D. Responses to Comments

Introduction

This section presents responses to the comments received during the public review period for the Draft Mitigated Negative Declaration (MND) and supporting Initial Study (MND/Initial Study) (September 21, 2015 through October 20, 2015), as well as the Revised Draft MND/Initial Study (December 4, 2015 through January 4, 2016).

A public meeting was held on Wednesday October 7, 2015 from 6:00 p.m. to 8:00 p.m. at the Sheraton San Diego Hotel & Marina (1380 Harbor Island Drive) in San Diego. Six people attended the meeting, including three members of the public, two representatives from SDG&E, and the engineering contractor (Insignia). Questions regarding the project design and mitigation measures were answered. No written comments were received at the meeting.

Newspaper notices, including information on the Draft MND/Initial Study, the project website address, the review period start and end dates, and the date and time of the public meeting, were published in The Daily Transcript and San Diego Union newspapers on September 21, 2015 (see Appendix 4 for a copy of the notice and proof of publication). A postcard notice was also mailed to property owners of properties located within 300 feet of the proposed alignment.

For the Revised Draft MND/Initial Study, newspaper notices were placed in The Daily Transcript and San Diego Union newspapers on December 4, 2015 (see Appendix 4 for a copy of the notice and proof of publication) to announce the release of the Revised Draft MND/Initial Study, explain why the document was revised, provide the additional review period start and end dates, and inform the public on where the document was available for review. A postcard notice was also mailed to property owners of properties located within 300 feet of the proposed alignment and the alignment option.

The CPUC received four comments letters on the Draft MND/Initial Study and one on the Revised Draft MND/Initial Study. Table D-1 lists the persons and agencies that submitted comments. Each comment letter has been given a letter designation (A through E). The individual comments are numbered; responses immediately follow the comment letter.

Several of the comments received on the Draft MND/Initial Study requested revisions to the document. These revisions were incorporated into the Revised Draft MND/Initial Study. Additional revisions were requested on the Revised Draft MND/Initial Study. These revisions are indicated in the text of this Final MND/Initial Study with ~~strikeout~~ for deletions and <u>underlining</u> for new text.

Table D-1. Comments Received on the Draft and Revised Draft Mitigated Negative Declaration

Commenter	Document	Date of Comment	Comment Set
Terry Fennick Resident	Draft MND/Initial Study	October 19, 2015	A
Jacob Armstrong, Branch Chief California Department of Transportation, District 11, Division of Planning	Draft MND/Initial Study	October 19, 2015	B
Myra Herrmann, Senior Environmental Planner City of San Diego, Planning Department	Draft MND/Initial Study	October 20, 2015	C
Mary Turley, Project Manager San Diego Gas & Electric Company	Draft MND/Initial Study	October 20, 2015	D
Edailia Olivo-Gomez, Senior Environmental Specialist San Diego Gas & Electric Company	Revised Draft MND/Initial Study	December 30, 2015	E

Comment Set A
Terry Fennick, Resident

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments

Vine Substation Project

Date: 10 AUG **Please Print**

Name*: TERRY FENNICK

Affiliation (*if any*):* —

Address:* 2530 COLUMBIA ST

City, State, Zip Code:* SD CA 92103

Telephone Number:* 858 254 6497

Email:* TLFENNICK@COX.NET

(1) I WOULD SUGGEST SINCE W. REDWOOD HAS JUST BEEN REPAVED THAT YOU SHOULD REALIGN PATH SOUTH ON INDIA TO W. OLIVE, BESIDES W. OLIVE NOT AS STEEP.

(2) AT THE MEETING W/CPUC THEY PRESENTED A MAP SHOWING THE COLUMBAST SEGMENT ON THE EAST SIDE BUT ALL THE MARKINGS ARE ON THE WEST. PLEASE CLARIFY THIS FOR ME SO I CAN MAKE ARRANGEMENTS FOR TENANT PARKING.

THANKS, TERRY FENNICK

A-1

A-2

*Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.

Submit comments by mail at the following address. Comments must be postmarked by October 20, 2015.

CPUC Vine Substation Project
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Responses to Comment Set A
Terry Fennick, Resident

A-1 Thank you for your comment regarding the alignment of the 12-kV distribution lines. It is understood that the City recently repaved W. Redwood Street; final stages of construction were observed during a site visit on October 7, 2015. The CPUC consulted with SDG&E regarding the suggested route and confirmed that SDG&E's concern with the suggested route would be worker and public safety during construction, especially because of the freeway exit located at West Olive Street. Construction would take up, at a minimum, the east lane on India Street south of Olive Street to allow room for traffic from Laurel Street to merge onto India Street; however, the space available for merging would need to occur within a very small area of about 30-40 feet due to construction on India Street north of West Olive Street. This would create a potentially hazardous traffic condition. As such, this route was not considered as a viable option for the proposed Project.

SDG&E would repave all streets impacted by construction of the 12-kV lines to the existing condition at the time of construction (e.g., newly replaced in the case of W. Redwood Street).

A-2 The map presented at the public meeting on October 7, 2015, as well as the Project Description Figures (B.1-3d and B.1-3e) show the alignment of the 12-kV distribution line on the east side of Columbia Street. However, as the design of the proposed Project has progressed, SDG&E's engineering consultant has determined that the east side of Columbia contains existing utilities, which would not leave room for the proposed 12-kV duct bank. As such, SDG&E's engineering consultant investigated the west side of Columbia Street and made existing utility mark-outs down the west side to confirm whether that side of the street has space for the 12-kV duct bank. SDG&E's current design recommendation is for the 12-kV duct bank to go down the west side of Columbia Street.

Comment Set B
Jacob Armstrong, Branch Chief
California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN, Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Serious drought.
Help save water!

October 19, 2015

11-SD-5
PM 17.98
SCH 2015091059

Mr. Eric Chiang
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Mr. Chiang:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Vine 69/12 kV Substation Plant located near I-5. Caltrans received a copy of the Draft Mitigated Negative Declaration and Supporting Initial Study Checklist.

