification.
- The areas outside of developed lands, which were originally mapped as nonnative grassland, were changed to two classifications: disturbed habitat and Diegan coastal sage scrub.
- Portions of southern riparian woodland that were mapped in the southern portion of the BSA were changed to two classifications: developed lands and disturbed habitat.

The revised Figure G-5, Map 2 of 6, with the revisions described above, is shown below.

The following changes have been made to Map 4 of 6:

- The southern riparian forest and coastal valley freshwater marsh designated over Sorrento Valley Boulevard were re-labeled developed lands. The area just north of Sorrento Valley Boulevard was re-labeled a mix of southern riparian forest, southern riparian scrub, freshwater marsh, southern willow scrub, and nonnative grassland.

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- The area south of Sorrento Valley Boulevard was originally mapped as freshwater emergent wetland in Figure G-6; however, this area is mostly a mix of upland and wetland habitat. Both Figure G-5, Map 4 of 6 and Figure G-6 have been updated to reflect these new changes.
- The area north of Lusk Boulevard was re-mapped as disturbed habitat, nonnative grassland, and developed lands.
- The vegetation mapping for access roads were updated to the bare ground classification.

The revised Figure G-5, Map 4 of 6, with the revisions described above, is shown below.

The following changes have been made to Map 5 of 6:

- The southern riparian forest and coastal valley freshwater marsh labelled over Sorrento Valley Boulevard were re-labeled developed lands.
- The residential area that was labeled as nonnative grassland was changed to developed lands.
- Some areas originally labeled non-native grassland and Diegan coastal sage scrub were re-mapped as disturbed habitat.

The revised Figure G-5, Map 5 of 6, with the revisions described above, is shown below.

Revisions to the vegetation mapping for Alternative 5 do not affect the impact conclusions in the Draft EIR. As stated above, sensitive vegetation communities were re-mapped as disturbed or developed habitat; therefore, the impact would be slightly reduced due to the minor reduction in impacts to sensitive habitats.

- D3-258 The underground areas of Alternatives 3, 4, and 5 are located on paved roads. There are no vegetation communities on these paved roads; therefore, no maps showing vegetation communities are provided in Appendix G: Biological Resources Supporting Information of the Draft EIR. The assessment of indirect impacts to wildlife from noise and fugitive dust considers the presence of natural habitat areas that could provide suitable habitat adjacent to the Alternatives 3, 4, and 5 underground alignments.

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Figure G-5 Alternative 5 Vegetation Communities and Special-Status Plants in the Biological Survey Area (Map 2 of 6) (Revised)



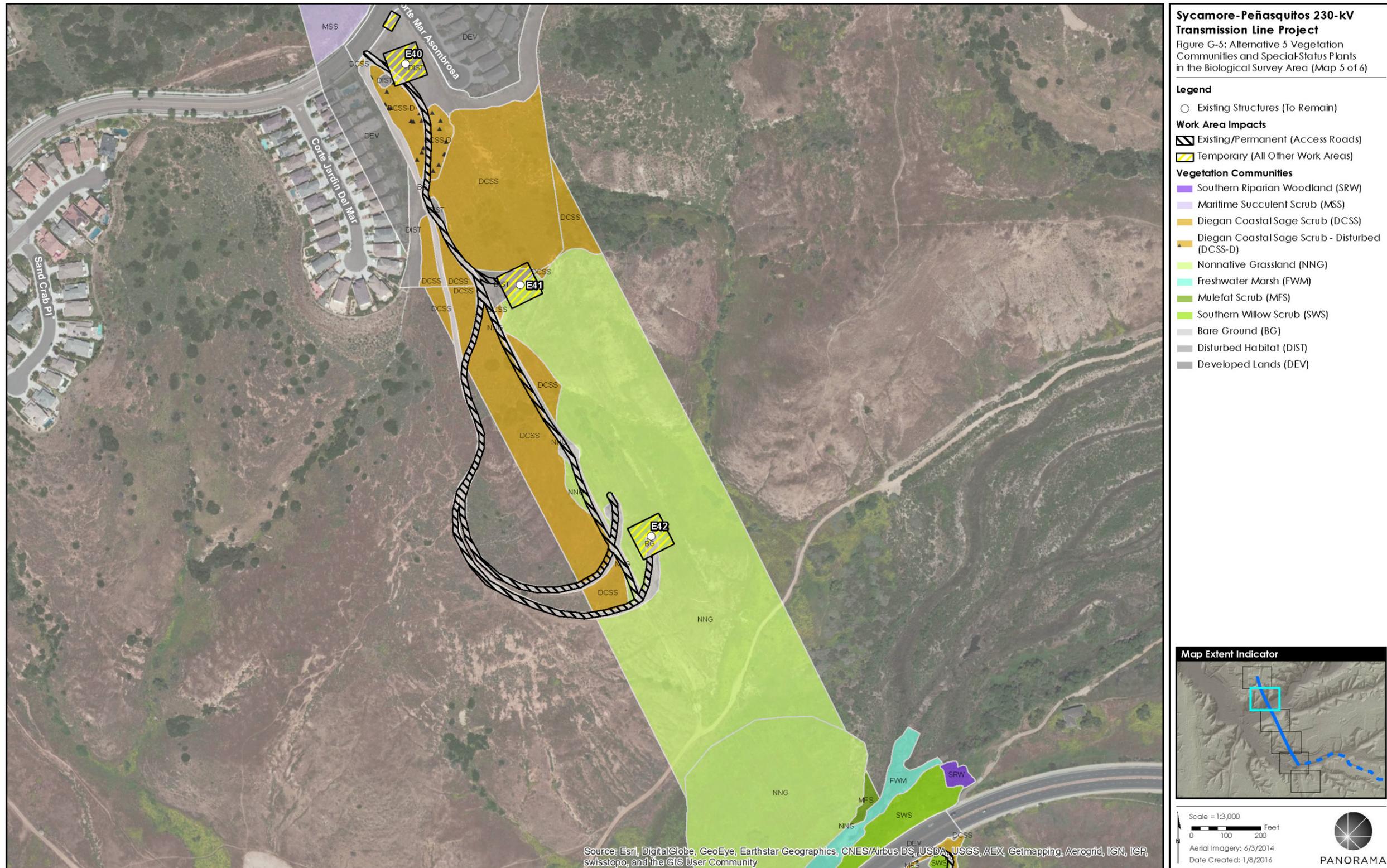
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Figure G-5 Alternative 5 Vegetation Communities and Special-Status Plants in the Biological Survey Area (Map 2 of 6) (Revised)



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Figure G-5 Alternative 5 Vegetation Communities and Special-Status Plants in the Biological Survey Area (Map 5 of 6) (Revised)



3 COMMENTS AND RESPONSES

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