

5 COMMENTS AND RESPONSES

5.1 INTRODUCTION

This chapter includes all comments received during the public review period on the Draft IS/MND and the responses to those comments. A total of six comment letters were received in response to the Draft IS/MND for the proposed project.

5.2 COMMENT LETTERS

Comment letters received during the public comment period are listed below in Table 5.2-1. Comment letters are organized by correspondent group and then organized chronologically according to the date they were received. Each comment letter has been assigned a letter and number designation and each comment within that letter has been numbered.

Table 5.2-1 Comments on Draft IS/MND

Comment Letter Designation	Date of Letter	Commenter	Response Numbers
Public Agencies and Tribal Governments			
State			
A1	5/30/17	Maureen El Harake, Caltrans	A1-1
A2	5/30/17	Maurice Eaton, Caltrans	A2-1 through A2-3
Tribal Governments			
A3	5/31/17	Ebru Ozdil, Pechanga Band of Luiseño Indians	A3-1
A4	5/31/17	Vincent Whipple, Rincon Band of Luiseño Indians	A4-1
Local			
A5	5/30/17	Dan Phu, Orange County Transportation Authority	A5-1
Applicant Comments			
B	5/26/17	Elizabeth A. Cason, San Diego Gas & Electric Company	B-1 through B-32

5 COMMENTS AND RESPONSES

5.3 COMMENTS AND RESPONSES

The CPUC considered all comments and is providing responses in this document. The entire text of each comment letter is included in Sections 5.5 and 5.6 below. Comments within each letter are numbered (e.g., A-1, A-2) and responses immediately follow the comments. If text revisions were made to the IS/MND based on the comments, the revisions are provided with the response to the specific comment and are indicated in the text of this Final IS/MND with ~~strikeout~~ for deletions of text and in underline for new text.

5.4 CHANGES TO THE DRAFT IS/MND

The Draft IS/MND was revised in response to comments. Revisions included:

- Editorial changes
- Minor changes to mitigation measures
- Technical clarifications and corrections

The minor modifications and clarifications presented in this Final IS/MND do not contain new significant information as defined in CEQA Guidelines Section 15088.5.

5.5 AGENCY AND TRIBAL GOVERNMENT COMMENTS

This section contains comments received from public agencies and tribal governments and the CPUC's responses to those comments. Responses follow each comment letter.

5 COMMENTS AND RESPONSES

Comment Letter A1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
1750 EAST FOURTH STREET, SUITE 100
SANTA ANA, CA 92705
PHONE (657) 328-6267
FAX (657) 328-6510
TTY 711
www.dot.ca.gov



*Serious Drought.
Making Conservation
a California Way of Life.*

May 30, 2017

Mr. John Forsythe
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

File: IGR/CEQA
SCH#: 2017051003
12-MULTIPLE-2017-00032
I-5

Dear Mr. Forsythe,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration (MND) for the proposed TL 695 and TL 69714 Reconductor Project (SCH # 2017051003). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development.

The project proposes the construction and renovation of Tie-line (TL) 695 and 6971. The project is located in proximity of Caltrans Right-of-Way (ROW) on Interstate 5 (I-5). Caltrans is a responsible agency on this project, and has the following comments on the MND.

Permits:

1. Any project work proposed in the vicinity of the State ROW would require an encroachment permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans's requirements for work done within State ROW, additional documentation would be required before approval of the encroachment permit. Please coordinate with Caltrans to meet requirements for any work within or near State ROW. For specific details for Encroachment Permits procedure, please refer to the Caltrans's Encroachment Permits Manual at:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

A1-1

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

5 COMMENTS AND RESPONSES

Ms. John Forsythe, California Public Utilities Commission
May 22, 2017
Page 2

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Jude Miranda at (657) 328-6229 or Jude.Miranda@dot.ca.gov.