Any work performed within Caltrans Right of Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

B-1

Please see Section 600 of the Encroachment Permits Manual for requirements regarding utilities and state R/W: http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/manual/Chapter_6.pdf

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,

JACOB ARMSTRONG, Branch Chief
Development Review Branch

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Responses to Comment Set B
Jacob Armstrong, Branch Chief
California Department of Transportation

B-1 Thank you for your comment regarding work performed within Caltrans Right of Way (R/W) requiring discretionary review and approval by the California Department of Transportation (Caltrans) and an encroachment permit. As noted in IS/MND Section B.1.14, Permits and Approvals, under "Right of Way Requirements," the new and relocated 12-kV distribution circuits and telecommunication lines would be placed entirely within City of San Diego public streets; therefore, construction would not occur within streets under the jurisdiction of Caltrans. As such, no encroachment permits from Caltrans are anticipated. SDG&E will obtain all necessary permits prior to construction.

Comment Set C
Myra Herrmann, Senior Environmental Planner
City of San Diego, Planning Department

THE CITY OF SAN DIEGO

October 20, 2015

California Public Utilities Commission
Attn: Eric Chiang, CPUC Project Manager
505 Van Ness Avenue
San Francisco, CA 94102

Submitted via email to: Vine-Substation-Project@aspeneg.com

Subject: **CITY OF SAN DIEGO COMMENTS ON THE DRAFT IS/MND FOR THE VINE 69/12-KV SUBSTATION PROJECT (SCH# 2015091059)**

The City of San Diego ("City") CEQA has received the Draft Initial Study and Mitigated Negative Declaration (IS/MND) prepared by the California Public Utilities Commission (CPUC) Energy Division and distributed it to multiple City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft IS/MND and appreciates this opportunity to provide comments to the CPUC. In response to this request for public comments, the City has identified potential environmental issues that may result in a significant impact to the environment. Continued coordination between the City, CPUC, and other local, regional, state, and federal agencies will be essential. Following are comments on the Draft IS/MND for your consideration.

The City's Transportation and Storm Water Department has provided comments to the County on the DEIR for this project, as further detailed below.

Transportation & Storm Water Department – Mark Stephens, Associate Planner - mgstephens@sandiego.gov, 858-541-4361

Water quality impairments for San Diego Bay, downstream from the project area, include polychlorinated biphenyls (PCBs), as alluded to on page B.3-111 of the Draft IS/MND prepared by the CPUC. Consequently, it is especially critical to prevent any sediment or other potential water pollution sources from being discharged during project construction, as well as operation and maintenance. C-1

Thank you for the opportunity to provide comments on the IS/MND. Please contact me directly if there are any questions regarding the contents of this letter or if CPUC would like to meet with City staff to discuss our comments. Please feel free to contact me directly via email at mherrmann@sandiego.gov or by phone at 619-446-5372.

Sincerely,

Planning Department
1222 First Avenue, MS 413 – San Diego, CA 92101-4155
Tel (619) 235-5200

Comment Set C, cont.
Myra Herrmann, Senior Environmental Planner
City of San Diego, Planning Department

Page 2 of 2
CPUC
October 20, 2015

Myra Herrmann, Senior Environmental Planner
Planning Department

cc: Reviewing Departments (via email)
Review and Comment online file

Responses to Comment Set C
Myra Herrmann, Senior Environmental Planner
City of San Diego, Planning Department

C-1 Thank you for your comments. Prevention of sediment or other sources of pollution from being discharged during construction is discussed in the IS/MND in Section B.3.9, Hydrology and Water Quality. As stated under question B.3.9(a), SDG&E would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit (Construction General Permit) that would require development and implementation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would specify best management practices (BMPs) that would prevent polluted stormwater (including eroded soil) from leaving the Project site. In addition, SDG&E would implement water quality protection measures, as outlined in SDG&E's Water Quality Construction BMPs Manual, which would further reduce the potential for water quality degradation. SDG&E's Water Quality Construction BMPs Manual is provided as Attachment 4.8-B of the Proponent's Environmental Assessment (PEA) which is available on the CPUC's project website (http://www.cpuc.ca.gov/environment/info/aspen/vine/vine.htm).

Comment Set D
Mary Turley, Project Manager
San Diego Gas & Electric Company

SDGE
A Sempra Energy utility®

Mary Turley
Project Manager, Major Projects

8315 Century Park Court, CP21C
San Diego, CA 92123

Tel: 858-654-1749
mturley@semprautilities.com

October 20, 2015

Eric Chiang, Project Manager

CPUC Vine Substation Project
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Re: DRAFT Mitigated Negative Declaration and Supporting Initial Study Checklist for San Diego Gas & Electric Company's Vine 69/12-kV Substation Project (A.14-05-021)

Dear Mr. Chiang:

Enclosed please find comments from San Diego Gas & Electric Company (SDG&E) on the Draft Mitigated Negative Declaration ("MND") and Supporting Initial Study Checklist prepared by the California Public Utilities Commission ("CPUC") for the proposed Vine 69/12-kV Substation Project (A.14-05-021) (the "Proposed Project" or "Vine Substation").

SDG&E commends the CPUC on its careful analysis of the Vine Substation Project. SDG&E's primary goals in preparing these comments are to assure an accurate and complete record. SDG&E would be happy to provide additional information upon request.

The attached table details the particular minor textual changes that SDG&E proposes be made to the MND for clarity and accuracy. This letter provides further explanation of key issues for the CPUC's consideration. We note that the small changes proposed herein simply clarify, amplify, or make insignificant modifications to the negative declaration. They do not substantially revise the document, identify any new significant environmental impacts, or indicate that new mitigation measures are required to avoid significant environmental impacts. Therefore, MND would not need to be recirculated if the proposed changes were made. California Environmental Quality Act ("CEQA") Guideline section 15173.5.

