

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.1.4	E.1.4-6	6th row down	Under Campo North Option in chart, "tribal" should be included under Land Use Classifications, and "Campo Reservation" should be included under Specific Land Uses, since this option still runs through the Campo reservation	E0003-129
E.1.4	E.1.4-7	6th row down	Under Campo North Option in chart, should be "CN 0-1.4" not "NC", "CN" is denoted on maps	E0003-130
E.1.4	E.1.4-13	1	Clarification is needed for a described situation in which Mitigation L-1a could not be implemented: "there may be situations where the alignment or facility components cannot be relocated" is identified as an impact upon future development, and a conclusion is made that this impact is not mitigable. SDG&E will work with property owners who are in the process of developing their properties to minimize construction and operations related impacts to reduce or mitigate impacts to the extent feasible. This would reduce the identified impact to significant and mitigable and reduce to Class II.	E0003-131
E.1.4	E.1.4-14	1	Text makes reference to I-8 Substation Figure Ap. LU E.1.8, but the figure cannot be found in the text or appendix.	E0003-132
E.1.4	E.1.4-14	5	Text should be updated to indicate that although the Campo tribe suggested a re-route to the north of I-8, they currently support none of the southern alternatives	E0003-133
E.1	E.1.4.-15	4	Additional clarification is needed regarding the determination of a Class I impact. A conclusion of a Class I impact for future development was made (Impact L2) with no discussion or supporting documentation as to why the impact would be significant and not mitigable.	E0003-134
E.1	E.1.4-15, E.1.4-8, E.1.4-22, E.1.4-23	3, 4, 4, 6	With regard to temporary construction impacts, for example, the following statement is made: "While this disturbance would be short-term and temporary at any one location, impacts would be significant if construction was not carefully managed and residents not kept informed." Successful construction management techniques and informing the public of construction activities could fully mitigate impacts. Suggest phrasing the sentence to read: "while this disturbance would be short-term and temporary at any one location, impacts would not be significant as long as construction was carefully managed and residents kept informed." The same sentence/approach is used throughout the document.	E0003-135
E.1.5.2; E.1.5.4; E.2.5.2; E.2.5.3	E.1.5-5 & 6 / E.1.5-10 to 12	4th row in table E.1.5-1, 3	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives.	E0003-136
E.1.6	E.1.6-4, E.1.6-8, E.1.6-12, E.1.6-15, E.1.6-18	6, 1, 3, 3	Text asserts that presence of the R/W and line would permanently impede livestock access to feed, water. This is an assumption without any discussion as to how an impediment occurs. If this merely implies that a different traveled route is taken to access feed and water, there is no impediment created. Likewise, the addition of access roads could actually improve and not impede the circulation for transport of livestock.	E0003-137

Comment Set E0003, cont.
San Diego Gas and Electric Company

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E	E.1.7-2	5	There is little information about the significance of site CA-SDI-6706, unlike the previous and following paragraphs on page E. 1.7-2 regarding other historic resources. The DEIR should add that a portion of the site is currently in open space on the Viejas Indian Reservation, and that the site is presumed eligible for the NRHP/CRHP (Table Ap.9B-83).	E0003-138
E	E.1.7-2	6	On page E.1.7-2 the DEIR mentions that Desert View Tower (CHL 939) is a NRHP/CRHP property located within 0.5 miles of the I-8 Alternative, but omits mention of Mountain Springs Station, also a California Historic Landmark, located within 0.22 miles of the Alternative. The Mountain Springs Station should be discussed in the text.	E0003-139
E.1	E.1.7-6, 10, 12, 16, 19,23 (I-8); E.2.7-6 (BCD); E.3.7-3, 5 (D); E.4.7-3, 6, 8 (Mod D); E.5.7-163, 167 (NIAR)	2, 5, 2, 5, 2, 1 (I-8); 4 (BCD); 3, 5 (D); 4, 4, 3 (Mod D); 2, 3 (NIAR)	The DEIR states that currently no TCPs have been identified that would be directly impacted by the I-8 Alternative; however, a search of the Sacred Lands File noted that lands sacred to Native Americans are present in the vicinity of the alternatives. The DEIR does not define "vicinity", so impacts to TCPs can't be realistically evaluated if there is no definition of the term. Since the alternatives presented in the DEIR covers three Counties in southern California, making a statement that lands sacred to Native Americans are present in the vicinity of the alternatives is inadequate for the evaluation of impacts to TCPs in the I-8 Alternative without a definition of the term "vicinity". A definition of "vicinity" needs to be determined or change the sentence to accurately reflect this I-8 Alternative, not alternatives. This comment also applies to the BCD, D, Modified D, and New In-Area Renewable Alternatives.	E0003-140
E.1; E.7 E.2 E.4	E.1.7-26; E.7-125 E.2.7-8 E.4.7-10	bullet 3 bullet 1 bullet 2	Based on the description provided for metasedimentary rocks (schist, quartzite, marble and amphibolite), these should not be classified as having "marginal" paleontological potential. These are higher grade metamorphic rocks that have been altered to the extent that fossils would be unrecognizable. Even if a remnant of a fossil were identified, it would likely have no scientific value. As a result, any mitigation measures suggested for this unit throughout the remainder of this chapter would be completed unnecessary and ineffective.	E0003-141
E.1	E.1.7-10	4	The Campo North Option is located entirely within the Campo Indian Reservation and permission was not granted for an archaeological record search or for field surveys. Therefore, mitigation measures C-1a and C-1b (Inventory and Evaluate Cultural Resources and Avoid and Protect potentially significant resources) need to be added for this option. Also, since nothing is known about cultural resources in this option, only two (C-3 and C-4) of the six standard impacts (C-1 through C-6) are listed. The other four standard impacts relate to "known" resources. The text should include an acknowledgment that all six standard impacts could apply once the option is surveyed.	E0003-142