Sincerely,



MAUREEN EL HARAQUE
Branch Chief, Regional-IGR-Transit Planning
District 12

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

5 COMMENTS AND RESPONSES

5.5.1 Response to Letter A1: Maureen El Harake Caltrans District 12

- A1-1 The requirement to coordinate and obtain an encroachment permit from Caltrans for work within or adjacent to State ROW is noted. SDG&E is required to obtain all necessary permits from federal and state agencies. The proposed project is not located within Caltrans ROW; therefore, an encroachment permit is not anticipated. No revisions are required in the IS/MND.

5 COMMENTS AND RESPONSES

Comment Letter A2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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



*Making Conservation
a California Way of Life.*

May 30, 2017

11-SD-5
PM VAR
TL 695 and TL 6971 Reconstructor Project
MND/SCH# 2017051003

Mr. John E. Forsythe, AICP
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Dear Mr. Forsythe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Mitigated Negative Declaration (MND) for the proposed TL 695 and TL 6971 Reconstructor Project located near I-5. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans would like to submit the following comments:

The California Department of Transportation (Caltrans) has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway System. Additional information is provided online at:
<http://www.dot.ca.gov/trafficops/permits/index.html>

A2-1

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at I-5/Basilone Road and I-5/Cristianitos Road at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during the closures, including routes and signage.

A2-2

It is also understood by our agency that no new utility crossings on State Facilities will occur as a result of this project. However, any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an

A2-3

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

5 COMMENTS AND RESPONSES

Mr. John E. Forsythe, AICP
May 30, 2017
Page 2

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 within the Caltrans's R/W, and any corresponding technical studies.

A2-3

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,



MAURICE EATON, Acting Chief
Development Review Branch

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

5 COMMENTS AND RESPONSES

5.5.2 Response to Letter A2: Maurice Eaton, Caltrans District 11

- A2-1 SDG&E will be required to secure necessary permit approvals and comply with all federal and state regulations including Caltrans transportation permits for oversize/overweight vehicles. The special transportation permit has been added to Table MND-2 on page MND-5 and Table 1.3-1 on page 1-4 as follows:

<u>Special Transportation Permit</u>	<u>Caltrans</u>	<u>Movement or operation of vehicle(s) or mobile equipment of a size or weight that exceeds the maximum limitation specified in the California Vehicle Code</u>
--	---------------------------------	---

- A2-2 The proposed project would potentially require lane closures during pole installation adjacent to Basilone Road. Stringing activities would occur for a few minutes across the road and are not expected to require full road closure due to the use of guard structures along the road edge. The nearest location of a potential lane closure is located on Basilone Road within MCB CPEN, and approximately 0.5 mile from the I-5/Basilone Road interchange. The proposed project does not involve installation of any facilities near Cristianitos Road. Guard structures would be used to maintain an open flow of traffic on Cristianitos Road during removal of the existing conductor on TL 695 across Cristianitos Road. The proposed project would not affect traffic at the I-5/Cristianitos interchange because no lane or road closures are proposed on Cristianitos Road. MM Traffic-2 requires SDG&E to create and submit a Traffic Plan Request and Traffic Control Plan to MCB CPEN for approval prior to any traffic diversion, lane closure, road closure, or other work within roadways on MCB CPEN. MM Traffic-2 does not require Caltrans approval of the Traffic Control Plan because the proposed project would not affect traffic flow on any roads or interchanges within Caltrans jurisdiction.
- A2-3 The proposed project does not involve any work or construction within Caltrans ROW; therefore, an encroachment permit is not anticipated. No revisions are required in the IS/MND.