First, SDG&E appreciates having had the opportunity to discuss the CPUC's proposed mitigation measures. We believe that an iterative process ultimately leads to more effective and efficient mitigation measures. As previously noted, SDG&E will obtain all appropriate ministerial authorizations from local agencies and will provide the CPUC with copies of those authorizations. It is not necessary to also require review and/or approval by the CPUC of such local, ministerial authorizations. The local agencies have the experience and expertise necessary to grant the ministerial permits, which they routinely do for SDG&E and other project proponents. The permit application processes do not anticipate the involvement of a second approval agency. Indeed, it is not clear how the process would unfold if it required review by two agencies. The two agencies could have different or even conflicting requirements that

D-1

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

could be difficult or even impossible to implement. SDG&E respectfully requests that mitigation measures N-1, N-2, and T-1 be slightly modified to clarify that the local agencies will approve the necessary authorizations, and that SDG&E will provide copies of the approvals to the CPUC. The exact textual changes are indicated in the attached table at Comments 3 through 5. These minor refinements would not reduce the effectiveness of the mitigation measures. **D-1, cont.**

Second, it appears that the CPUC has used, with minor refinements, certain project design features and ordinary construction and operating restrictions as mitigation measures. SDG&E does not object to complying with the project design features and ordinary construction and operating restrictions that SDG&E itself proposed. It should be noted, however, that such project design features are part of the project itself. *Wollmer v. City of Berkeley* (2011) 193 Cal.App.4th 1329, 1353. As such, they form the basis for the impact analysis. When such project design features avoid significant impacts, then no mitigation measures are necessary because the California Environmental Quality Act ("CEQA") does not require mitigation of less-than-significant impacts. "Mitigation measures are not required for effects which are not found to be significant." 14 Cal. Code. Regs. (CEQA Guidelines) § 15126.4(a)(3). SDG&E does not believe that certain mitigation measures are necessary, given that the project has been designed to avoid such impacts. However, because SDG&E does not object to complying with the measures themselves, we only propose a few minor textual changes removing references to the project design features in the discussion of the Mitigation Measures AQ-2 and AQ-3. The exact textual changes are indicated in the attached table at Comments 20 and 21. **D-2**

Finally, as a project update that is not directly linked to the MND, SDG&E notes that the San Diego region's Storm Water Standards Manual will be updated at the end of the calendar year. On May 8, 2013, the California Regional Water Quality Control Board, San Diego Region, adopted Order No. R9-2013-0001, National Pollutant Discharge Elimination System ("NPDES") Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region ("2013 MS4 Permit"). The 2013 MS4 Permit required changes to the Storm Water Standards Manual, and those changes become effective as of December 24, 2015. SDG&E expects to receive its grading permit from the City of San Diego prior to this effective date, in which case the regulatory changes would not affect the Proposed Project. If, instead, the grading permit or Proposed Project is delayed, SDG&E will comply with the new requirements. **D-3**

Thank you for the opportunity to comment on the MND and for your efforts to reach this significant milestone. We look forward to continuing to work with you to implement this important project.

Sincerely,

Mary Turley

San Diego Gas & Electric Company
Mary Turley, Project Manager

Encl.

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

VINE 69/12 KILOVOLT SUBSTATION PROJECT
Proposed Comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND)

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
A. Mitigated Negative Declaration						
1.	A-2	Paragraph 3	As described in the Proponent's Environmental Assessment (PEA), the 69 kilovolt (kV) loop-in will involve the removal of two directly buried, dead-end wood poles and the removal of one self-supported stub guy pole. One existing wood distribution pole will also be replaced by a new self-supported tubular steel pole (TSP). The text should be revised accordingly.	Loop in an existing 69-kV power line (TL604) to the proposed Vine Substation, which includes removing two existing wood poles near the corner of California Street and Vine Street and installing three new self-supported tubular steel poles (TSPs) adjacent to the eastern lane of Pacific Highway.	Loop in an existing 69-kV power line (TL604) to the proposed Vine Substation, which includes removing two existing wood poles and one stub guy pole near the corner of California Street and Vine Street, replacing one existing distribution pole with a new self-supported tubular steel pole (TSP), and installing ~~three~~ two new ~~self-supported tubular steel poles (~~TSPs~~)~~ adjacent to the eastern lane of Pacific Highway.	D-4
2.	A-3	Paragraph 3	SDG&E met and conferred with the CPUC regarding mitigation measures. SDG&E and CPUC reached agreement on much of the mitigation and SDG&E has generally agreed to implement the additional recommended mitigations measures. SDG&E nonetheless respectfully requests certain minor adjustments in Mitigation Measures N-1(b), N-2, and T-1, as articulated in this table.	Not Applicable (NA)	NA	D-5
3.	A-6	N-1(b)	SDG&E will obtain all appropriate ministerial authorizations from local agencies, and will provide copies of such authorizations to the CPUC. The text should be revised accordingly, wherever these mitigation measures occur throughout the document.	Prepare a detailed Construction Noise Control Plan (Plan) for review by the CPUC and City of San Diego. The Plan is intended to minimize noise from construction activities to the maximum extent feasible at work areas within 130 feet of residences…	Prepare a detailed Construction Noise Control Plan (Plan) for review by the ~~CPUC and~~ City of San Diego. Official copies of the Plan shall be submitted to the CPUC. The Plan is intended to minimize noise from construction activities to the maximum extent feasible at work areas within 130 feet of residences…	D-6
4.	A-7	N-2		SDG&E shall provide copies of City authorizations to the CPUC for review.	SDG&E shall provide copies of City authorizations to the CPUC ~~for review~~.	D-7
5.	A-7	T-1		Prior to the start of construction, SDG&E shall prepare and submit a Construction Traffic Control Plan for review and/or approval to the CPUC and all agencies with jurisdiction over public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals.	Prior to the start of construction, SDG&E shall prepare and submit a Construction Traffic Control Plan for review and/or approval to ~~the CPUC and~~ all agencies with jurisdiction over public roads and transportation facilities that would be directly affected by the construction activities and/or would require permits and approvals. Official copies of the Construction Traffic Control Plan shall be submitted to the CPUC.	D-8
B.1 Project Description						
6.	B.1-2	Paragraph 2	As previously described in Comment 1, the 69 kV loop-in will involve the removal of two directly buried, dead-end wood poles and the removal of one self-supported stub guy pole. One existing wood distribution pole will also be replaced by a new self-supported TSP. The text should be revised accordingly.	The 69-kV loop in would involve removing two existing poles near the corner of California Street and Vine Street and installing three new poles.	The 69-kV loop in would involve removing two existing poles and one stub guy pole near the corner of California Street and Vine Street, replacing one existing distribution pole with a new self-supported tubular steel pole (TSP), and installing ~~three~~ two new ~~poles~~ TSPs.	D-9
7.	B.1-3	Paragraph 3	SDG&E has consulted with local agencies regarding land use matters, and the text should be revised to note this.	SDG&E has considered local and State land use plans as part of the environmental review process.	SDG&E has consulted with local agencies and considered local and State land use plans as part of the environmental review process.	D-10