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.1	E.1.7-13	2	In paragraph 2 of page E.1.7-13 the DEIR states that indirect visual impacts to Old Hwy 80 are not significant for the West Buckman Springs Option of the I-8 Alternative because of the proximity of Old Hwy 80 to modern features like the I-8. Paragraph 4 of the same page states that for construction of the Project Old Hwy 80 can be mitigated to a level less than significant (Class II); however, on the following page (E.1.7-14) the DEIR states that Old Hwy 80 is potentially subject to long-term and operational impacts. This contradicts the previous statement in paragraph 2 of page E.1.7-13 that states indirect impacts to this resource would be less than significant due to the proximity to modern features. The DEIR needs to clarify how the long-term and operational impacts from the one pad location on the east side of Hwy 80 will occur if it is not visual, which is an impact that the DEIR has determined to be less than significant.	E0003-143
E.1.8; D.8.3.3	E.1.8-9	3	The Draft EIR/EIS identifies that there will be noise and vibration impacts during construction and maintenance activities for which mitigation measures have been identified. It is noted that the San Diego County Code of Regulatory Ordinances prohibits construction noise at a residential property line over 75 dBA weekdays from 7 a.m. to 7 p.m., and the Riverside County Code, which restricts the hours of construction near residences. Two of the construction options being considered by SDG&E are 6 day / 10 hour-per-day or 6 day / 12 hour-per-day work-weeks. Any construction activities on Saturday would need to be low-noise and would substantially limit foundation drilling or helicopter work. This may also result in longer construction duration if work cannot occur on Saturdays.	E0003-144
E.1	E.1.9-10	1	Draft EIS/EIR contemplates future 230 kV circuits could be installed underground in Alpine Boulevard. Installation of the initial double circuit 230 kV line, if feasible, will need to avoid conflicts with existing communication facilities. Thus, future 230 kV circuits within the same road are not feasible.	E0003-145
E.1.10 through E.8.10	Global - all references to Impact P-1 throughout the text	Global, Impact P-1	The wording for Impact P-1 should coincide with that used for Impact P-5 describing the potential for spills associated with operation. Impact P-1, "Soil or groundwater contamination results due to improper handling and/or storage of hazardous materials during construction" is really referring to the potential for accidental spills or releases due to improper handling and/or storage resulting in soil and groundwater contamination. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities." The same text should be used to describe Impact P-1 for all Section E text.	E0003-146
E.1.10 through E.8.10	Impact P-1 in Tables E.1.1.10-1 through E.7.1-23	Global, Impact P-1	The wording for Impact P-1 should be the same as Impact P-1 as used in Table D.10-6. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities."	E0003-147