5 COMMENTS AND RESPONSES

Comment Letter A3



PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593
Telephone (951) 770-6300 • Fax (951) 506-9491

May 31, 2017

Chairperson:
Neal Ibanez

Vice Chairperson:
Bridgett Barcello

Committee Members:
Andrew Masiel, Sr.
Darlene Miranda
Evie Gerber
Richard B. Secarce, III
Robert Villalobos

Director:
Gary DuBois

Coordinator:
Paul Macarro

Planning Specialist:
Tuba Ebru Ozdil

VIA E-Mail and USPS

Mr. John E. Forsythe, AICP
c/o Panorama Environmental Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Re: Pechanga Tribe Comments on the Mitigated Negative Declaration (IS/MND) for San Diego Gas & Electric Company's Tie Line 695 and Tie-Line 6971 Reconductor Project

Dear Mr. Forsythe:

This comment letter is submitted by the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government, in response to receipt of the May 1, 2017 Mitigated Negative Declaration (MND) notice of intent for the above named project.

The Tribe is in agreement with the proposed mitigation measures for cultural resources as presented in the document for this Project and request that they be incorporated into the final MND and added as conditions of approval for the Project. The proposed project area is culturally significant and the Tribe appreciates the opportunity to preserve and protect our sensitive cultural resources and to monitor earthmoving activities in the area. The Tribe thanks the California Public Utilities Commission (CPUC) for the revision of the proposed mitigation measures which address the potential impacts to cultural resources, and for the inclusion of the Tribe in those measures.

A3-1

The Pechanga Tribe looks forward to continuing to work together with the CPUC in protecting the invaluable Pechanga cultural resources. Please contact me at 951-770-6313 if you have any questions or comments.

Sincerely,

Ebru Ozdil
Planning Specialist

cc: Pechanga Office of the General Counsel

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

5 COMMENTS AND RESPONSES

5.5.3 Response to Letter A3: Ebru Odzil, Pechanga Cultural Resources

- A3-1 This comment is noted. The CPUC appreciates the Tribe's input on the mitigation measures during the AB 52 consultation process. All project mitigation measures will be incorporated into the Final IS/MND and made conditions of approval should the CPUC approve the project.

5 COMMENTS AND RESPONSES

Comment Letter A4

From: **Vincent Whipple** <vwhipple@rincontribe.org>

Date: Tue, May 30, 2017 at 6:19 PM

Subject: Notice of Intent to Adopt a MND: San Diego Gas & Electric Company's Tie-Line 695 and Tie-Line 6971 Reconductor Project

To: "TL695and6971@panoramaenv.com" <TL695and6971@panoramaenv.com>

Cc: Destiny Colocho <DColocho@rincontribe.org>

RE: Notice of Intent to Adopt a Mitigated Negative Declaration: San Diego Gas & Electric Company's Tie-Line 695 and Tie-Line 6971 Reconductor Project

Mr. John Forsythe:

This message is sent on behalf of the Rincon Band of Luiseno Indians. We have received the Notice of Intent to Adopt a Mitigated Negative Declaration of May 1, 2017 regarding the above named project. Portions of the identified project location are within the Aboriginal Territory of the Luiseno people and they are also situated within Rincon's specific area of cultural interest. Embedded in the Luiseno Territory are Rincon's history, culture, and identity.

As portions of the identified project location are in our Traditional Use Area, Rincon maintains interest in the project. Also, we are in agreement with the MND's stated avoidance and minimization measures at APM CUL-02 as well as the recommended cultural resource mitigation measures MM Cultural-1, MM Cultural-2, MM Cultural-3, MM Cultural-4, MM Cultural-5, and MM Cultural-6. We are especially agreeable to the recommendation for Tribal Cultural Monitoring for the project.

A4-1

Thank you for the opportunity to comment and to protect and preserve our Luiseno cultural heritage.

Vincent Whipple
Cultural Resources / REYS
Rincon Band of Luiseno Indians

5 COMMENTS AND RESPONSES

5.5.4 Response to Letter A4: Vincent Whipple, Rincon Band of Luiseno Indians

A4-1 This comment is noted. The CPUC appreciates your feedback on the APMs and mitigation measures.