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
8.	B.1-3	Paragraph 4	Portions of the 12 kV distribution routes are located within the Uptown Community Plan, as described in the PEA Supplement filed on February 25, 2015. The text should be revised to include this plan.	The Proposed Project is located within the boundaries of the Midway/Pacific Highway Corridor Community Plan and Downtown Community Plan, both of which are also the approved local coastal programs in the area.	The Proposed Project is located within the boundaries of the Midway/Pacific Highway Corridor Community Plan and Downtown Community Plan~~, both of which are also the approved local coastal programs in the area~~. Additionally, portions of the Proposed Project are located within the boundary of the Uptown Community Plan. All three plans are local coastal programs in the area.	D-11
9.	B.1-4	Paragraph 2		The Proposed Project is also subject to the Midway/Pacific Highway Corridor Community Plan and Downtown Community Plan, which identify goals, objectives, and recommendations for the area and establishes a vision for the future form of the community.	The Proposed Project is also subject to the Midway/Pacific Highway Corridor Community Plan, ~~and~~ Downtown Community Plan, and Uptown Community Plan, which identify goals, objectives, and recommendations for the area and establishes a vision for the future form of the community.	D-12
10.	B.1.-5	Paragraph 1	As previously described in Comment 1, the 69 kV loop-in will involve the removal of two directly buried, dead-end wood pole and the removal of one self-supported stub guy pole. One existing wood distribution pole will also be replaced by a new self-supported TSP. The text should be revised accordingly.	Loop in an existing 69-kV power line (TL604) to the proposed Vine Substation, which includes removing two existing wood poles near the corner of California Street and Vine Street and installing three new self-supported tubular steel poles (TSPs) adjacent to the eastern lane of Pacific Highway.	Loop in an existing 69-kV power line (TL604) to the proposed Vine Substation, which includes removing two existing wood poles and one stub guy pole near the corner of California Street and Vine Street, replacing one existing distribution pole with a new self-supported tubular steel pole (TSP), and installing ~~three two~~ new ~~self-supported tubular steel poles (~~TSPs~~)~~ adjacent to the eastern lane of Pacific Highway.	D-13
11.	B.1-11	Paragraph 1	The 12 kV distribution route would cross the Metropolitan Transit System railroad just west of Kettner Substation. The text should be revised accordingly.	The distribution circuits would primarily be located within the franchise position of City of San Diego public streets; no additional ROW would be acquired. The distribution route would cross the MTS railroad at West Palm Street just east of Kettner Substation, which requires a Right-of-Entry Permit (see Section B.1.14, Permits and Approvals). Jack-and-bore construction would occur in this location, therefore it is not anticipated that railroad closure would be necessary (SDG&E, 2015a).	The distribution circuits would primarily be located within the franchise position of City of San Diego public streets; no additional ROW would be acquired. The distribution route would cross the MTS railroad at West Palm Street just ~~east~~ west of Kettner Substation, which requires a Right-of-Entry Permit (see Section B.1.14, Permits and Approvals). Jack-and-bore construction would occur in this location, therefore it is not anticipated that railroad closure would be necessary (SDG&E, 2015a).	D-14
12.	B.1-16	Paragraph 2	As described in the PEA Supplement filed on February 25, 2015, four of the distribution circuits originally proposed within existing conduit within West Laurel Street are now proposed in a combination of existing and new conduit within Vine, India, Sassafras, West Redwood, Columbia, West Laurel, and State Streets. The text should be revised to include these streets as primary access roads for the Proposed Project.	The 12-kV distribution relocation activities would be primarily accessed form Kettner Boulevard.	The 12-kV distribution relocation activities would be primarily accessed form Kettner Boulevard and Vine, India Sassafras, West Redwood, Columbia, West Laurel, and State Streets.	D-15
13.	B.1-19	Table B.1-6	Under the Proposed Vine 69/12-kV Substation, Site Development and Grading portion of the table, it appears that the information for the stringing rig (trailer) equipment has been transposed in the "Hours Operating Site/Day" and "Quantity Required" columns. The table should be revised accordingly.	NA	NA	D-16

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
14.	B.1-20	Table B.1-6	Under 12-kV Distribution Relocation, Jack-and-Bore Installation, it appears that the pump and saw cutting machine equipment were mistakenly listed twice. The table should be revised accordingly.	NA	NA	D-17
15.	B.1-26	Paragraph 6	While Vulcan Materials Landfill and Ennis, Inc. are two potential sources for non-hazardous material recycling, SDG&E requests that the MND be revised to allow for flexibility in selecting a disposal facility in the instance that these sites become unavailable.	In the event that non-hazardous, non-contaminated construction materials, such as concrete or asphalt, are generated, these materials would be recycled at either Vulcan Materials Landfill (10051 Black Mountain Road, San Diego, CA 92126) or at Ennis, Inc. (12535 Vigilante Road, Lakeside, CA 92040) (SDG&E, 2015b).	In the event that non-hazardous, non-contaminated construction materials, such as concrete or asphalt, are generated, these materials would be recycled at either Vulcan Materials Landfill (10051 Black Mountain Road, San Diego, CA 92126), ~~or at~~ Ennis, Inc. (12535 Vigilante Road, Lakeside, CA 92040) (SDG&E, 2015b), or another appropriate local facility.	D-18
16.	B.1-27	Paragraph 2	In response to Energy Division Deficiency Request 01, SDG&E provided Attachment B: Updated Temporary Workspace Requirements Tables, which contains a revised version of Table 2-3: Temporary Workspace Requirements from the PEA Supplement. The text should be revised to indicate that approximately 10,220 linear feet (7.04 acres) of workspace would be required.	A total of approximately 4,320 linear feet (2.98 acres) of workspace would be required to install the duct banks (SDG&E, 2015a).	A total of approximately ~~4,320~~ 10,220 linear feet (~~2.98~~ 7.04 acres) of workspace would be required to install the duct banks (SDG&E, 2015a).	D-19
17.	B.1-32	Paragraph 5-6	The PEA inadvertently identified that approximately 80 cubic yards (CY) of concrete would be delivered to each foundation. Each foundation form would require up to 99 CY of concrete to complete the foundation (assuming two feet of the foundation would be above grade). The text should be revised to account for the anticipated volume of concrete required.	Each foundation hole would measure approximately nine feet in diameter and approximately 40 feet deep, requiring the excavation of 95 CY of soil, depending on the conditions determined during the geotechnical investigations…Each foundation would require approximately 80 CY of concrete to be delivered to the foundation location.	Each foundation hole would measure approximately nine feet in diameter and approximately 40 feet deep, requiring the excavation of approximately 95 CY of soil, depending on the conditions determined during the geotechnical investigations…Each foundation would require approximately ~~80~~ 99 CY of concrete to be delivered to the foundation location.	D-20
B.3.1 Aesthetics						
18.	B.3-3	Paragraph 3	As previously discussed in Comment 8, the Proposed Project is located within the Downtown, Midway/Pacific Highway Corridor, and Uptown communities. The text should be revised to include this plan.	**Regional Context.** The Proposed Project area is within the Downtown and Middletown communities of the City of San Diego.	**Regional Context.** The Proposed Project area is within the Downtown, ~~and~~ Middletown, and Uptown communities of the City of San Diego.	D-21
B.3.3 Air Quality						
19.	B.3-29	Paragraph 2	SDG&E is not aware of any known particulate matter calculation deficiencies in California Emissions Estimator Model. SDG&E requests that these deficiencies be documented and that the CPUC provide the quantitative methodology used to determine that the emissions presented by SDG&E were undercalculated.	The CalEEMod estimated maximum daily PM10 emissions are below the City of San Diego significance thresholds. However, the maximum fugitive dust emissions during substation construction are of concern due to the construction activities being performed and the equipment types (i.e., scrapers) being used, and known deficiencies in the CalEEMod model regarding fugitive dust emissions calculation. To address these concerns, and to account for fugitive dust controls specified by SDG&E as Project design features (see Section B.1.13), fugitive dust control has been proposed during substation construction in Mitigation Measure AQ-3.	NA	D-22

