ERRATA #2

January 6, 2016

In the Matter of the Application of SDG&E for a Master Special Use Permit and Permit to Construct Power Line Replacement Projects (Application No. 12-10-009)

ERRATA

Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS)
Reponses to Comments (Volume 2) for the Power Line Replacement Projects, June 2015

The California Public Utilities Commission (CPUC) and U.S. Forest Service published the EIR/EIS for the Master Special Use Permit and Permit to Construct Power Line Replacement Projects in June 2015. This errata provides clarification of Response to Document No. D4, Backcountry Against Dumps (Donna Tisdale), Dated November 4, 2014 in Volume 2 of the Final EIR/EIS and does not raise new issues about significant effects on the environment. Such clarifications are insignificant as the term is used in Section 15088.5(b) of the California Environmental Quality Act Guidelines, and under the National Environmental Policy Act and do not result in new significant circumstances or information relevant to environmental concerns, nor do they require analysis of a new alternative (40 C.F.R. § 1502.9(c)(1)(ii)).

Comment D4-1 incorporated by reference "the comments that have been submitted currently and previously throughout this MSUP project review by the Boulevard Planning Group, the Protect Our Communities Foundation, Backcountry Against Dumps, Law Offices of Stephen C. Volker, and Donna Tisdale." In their scoping comment letter dated November 7, 2013, Backcountry Against Dumps provided an excerpt from a research paper titled "The Fire Performance of Steel Utility Poles - Literature and Evaluation" written by Stephan T. Smith, P.E. The report written by Mr. Smith concluded that wildfire temperatures may heat the steel of poles to over 500°C, leading to failure by buckling during the fire.

As described in the Final EIR/EIS Section A.4 Purpose and Need (page A-8 to A-10), the purpose of the proposed project is to reduce fire risk associated with SDG&E's existing electric facilities within and around the CNF through fire hardening of existing facilities. In other words the purpose of the project is to reduce the existing fire risk due to line failure, not to build a power line that is fire proof.

The EIR/EIS addresses impacts due to structural failure of poles including from heat due to fires and discloses that the steel poles are more durable, stronger, and less prone to failure than the existing wood poles and that the proposed new steel poles are fire-resistant (as opposed to fire proof).

The EIR/EIS Section D.8.2.2 State Laws and Regulations (pages D.8-25 to D.8-30), describes vegetation clearance requirements, as required in GO 95 and other state regulations. Vegetation clearance as required by state law not only reduces the fire hazards associated with electric overhead lines but also reduces pole exposure to wildfire generated heat and thereby reduces the risk of structural failure.

The Final EIR/EIS Section D.8.3.3 Direct and Indirect Effect, Wildfire Risk Evaluation (pages D.8-45 to D.8.46) describes pole strength requirements outlined in GO 95 (Rules 43 and 48)

including temperature induced loading and how such requirements will minimize pole failure during a wildfire event. The existing wood poles are natural products with inherent variability in the material strength properties. The proposed new steel poles are not susceptible to the same level of deterioration and would be more resistant during wildfire conditions due to construction with fire-resistant material. The EIR/EIS concludes that replacement of existing fire-susceptible wooden poles with 2,104 fire-resistant steel poles will result in a fire-hardened alignment that along with required vegetation clearance would protect proposed project facilities in the event of a wildland fire.

The Final EIR/EIS Section D.8.10 Residual Unavoidable Effects (pages D.8-64 to D.8-65) describes that while SDG&E's proposed project would reduce the existing fire risks associated with the existing overhead electric lines, the proposed project would not eliminate the risk.