5 COMMENTS AND RESPONSES

Comment Letter A5



AFFILIATED AGENCIES

Orange County
Transit District
Local Transportation
Authority
Service Authority for
Freeway Emergencies
Consolidated Transportation
Service Agency
Congestion Management
Agency
Service Authority for
Abandoned Vehicles

May 30, 2017

Mr. John E. Forsythe, AICP
TL 695 and TL 6971 Reconductor Project
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Subject: **San Diego Gas & Electric Company's Tie-Line 695 and Tie-Line 6971 Reconductor Project Draft Initial Study/Mitigated Negative Declaration (IS/MND)**

Dear Mr. Forsythe:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Draft IS/MND for the San Diego Gas & Electric Company's Tie-Line 695 and Tie-Line 6971 Reconductor Project (Project). The following comment is provided for your consideration:

- In Section 3.16 ('Transportation and Traffic'), Figure 3.16-1 displays OCTA routes that have been discontinued since the October 2016 service change (specifically, but not limited to Route 191). Please refer to the following link for the most recent OCTA bus book which contains the OCTA bus system map and route profiles.
 - www.octa.net/busbook/

A5-1

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Phu", written in a cursive style.

Dan Phu
Manager, Environmental Programs

Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)

5 COMMENTS AND RESPONSES

5.5.5 Response to Letter A5: Dan Phu, Orange County Transportation Authority

A5-1 The change to the transit system routing and specifically OCTA route 191 are noted. The CPUC has reviewed the most recent OCTA bus system map and route profiles at www.octa.net/busbook/. Figure 3.16-1 on page 3.16-4 has been revised as shown below to reflect the revised system map.



5 COMMENTS AND RESPONSES

5.6 APPLICANT COMMENTS AND RESPONSES

This section includes the comments received from the Applicant (SDG&E), with individual comments delineated and followed by responses to each comment. SDG&E provided comments in a matrix (Letter B). The matrix provided line-by-line suggested corrections to the Draft IS/MND text, including requests for changes to mitigation measures. The response to comments provides an explanation where changes were not incorporated in the Final IS/MND.

5 COMMENTS AND RESPONSES

Comment Letter B



Elizabeth A. Cason
Senior Counsel
8330 Century Park Court, CP32B
San Diego, CA 92123
Tel: 868-654-1560
ecason@semprautilities.com

May 26, 2017

Reg.12-10/A.16-04-022
SDG&E TL695 and TL 6971 PTC

Sent Via Electronic Mail

John Forsythe, CPUC Project Manager
TL 695 and TL 6971 Reconductor Project
c/o Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Re: Draft Mitigated Negative Declaration for San Diego Gas & Electric Company's TL 695 and TL 6971 Reconductor Project (A.16-04-022)

Dear Mr. Forsythe:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Draft Mitigated Negative Declaration (MND) prepared by the California Public Utilities Commission (CPUC) for the proposed TL 695 and TL 6971 Reconductor Project (Proposed Project) (A.16-04-022). SDG&E commends the CPUC on its careful analysis of the Proposed Project. SDG&E's primary goal in preparing these comments is to ensure an accurate and complete record. SDG&E would be happy to provide additional information upon request. SDG&E's comments and suggested revisions are provided in the attached comment matrix.

Thank you again 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,

A handwritten signature in cursive script that reads "Elizabeth A. Cason".

Elizabeth A. Cason
Senior Counsel
San Diego Gas & Electric

Cc: Susanne Heim, Panorama Environmental, Inc.