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
20.	B.3-29	Paragraph 1	SDG&E articulated certain project design features and ordinary construction and operating restrictions that are incorporated into the Proposed Project. Because these are integral components of the Proposed Project, they do not need to be incorporated into Mitigation Measures. To the extent that the CPUC decides to impose similar measures as Mitigation Measures, SDG&E requests that the references to the similar project design features and ordinary construction and operating restrictions be deleted from the discussions of Mitigation Measures.	Additionally, to integrate the Project's design features (see Section B.1.13), on-road equipment emissions mitigation has been proposed in Mitigation Measure AQ-2.	~~Additionally, to integrate the Project's design features (see Section B.1.13), o~~On-road equipment emissions mitigation has been proposed in Mitigation Measure AQ-2.	D-23
21.	B.3-29	Paragraph 2		To address these concerns, and to account for fugitive dust controls specified by SDG&E as Project design features (see B.1.13), fugitive dust control has been proposed during substation construction in Mitigation Measure AQ-3.	To address these concerns, ~~and to account for fugitive dust controls specified by SDG&E as Project design features (see B.1.13),~~ fugitive dust control has been proposed during substation construction in Mitigation Measure AQ-3.	D-24
22.	B.3-31	Paragraph 1		The Project design features related to fugitive dust control and off-road and on-road equipment emissions control have been formalized into the following three mitigation measures to reduce NOx emissions throughout Project construction, and the potential for high PM10 and PM2.5 emissions during substation construction.	~~The Project design features related to fugitive dust control and off-road and on-road equipment emissions control have been formalized into the~~ The following three mitigation measures have been formulated to reduce NOx emissions throughout Project construction, and the potential for high PM10 and PM2.5 emissions during substation construction.	D-25
B.3.5 Cultural Resources						
23.	B.3-63	Paragraph 1	The introductory paragraph references the original PEA. Additional information was submitted in the PEA Supplement and the text should be augmented accordingly.	This section describes the cultural resources that occur in the area of the Proposed Project. The following setting information is from the Proponent's Environmental Assessment for the Vine 69/12-kV Substation Project, Volume II, Application 14-05-021 (SDG&E, 2014) and summarizes the prehistoric, ethnohistoric, and historical setting for the Proposed Project area.	This section describes the cultural resources that occur in the area of the Proposed Project. The following setting information is from the Proponent's Environmental Assessment for the Vine 69/12-kV Substation Project, Volume II, Application 14-05-021 (SDG&E, 2014) and summarizes the prehistoric, ethnohistoric, and historical setting for the Proposed Project area. Additional information was submitted in the Proponent's Environmental Assessment Supplement for the Vine 69/12-kV Substation Project (SDG&E, 2015).	D-26
B.3.8 Hazards and Hazardous Materials						
24.	B.3-102	Paragraph 5	As described in the PEA Supplement filed on February 25, 2015, the proposed 12 kV distribution alignment along India Street is located approximately 160 feet west of the Montessori School of San Diego. The text should be revised accordingly.	The new 12-kV duct bank alignment along India Street is located about 300 feet west of the Montessori School of San Diego (1323 West Spruce Street).	The new 12-kV duct bank alignment along India Street is located about ~~300~~ 160 feet west of the Montessori School of San Diego (1323 West Spruce Street).	D-27