Comment Set E0003, cont. San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.1.10 through E.8.10	Global - all references to Impact P-3 throughout the text	Global, Impact P-3	The potential risk of exposure to previously unknown contamination is overstated because the most likely types of contamination encountered would be oil, gasoline, diesel, etc. which generally could be detected by visual and olfactory observations. For all discussions of Impact P-3 (Previously unknown soil and/or groundwater contamination could be encountered during grading or excavation), add sentences: "The most likely types of contamination encountered would be oil, gasoline, diesel, etc. These types of contamination generally could be detected by visual and olfactory observations."	E0003-148
E.1.10 through E.8.10	Impact P-1 in Tables E.1.1.10-1 through E.7.1-23	Global, Impact P-1	The wording for Impact P-1 should be the same as Impact P-1 as used in Table D.10-6. Impact P-1 should be changed to "Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and/or storage of hazardous materials during construction activities."	E0003-149
E.1.10 through E.8.10	Global - all references to Impact P-3 throughout the text	Global, Impact P-3	The potential risk of exposure to previously unknown contamination is overstated because the most likely types of contamination encountered would be oil, gasoline, diesel, etc. which generally could be detected by visual and olfactory observations. For all discussions of Impact P-3 (Previously unknown soil and/or groundwater contamination could be encountered during grading or excavation), add sentences: "The most likely types of contamination encountered would be oil, gasoline, diesel, etc. These types of contamination generally could be detected by visual and olfactory observations."	E0003-150
E.1.10	E.1.10-4	3, Impact P-1, second sentence	This section needs to clarify that although spills could result in soil contamination, the most likely incidents would be minor spills that could easily be cleaned up. Replace sentence with: "If a spill occurred that resulted in soil contamination, it would be a significant impact. However, the most likely incidents involving these hazardous materials would be associated with minor spills and drips. Small spills can be easily cleaned up."	E0003-151
E.1.12	4,6,7	4,6,1	The document states, in effect, that the magnitude of the substation grading makes it impossible to mitigate for downstream erosion and sedimentation effects if constructed in the rainy season (October through April). Therefore, Mitigation Measure H-1a states that the substation grading should only occur in the dry season (May through September). The document implies that mitigated construction during the rainy season is either infeasible or prohibited. Currently, there is not believed to be any jurisdictional regulation prohibiting construction of this project during the rainy season. There exist in regulatory documents and guidance appropriate BMP practices to mitigate for erosion and sedimentation of a project of this magnitude during the rainy season. It appears that this mitigation measure is applied subjectively, as the decision to construct during the rainy season, and the resultant BMP regimen used, would almost certainly be an economic decision, rather than a feasibility or regulatory issue.	E0003-152

Comment Set E0003, cont.
San Diego Gas and Electric Company

CH#	Pg#	Par#	Comment	
E.1.4 E.2.4 E.3.4 E.4.4 E.5.4	E.1.4-4 E.2.4- 3, E.3.4- 3, E.3.4-4 E.4.4- 4, E.4.4-6 E.5.4- 112, E.5.4- 116, E.5.4- 116, E.5.4- 118	2, 4 3, 5 4, 6 3, 1, 3, 4	With regard to temporary construction impacts, the following statement is made: "While this disturbance would be short-term and temporary at any one location, impacts would be significant if construction was not carefully managed and residents not kept informed." However, successful construction management and informing the public of construction activities could fully mitigate impacts. Re-phrasing the sentence to read: "while this disturbance would be short-term and temporary at any one location, impacts would not be significant as long as construction was carefully managed and residents kept informed. Repeated 2 pages later.	E0003-153
E.2	E.2.1-1	1	The BCD Alternative proposed in the Draft EIS/EIR goes through Back Country Non-motorized zones. SDG&E proposes a route modification to avoid these non-motorized zones. This re-route would follow the BCD Alternative but continue north at BCD-9 avoiding Back Country Non-motorized Zone before come back south to rejoin the BCD South Alternative.	E0003-154
E.2.2.3	24	1	The EIS/EIR states "The BCD South Option would impact golden eagle (Impact B-7H), QCB (Impact B-7J), and arroyo toad (Impact B-7K). The BCD South Option could impact least Bell's vireo (Impact B-7D), southwestern willow flycatcher (Impact B-7E), and bald eagle (Impact B-7I). The BCD South Option would not impact the following listed or highly sensitive wildlife species: FTHL, PBS, burrowing owl, least Bell's vireo, southwestern willow flycatcher, desert pupfish, desert tortoise, golden eagle, bald eagle, QCB, arroyo toad, Stephens' kangaroo rat, coastal California gnatcatcher, San Diego and/or Riverside fairy shrimp, and barefoot banded gecko. Therefore, Impacts B-7A, B-7B, B-7C, B-7F, B-7G, B-7L, B-7M, and B-7N are not discussed." This paragraph is contradictory because it states that the golden eagle, QCB, and arroyo toad would be impacted and then states that these species would not be impacted. Need to clarify and classify impacts correctly.	E0003-155
E.2.5.2/ E.2.5.3	E.2.5-2 / E.2.5-5	Various	The impact that construction activities would "temporarily reduce access and visitation to recreation or wilderness areas" is treated as Class II impact for these alternatives, but was treated as Class I impact for Proposed Project in Section D.5. Treatment of Proposed Project should be consistent with other alternatives. Inconsistent treatment improperly inflates impacts of Proposed Project and skews ranking of Proposed Project in relation to other alternatives.	E0003-156
E.3.2	3	Table E.3.2-1	The EIR/EIS assumes impacts to vegetation and sensitive plant species cannot be mitigated to a level less than significant. Impacts to most vegetation communities and rare plant species can be mitigated to a level less than significant. Final project design and rare plant survey data to determine significance of project impacts are grossly overstated.	E0003-157