5 COMMENTS AND RESPONSES

**San Diego Gas & Electric Company (SDG&E) Review Comments
Draft Initial Study/Mitigated Negative Declaration,
TL 695 and TL 6971 Reconnector Project, Application No. A.16-04-022**

Section	SDG&E Review Comments	
<u>Mitigated Negative Declaration</u>	Table MND-2, page MND-4: for the Federal Endangered Species Act, third column, suggest changing “new” to “proposed,” because the proposed project primarily involves the replacement of existing facilities, rather than the installation of new facilities. The same comment applies the California Endangered Species Act Consistency Determination, third column.	B-1
	MM Hazards-3, page MND-31, Section 3.8, page 3.8-19 and the MMRP page 4-23: for clarity suggest inserting “Within the FUDS site outside of MCB CPEN,” before “SDG&E shall obtain...” since Unexploded Ordnance on MCB CPEN will be disposed of by the Base’s Explosive Ordnance Disposal Detachment. Further, SDG&E believes that Unexploded Ordnance in San Clemente will be disposed of by the Orange County Hazardous Devices Section, rather than by a private contractor.	B-2
	Throughout the MND, the same mitigation measures are listed in three different areas: the resource area text, the Mitigation Measures table, and the MMRP. Please confirm the language is consistent between the three locations, as discrepancies were noted in our review.	B-3
	3.4 Biological Resources: In several paragraphs throughout the discussion of biological resources in Section 3.4, the closing sentence reads as follows: “Compliance with USFWS permit conditions could be used to demonstrate compliance with the CPUC mitigation measures if the permit conditions are equal or more effective in mitigating impacts on special-status species.” The Proposed project is located within the jurisdiction of the USFWS and MCBCP. The qualified and approved biologist will determine what is effective and best for the various construction activities and locations. Please revise the sentence as follows to clarify the responsibilities of the approved biologist: “Compliance with USFWS permit conditions could be used to demonstrate compliance with the CPUC mitigation measures if the permit conditions are equal or more effective in mitigating impacts on special-status species. ”	B-4
	MM Bio - 5, #6: to be consistent add to the end of the sentence “except in the case of an emergency or for safety”.	B-5
	MM Bio - 6, bullet #2: This is federal land where the federal Migratory Bird Treaty Act applies; therefore the active nest definition from the USWFS is the appropriate reference.	B-6
	MM Bio - 6, bullets #4, #7: Please remove CPUC as an approver of the avian biologist since MCBCP and SDG&E will already be approving the biologist based on their qualifications.	B-7
	MM Bio - 6, bullet #6: Monitoring during helicopter use should only occur when necessary and safe. The biologist should not need to monitor helicopter activities outside the breeding season or put themselves in unsafe situations. Please revise bullet #6 as follows: Helicopter use shall be monitored daily <u>as necessary</u> by a qualified biologist(s) from start to finish, during the nesting season.	B-8
	MM Bio – 11: Bullet #1: Because MCBCP will approve the PPM biologist in accordance with USFWS qualifications, please consider removing CPUC as an additional approver of the PPM biologist.	B-9

5 COMMENTS AND RESPONSES

**San Diego Gas & Electric Company (SDG&E) Review Comments
Draft Initial Study/Mitigated Negative Declaration,
TL 695 and TL 6971 Reconductor Project, Application No. A.16-04-022**