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
25.	B.3-103	Paragraph 3	SDG&E agrees with the CPUC that EMF is not an environmental impact to be analyzed under CEQA. CEQA Guideline 15145 requires that when a lead agency thoroughly investigates a particular impact and finds it to be "too speculative for evaluation, the conclusion shall be noted, and the discussion terminated." Here, the CPUC and others have thoroughly investigated the potential impacts of electric and magnetic fields (EMF). A large body of research has been completed, including studies examining patterns and possible causes of diseases in human populations, and studies investigating whether exposure to power-frequency magnetic fields produces biologic effects in laboratory animals and cells and, if so, through what biologic and biophysical mechanisms. Some EMF studies have reported a weak association between estimates of exposure to magnetic fields and certain types of cancer. However, other studies have reported no effects. Laboratory experiments have shown that exposure levels typically well above those normally found in residences can produce changes in cells, but there is little or no evidence that these changes constitute a health risk. This thorough investigation reveals that EMF is too speculative for evaluation, so the discussion of EMF in the mitigated negative declaration should be terminated. The text should be revised accordingly, and should be corrected with regard to the description of EMF.	Electric voltage and electric current from transmission lines create electromagnetic fields (EMF). Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s, and there continues to be public concern about the health effects of EMF exposure. However, EMF is not addressed here as an environmental impact under CEQA. The CPUC has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.	Electric and magnetic fields (EMF) are invisible lines of force that are present wherever electricity flows—around appliances and power lines, and in offices, schools and homes. Electric fields are created by voltage and are shielded by most materials, such as lead, soil and concrete. Both electric and magnetic field strengths diminish with distance. These fields are low energy, extremely low frequency fields. They are not to be confused with high energy or ionizing radiation such as x-rays and gamma rays. ~~Electric voltage and electric current from transmission lines create electromagnetic fields (EMF).~~ Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s. A large body of research has been completed, including studies examining patterns and possible causes of diseases in human populations, and studies investigating whether exposure to power-frequency magnetic fields produces biologic effects in laboratory animals and cells and, if so, through what biologic and biophysical mechanisms. Some EMF studies have reported a weak association between estimates of exposure to magnetic fields and certain types of cancer. However, other studies have reported no effects. Laboratory experiments have shown that exposure levels typically well above those normally found in residences can produce changes in cells, but there is little or no evidence that these changes constitute a health risk. ~~, and t~~There nonetheless continues to be public concern about the health effects of EMF exposure. However, the thorough investigation to date shows that EMF is too speculative for evaluation pursuant to CEQA Guideline 15145 ~~is not addressed here as an environmental impact under CEQA~~. Moreover, ~~T~~the CPUC has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a potential health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.	D-28
26.	B.3-106	Paragraph 2	As described previously in Comment 24, the proposed 12 kV distribution alignment along India Street is located approximately 160 feet west of the Montessori School of San Diego. The text should be revised accordingly.	The new 12-kV duct bank alignment along India Street is located about 300 feet southwest of the Montessori School of San Diego (1323 West Spruce Street).	The new 12-kV duct bank alignment along India Street is located about ~~300~~ 160 feet southwest of the Montessori School of San Diego (1323 West Spruce Street).	D-29

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
B.3.9 Hydrology and Water Quality						
27.	B.3-110	Paragraph 3	The source for this data should be SDG&E, not Southern California Edison. The text should be revised accordingly.	The nearest natural stream to the Proposed Project that is shown on the National Hydrography Dataset is an unnamed, intermittent stream that flows through Olive Park and ends near the intersection of Curlew Street and West Maple Street, close to an existing 12 kV duct bank on the eastern edge of the Project area. A concrete-lined drainage channel is located on the west side of the proposed Vine Substation site (SCE, 2014). This channel does not exhibit characteristics of a natural stream, such as vegetation or accumulated sediment (SCE, 2014).	The nearest natural stream to the Proposed Project that is shown on the National Hydrography Dataset is an unnamed, intermittent stream that flows through Olive Park and ends near the intersection of Curlew Street and West Maple Street, close to an existing 12 kV duct bank on the eastern edge of the Project area. A concrete-lined drainage channel is located on the west side of the proposed Vine Substation site (~~SCE~~ SDG&E, 2014). This channel does not exhibit characteristics of a natural stream, such as vegetation or accumulated sediment (~~SCE~~ SDG&E, 2014).	D-30
B.3.10 Land Use and Planning						
28.	B.3-119	Last Paragraph	The Proposed Project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. The Project is exempt from most local land use plans, policies, and regulations because the CPUC's jurisdiction preempts them. The Project will comply with any remaining plans, policies, and regulations, which would be requirements for ministerial authorizations from local agencies. The impact analysis should be revised accordingly.	LESS THAN SIGNIFICANT. The proposed Vine Substation site is situated on a 1.5-acre parcel owned by SDG&E and is currently being leased for long-term airport parking…	~~LESS THAN SIGNIFICANT.~~ NO IMPACT. The proposed Vine Substation site is situated on a 1.5-acre parcel owned by SDG&E and is currently being leased for long-term airport parking…	D-31
29.	B.3-120	Paragraph 3	SDG&E will obtain all appropriate ministerial authorizations from the City. Because that requires compliance with the applicable Municipal Code provisions, the last sentence is not necessary. The text should be revised for clarity because most local zoning ordinance provisions do not apply to the Proposed Project.	However, the Applicant would still be required to obtain all ministerial building and encroachment permits from the City, and the CPUC will ensure that the Project complies with local regulations to the greatest degree feasible to minimize project conflicts with local conditions. As such, obtaining ministerial building and encroachment permits would inherently require compliance with, or issuance of a variance for deviation from, all applicable local zoning ordinances.	However, the Applicant would still be required to obtain all ministerial building and encroachment permits from the City, and the CPUC will ensure that the Project complies with local regulations to the greatest degree feasible to minimize project conflicts with local conditions. ~~As such, obtaining ministerial building and encroachment permits would inherently require compliance with, or issuance of a variance for deviation from, all applicable local zoning ordinances.~~	D-32
30.	B.3-120	Paragraph 1	As discussed previously in Comment 8, portions of the 12 kV distribution routes are located within the Uptown Community Plan, as described in the PEA Supplement filed on February 25, 2015. Therefore, applicable policies pertaining to land use and planning contained in the Uptown Community Plan should be discussed.	Applicable land use plans, policies, and regulations include: City of San Diego General Plan, Downtown Community Plan, Midway/Pacific Highway Corridor Community Plan, Local Coastal Programs, Port of San Diego Master Plan, San Diego International Airport's ALUCP, and City of San Diego Municipal Code.	Applicable land use plans, policies, and regulations include: City of San Diego General Plan, Downtown Community Plan, Midway/Pacific Highway Corridor Community Plan, Uptown Community Plan, Local Coastal Programs, Port of San Diego Master Plan, San Diego International Airport's ALUCP, and City of San Diego Municipal Code.	D-33
31.	B.3-120	Paragraph 2		The majority of the Proposed Project components are located within the boundaries of the Midway/Pacific Highway Corridor (Midway) Community Plan. The relocation of distribution circuits south of West Laurel Street would occur within the boundaries of the Downtown Community Plan. Both of these community plans are also the approved local coastal programs in this area of the City.	The majority of the Proposed Project components are located within the boundaries of the Midway/Pacific Highway Corridor (Midway) Community Plan. The relocation of distribution circuits south of West Laurel Street would occur within the boundaries of the Downtown Community Plan. In addition, portions of the 12 kV distribution routes east of I-5 are located within the Uptown Community Plan. ~~Both of t~~These community plans are also the approved local coastal programs in this area of the City.	D-34