Section	SDG&E Review Comments
	<p>Bullet #3 should be revised as follows: “The PPM biologist shall submit a detailed PPM trap and release plan to the USFWS for review and approval prior to any <u>surveys trapping activities</u> in PPM occupied habitat.” There is no anticipated PPM trapping for this project.</p> <p>Bullet #7 should be revised to read as follows: “In the unlikely event that a live PPM is discovered within a work area during construction <u>that could be impacted by construction</u>, the PPM biologist will immediately contact the USFWS for consultation and all work in the area shall halt until consultation is completed.”</p>
	<p>Pages MND-11, 3.4-45, and MMRP page 4-12: MM Bio – 6 state that, “<i>Nest surveys shall occur within 3 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities.</i>” This measure, as written, is not reasonably achievable due to the fluid nature of scheduling construction activities. Requiring that nesting surveys be completed within three days of project-related construction activities would result in an increase in the frequency of surveys and thus an increase in the potential to impact nesting birds because of surveyor intrusions. The increased number of surveys would increase project costs. In addition, it generally takes the majority of avian species up to 5 days to build a nest and to lay eggs. Therefore, a three day survey window is excessive in an effort to meet the goal of reducing impacts to nesting birds to less than significant.</p> <p>SDG&E recommends a five day survey window for nesting surveys to be conducted in place of a three day window. <u>This is consistent with another recent CPUC project (Sycamore-Penasquitos).</u></p>
	<p>Pages MND-15, 3.4-49 and MMRP page 4-14, MM Bio - 8: for the first, second, third and fourth bulleted performance criteria, please consider the following revisions.</p> <p><i>Percent cover and composition shall be similar to the pre-impact native and nonnative conditions of the impact area, a nearby reference site, defined as variation of no more than 10 percent absolute cover from the reference site cover and species composition condition.</i></p> <p><i>Maintenance and monitoring for restoration shall be for 5 years or until success criteria are met. Restoration areas shall be monitored as determined in a restoration plan approved by MCBCP and USFWS, including the appropriate frequency of monitoring visits, eight times in Year 1, six times per year in Years 2 and 3, and four times per year in Years 4 and above.</i></p> <p><i>Restoration areas shall be monitored for invasive plants following installation of the restoration. Invasive plant monitoring shall occur as determined in the restoration plan, including the appropriate frequency of monitoring visits, eight times in Year 1, six times per year in Years 2 and 3, and four times per year in Years 4 and 5. If invasive plants are found during the five-year monitoring period, they shall be removed as necessary to support meeting the cover and species composition success criteria.</i></p> <p><i>If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise</i></p>

B-9

B-10

B-11

5 COMMENTS AND RESPONSES

San Diego Gas & Electric Company (SDG&E) Review Comments Draft Initial Study/Mitigated Negative Declaration, TL 695 and TL 6971 Reconductor Project, Application No. A.16-04-022

Section	SDG&E Review Comments
	<p><i>approved by the USFWS and MCBBCP, CPUC. If the sites meet success criteria early, SDG&E may request early signoff of the restoration by the USFWS and MCBBCP.</i></p>
	<p>Pages MND-19, 3.4-53, MMRP page 4-17: SDG&E has the following comments and recommended revisions to MM Bio – 12:</p> <ul style="list-style-type: none"> • SDG&E’s proposed methodology below will more appropriately categorize weed species within areas where the project could introduce target weed species and species that the project may control as part of habitat restoration requirements in MM Biology-8. • In all areas where SDG&E does not have exclusive access rights other parties have the same probability of introducing nonnative species, SDG&E should not be assumed to be the only possible vector for introduction and spread of nonnative species in these ‘joint use’ areas. • The collection of data within the entire easement will not inform weed control activities for the project and would increase project costs. SDG&E will solely be conducting weed control activities within the project impact areas therefore surveying the entire easement area will not provide data to facilitate control activities. • Preventative weed control treatment is already addressed in the description of the mitigation measure. After that, the priority should be based on the species present and most effective treatment method per species in a given location, rather than mandating the treatment order in the mitigation measure. <p>Recommend revising MM Bio – 12 to state, <i>“To control the potential spread of weed species that may degrade native plant communities on MCBBCP, all equipment and vehicles will be thoroughly power-washed or air compressor-washed before entering MCB CPEN. SDG&E shall also implement the following measures:</i></p> <ul style="list-style-type: none"> • <i>A pre-construction weed inventory shall be conducted by surveying <u>a 10-foot buffer along access roads that are solely utilized by SDG&E and proposed work areas for the project the entire easement and areas immediately adjacent to the project alignment where access permission is obtained, the entire easement and areas immediately adjacent to the project alignment where access permission is obtained,</u> as well as at all ancillary facilities associated with the proposed project where ground disturbing activities are proposed to occur outside of secured facilities (i.e. substations) for weed populations that are (1) considered by MCB CPEN as being a priority for control (i.e., prohibited plants on the Basewide Master Plant List), or (2) weed populations rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (http://www.cal-ipc.org/ip/inventory/index.php) that are not already pervasive (e.g. Bromus spp., Avena spp., Brassica nigra etc.) within and around the project area. Only species on the above mentioned lists that have isolate occurrences and fall within project impact areas will be mapped and targeted for control. Weed populations shall be mapped but not targeted for control outside of proposed project impact areas. These populations shall be mapped and described according to density and area covered. Weed populations within the proposed project impact areas shall be treated prior to construction or at a time when treatments would be most effective based on phenology.</i>

B-11

B-12

5 COMMENTS AND RESPONSES

**San Diego Gas & Electric Company (SDG&E) Review Comments
Draft Initial Study/Mitigated Negative Declaration,
TL 695 and TL 6971 Reconductor Project, Application No. A.16-04-022**

Section	SDG&E Review Comments	
	<ul style="list-style-type: none"> Weed control treatments shall include all legally permitted methods to be used in the following prioritized order: preventative, manual, mechanical, and chemical. All treatments shall be applied with the authorization of MCB CPEN if the treatments occur within MCB CPEN. The application of herbicides shall comply with all state and federal laws and regulations under the prescription of a Pest Control Advisor and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall be within an approved landfill area. The timing of the weed control treatment shall be determined <u>by SDG&E and its contractor(s) for each plant species in consultation with MCB CPEN,</u> with the goal of controlling populations before they start producing seeds. <u>If requested, SDG&E will coordinate with MCB CPEN about control methods prior to initiating treatments.</u> From the time construction begins until two years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. Weed populations shall be treated to not exceed baseline conditions. During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall also be certified weed free.” 	B-12
	<p>MM Cultural – 2, page MND-24, the following revisions should be made to make the language consistent with Section 3.5 and with the MMRP:</p> <ul style="list-style-type: none"> Number 1 the sentence should be revised to, “Construction crews shall be instructed to work within designated <u>approved</u> work areas.” Number 2 should be deleted. <p>Number 4 the sentence should be revised to, “Any design modifications to avoid impacts shall be submitted to the CPUC at least 30-14 days prior to construction.”</p>	B-13
<u>1 Introduction</u>	Section 1-1, page 1-1: please change the filing date from April 22, 2016 to April 25, 2016.	B-14
<u>2 Project Description</u>	Section 2.2, page 2-1: suggest adding a footnote or other text to clarify that the proposed project also includes a 450-foot, 0.09 mile long underground segment, so the reader can confirm that the proposed projects’ total mileage is 10.24. As it currently stands, the 8.41 mile reconductor plus the 1.74 mile power line removal segments add up to 10.15 miles.	B-15
	Figure 2.5-1, page 2-3: replace the SR-1 shield with the I-5 shield within MCB CPEN.	B-16
	Table 2.5-1, page 2-5, remove the “s” from “Junctions” in the text in the second column of the second row of the table.	B-17

5 COMMENTS AND RESPONSES

San Diego Gas & Electric Company (SDG&E) Review Comments Draft Initial Study/Mitigated Negative Declaration, TL 695 and TL 6971 Reconductor Project, Application No. A.16-04-022