October 2015
6

San Diego Gas & Electric Company
Vine 69/12 kV Substation Project

Comment Set D, cont.
Mary Turley, Project Manager
San Diego Gas & Electric Company

Proposed Comments on the Mitigated Negative Declaration

Comment Number	MND Page #	MND Paragraph or Table #	Comment	Original IS/MND	Proposed IS/MND Language	
B.3.17 Utilities						
32.	B.3-135	Paragraph 1	As discussed previously in Comment 8, portions of the 12 kV distribution routes are located within the Uptown Community Plan, as described in the PEA Supplement filed February 25, 2015. Therefore, applicable policies pertaining to utilities and service contained in the Uptown Community Plan should be discussed.	NA	NA	D-35
B.3.18 Mandatory Findings of Significance						
33.	B.3-160	Paragraph 2	The PEA Supplement filed on February 25, 2015, contained additional cumulative projects resulting from the relocation of the 12-kV distribution circuits. The text should be revised to indicate that the construction schedule could overlap with the construction schedules for 12 planned and proposed projects and that an additional 15 projects have construction timelines that are unknown.	**Aesthetics.** As discussed in the Proponent's Environmental Assessment (PEA – SDG&E, 2014), the construction schedule for the Proposed Project could overlap with the construction schedules for three planned and proposed projects listed in Table 4.18-1 (Planned and Proposed Projects Within One Mile). An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project.	**Aesthetics.** As discussed in the Proponent's Environmental Assessment (PEA – SDG&E, 2014), the construction schedule for the Proposed Project could overlap with the construction schedules for three planned and proposed projects listed in Table 4.18-1 (Planned and Proposed Projects Within One Mile). An additional ~~seven~~ 12 projects have construction timelines that are unknown and could overlap with the Proposed Project.	D-36
34.	B.3-160	Paragraph 3	The PEA Supplement filed February 25, 2015, contained additional cumulative projects resulting from the relocation of the 12-kV distribution circuits. The text should be revised to indicate that there are 14 projects identified within 0.5 mile of the Proposed Project.	Twelve of the projects identified in PEA Table 4.18-1 (Planned and Proposed Projects Within One Mile) are located within 0.5 mile of the Proposed Project. However, from many locations in the surrounding area, views of the Proposed Project would be partially or fully screened by intervening topography and structures.	~~Twelve~~ Fourteen of the projects identified in PEA Table 4.18-1 (Planned and Proposed Projects Within One Mile) are located within 0.5 mile of the Proposed Project. However, from many locations in the surrounding area, views of the Proposed Project would be partially or fully screened by intervening topography and structures.	D-37

Responses to Comment Set D
Mary Turley, Project Manager
San Diego Gas & Electric Company

D-1 It is understood that SDG&E will submit plans and applications for local and ministerial authorizations to the local agencies for approval and provide copies of plans and authorizations to the CPUC for the administrative record. The requested edits to Mitigation Measures N-1, N-2, and T-1 have been incorporated and do not change the intent or effectiveness of these measures. See response to Comments D-6 through D-8 below.

D-2 Project design features and ordinary construction and operating restrictions are part of the project itself and have been considered as such in the IS/MND. Mitigation measures are required to provide additional specificity and/or to bolster such design features, as well as to provide a mechanism to ensure the impact is adequately reduced below the significance threshold. The textual changes to Mitigation Measures AQ-2 and AQ-3 have been incorporated and do not change the intent or effectiveness of these measures.

D-3 Thank you for the information regarding the update to the San Diego region's Storm Water Standards Manual. All requirements of the NPDES General Construction Storm Water Permit and Project-specific SWPPP shall be imposed. The requirements of the grading permit shall be considered by the City of San Diego at the time of issuance.

D-4 The requested text changes have been incorporated in the Final IS/MND.

D-5 See response to Comment D-1.

D-6 to 12 The requested text changes have been incorporated in the Final IS/MND.

D-13 The requested text changes with minor revisions have been incorporated in the Final IS/MND.

D-14 to 21 The requested text changes have been incorporated in the Final IS/MND.

D-22 Known deficiencies in the CalEEMod fugitive dust calculations include:

1) Being able to clearly match the earthmoving emissions for all phases that move earth and address those emissions. CalEEMod does not allow earthmoving for any phase not noted as a grading phase. While truck trips can be added to address paved road dust, the amount of earth moved (i.e., dust from excavator bucket drops during excavation and refilling holes is only an input for certain construction phases, while for this project many construction phases have earthmoving from excavation). This can be seen in the emissions results for a number of project construction phases, such as, "Vine – Retaining/Boundary Wall Construction", "Daytime Duct Bank and Vault Installation", "Nighttime Duct Bank and Vault Installation", "Pole Installation and Removal", "Jack and Bore Installation", and "Telecom – Duct Bank and Vault Installation" that all have varying levels of excavation/earthmoving and yet all have null results for on-site fugitive dust emissions.

2) CalEEMod does not appear to completely or accurately incorporate the grader, dozer, and scraper use and movement into the emissions calculations; even though the user's guide says that it does on page 26. Scrapers are among the most, if not the most, dust emissions intensive type of construction equipment. Specifically, CalEEMod does not include scraper travel in the unpaved road dust emissions, and scraper travel unpaved road emissions are a very large

fugitive dust emissions source. To use the CalEEMod results from this project as an example, the "unmitigated" maximum daily on-site fugitive dust PM10 emissions during substation construction, which includes 12 hours per day of dozer use and 14 hours per day of scraper use, is just over 9 lbs/day. The USEPA equation for dozers, assuming the factors shown in the CalEEMod run (i.e., 7.9 percent water content and 6.9 percent silt content) would by itself be 9 lbs/day for 12 hours of dozer use; so the review of this CalEEMod run and experience with other projects shows that scraper fugitive dust emissions do not appear to be included at all in the CalEEMod output, and that other factors for earthmoving (excavator drops, etc.) are also likely not included properly. In general, CalEEMod does not handle large construction projects with multiple types of fugitive dust sources completely or well.

3) The CalEEMod user guide (page 40) also notes that "Some fugitive dust mitigation required by some districts do not appear here since the fugitive dust source they mitigate is not quantified by CalEEMod in particular this includes fugitive dust generated by wind over land and storage piles. Since they are not quantified it is not appropriate to apply the reduction." There would be wind erosion emissions during project construction, particularly during the substation's "Vine - Site Development and Grading" phase.

Another potential major deficiency based on default inputs in the CalEEMod model are:

4) Actual soil silt content may be higher than the default values in CalEEMod. Although the site silt content is unknown, the defaults in CalEEMod may be low at 6.9 percent for earthmoving and 8.5 for unpaved roads.

D-23 to 27 The requested text changes have been incorporated in the Final IS/MND.

D-28 Based on SDG&E's comment it appears there is agreement with the CPUC's conclusion that EMF is not an environmental impact to be assessed under CEQA. As suggested by SDG&E, additional clarifying information has been added in the Final IS/MND in order to (1) more completely describe the nature of EMF and (2) provide an overview of the research illustrating the inconclusive nature of EMF research, including reference citations.

D-29 to 34 The requested text changes have been incorporated in the Final IS/MND.

D-35 The applicable policies pertaining to utilities and services contained in the Uptown Community Plan have been added to Section B.3.17.1, as requested.

D-36 to 37 The requested text changes have been incorporated in the Final IS/MND.

Comment Set E
Edalia Olivo-Gomez, Senior Environmental Specialist
San Diego Gas & Electric Company

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December 30, 2015

Eric Chiang, Project Manager
CPUC Vine 69/12-kV Substation Project
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Re: Recirculated Draft Mitigated Negative Declaration and Supporting Initial Study Checklist for San Diego Gas & Electric Company's Vine 69/12-kV Substation Project (A.14-05-021)

Dear Mr. Chiang:

This letter details the comments from San Diego Gas & Electric Company ("SDG&E") on the Recirculated Draft Mitigated Negative Declaration ("MND") and Supporting Initial Study Checklist prepared by the California Public Utilities Commission ("CPUC") for the proposed Vine 69/12-kV Substation Project (A.14-05-021) (the "Proposed Project" or "Vine Substation"). SDG&E's primary goal in preparing this comment letter is to assure an accurate and complete record. Accordingly, SDG&E has reviewed the revised documents and requests the following changes:

1. Revise Figure B.1.4 Land Use Map to include the 12 kV optional reroute segment. A revised version of Figure 3.10-1: Land Use Map from the Proponent's Environmental Assessment Supplement has been attached for your use with this optional segment included. **E-1**

2. SDG&E thanks the CPUC for being responsive to previous comments on the language regarding electromagnetic fields ("EMF"). In order to fully reflect SDG&E's analysis of EMF impacts in the recirculated draft, the following minor textual changes are requested: **E-2**

   Electric and magnetic fields (EMF) are invisible lines of force that are present wherever electricity flows ~~separate phenomena and occur both naturally and as a result of human activity. The fields caused by human activity result from uses such as communications; the generation, transmission, and local distribution of electricity; and from the use of electrical equipment in the work place or electrical appliances in the home.~~ Electric fields are created by ~~an electrical lines~~ voltage and are shielded by most materials ~~magnetic fields by a lines current~~. Magnetic fields are created by current and are not shielded by most materials. EMF strength attenuates (reduces) rapidly as the distance from the source increases. ~~Electric fields are reduced because most objects or materials, such as trees or houses, effectively shield or block the electric fields. Conversely, objects or materials do not easily shield magnetic fields.~~ These fields are low energy, extremely low frequency fields (ELF). They are not to be confused with high energy or ionizing radiation such as x-rays and gamma rays ~~Electric power line EMF carries very little energy and does not have ionizing effects like x-rays or gamma rays~~ that are capable of ~~can~~ disrupting cells.

   Electric voltage and electric current from generation, transmission and distribution power lines and use of electrical equipment in the work place and appliances in homes create electric and magnetic fields. Possible health effects associated with exposure to EMF have been the subject of scientific

1

investigation since the 1970s, and there continues to be public concern about the possible link between exposure to EMF and adverse health conditions ~~effects of EMF exposure~~. Numerous internationally recognized scientific ~~O~~organizations ~~worldwide have~~ convened ~~numerous~~ panels of experts from a variety of disciplines to review the full body of research ~~data~~ relevant to the question of whether exposure to EMF is associated with adverse health effects. These reviews include those prepared by international agencies such as the World Health Organization (WHO), the international Non Ionizing Radiation Committee of the International Radiation Protection Association (IRPA/ICNIRP), as well as governmental agencies of a number of countries (WHO, 1984, 1987, 2001, 2007; ICNIRP, 2003, 2009; HCN, 2004; SSI, 2008).

These major reviews have reported that the body of data, as large as it is, does not demonstrate that exposure to power-frequency magnetic fields causes cancer or other health risks. ~~None of the reviews, that have included a large panel of independent scientists with a broad spectrum of expertise, have arrived at a conclusion as to whether there are known or likely causes of adverse health effects related to low-level electric or magnetic fields.~~

The CPUC recognizes that research has not concluded that an EMF health hazard actually exists~~there is no agreement among scientists that EMF creates a potential health risk~~, and since there are no defined or adopted CEQA standards for defining health risks from EMF, it is not addressed in this document as an environmental impact under CEQA. The CPUC has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because (1) there is no agreement among scientists that EMF does create a health risk, and (2) there are no defined or adopted CEQA standards for defining health risks from EMF.

E-2, cont.

Thank you for the opportunity to comment on the Recirculated Draft MND. SDG&E looks forward to continuing to work with you to implement this important project in early 2016.

Sincerely,

Edalia Olivo-Gomez
Senior Environmental Specialist

cc: Mary Turley, Project Manager, SDG&E
Shivani Ballesteros, Regulatory Case Manager, SDG&E
Rob Curley, Insignia Environmental

Encl.

2

Response to Comment Set E
Edalia Olivo-Gomez, Senior Environmental Specialist
San Diego Gas & Electric Company

E-1 The revised land use map has been incorporated, replacing Figure B.1-4 in the Final IS/MND.

E-2 The requested text changes have been incorporated in the Final IS/MND, with modification.