Section	SDG&E Review Comments	
	Table 2.6-1, page 2-7: in the second column of the first row, replace “City of San Clemente ROW” with “rights-of-way and easements passing through various public and privately held parcels in San Clemente.”	B-18
	Table 2.6-1, page 2-7: in the second column of the third row, please clarify that the mileage of the underground segment is approximately 0.09 miles so that the combined mileages in the table add to 10.24.	B-19
	Unnamed table, page 2-18: consider adding a table number and name here.	B-20
	Section 2.7.6, page 2-25: for light-duty helicopters, please insert “string conductor and” before “transport construction personnel to remote areas.”	B-21
	Table 2.7-4, pages 2-27: in the second column of the first row, strike the phrase “Donated for reuse or”	B-22
<u>3.1 Aesthetics</u>	Figure 3.1-1, page 3.1-4: the figure implies that the most significant jurisdictions are Orange County and San Diego County, given the size of the font, and MCB CPEN is not labelled, although the City of San Clemente is. Given that the bulk of the proposed project is in MCB CPEN, we recommend that the Base be labelled in this and all other relevant figures in Chapter 3.	B-23
	Section 3.1.4, page 3.1-35: delete “, pointed down” to be consistent with the MM Aesthetics-1 on page MND-6 and the MMRP on page 4-9.	B-24
<u>3.6 Geology and Soils</u>	MM Geology – 1, page 3.6-20: To be consistent with the MMRP language page 4-22, revise the sentence in applicable locations to state, “ <i>Direct-bury poles where topsoil is encountered observed during construction in the top 5 feet of the excavation or where landslides could occur, if appropriate.</i> ”	B-25
<u>3.8 Hazards and Hazardous Materials</u>	Comment #1 – 3.8 Hazards and Hazardous Materials, page 3.8-9. Remove reference of pole donation for reuse.	B-26
<u>3.12 Noise</u>	MM Noise – 3, Under applicable locations, revise sentence to be consistent with MMRP to state, “ <i>Helicopter ILAs and staging yards near sensitive receptors in the City of San Clemente.</i> ”	B-27
<u>3.16 Transportation and Traffic</u>	Section 3.16.1, Level of Service, page 3.16-1: since v/c ratios are not provided in the tables that follow, suggest deleting the sentence describing how v/c is computed.	B-28
	Table 3.16-3, page 3.16-5: please uncheck the “No Impact” box for criterion a).	B-29
	Table 3.16-4, page 3.16-7: the title of the table references substation construction, and the employee trips appear to be inconsistent with employee estimates provided in Table 3-3 of the SDG&E Proponent’s Environmental Assessment. Please correct as appropriate.	B-30
	Criterion c), page 3.16-9, Operation and Maintenance: the proposed project will involve a range of height changes, including both increases and decreases. Suggest that the sentence be rephrased as follows: “The proposed pole structures would in many instances be taller than the existing power poles; however...”	B-31

5 COMMENTS AND RESPONSES

San Diego Gas & Electric Company (SDG&E) Review Comments
Draft Initial Study/Mitigated Negative Declaration,
TL 695 and TL 6971 Reconductor Project, Application No. A.16-04-022

Section	SDG&E Review Comments
<u>3.18</u> <u>Mandatory</u> <u>Findings of</u> <u>Significance</u>	Table 3.18-2, page 3.18-7: in “Location” column for project 10, please insert “Green” in front of “Beach.”

B-32

5 COMMENTS AND RESPONSES

5.6.1 Response to Letter B: San Diego Gas & Electric

B-1 The term “new” facilities has been replaced with “proposed project” facilities for clarification. The text of the MND on page MND-4 has been made as follows:

Impacts on federally listed species during installation of proposed project new facilities

and on page MND-5:

Incidental take of state-listed species during installation of proposed project new facilities where USFWS has issued a Biological Opinion for take of the species

B-2 The CPUC agrees that any unexploded ordnance within MCB CPEN will be disposed of by the Base’s Explosive Ordnance Detachment. The following clarifying revisions have been made to MM Hazards-3 on pages MND-32, 3.8-20, and MMRP 4-24 for unexploded ordnance removal outside of MCB CPEN:

Within the Formerly Used Defense Site (FUDS) outside of MCB CPEN, SDG&E shall obtain a trained contractor for the pre-construction survey ~~and~~; personnel training, ~~and~~ Removal of all unexploded ordnances that are found in the proposed project area will be performed by Orange County Hazardous Devices Section. An unexploded ordnance investigation of known and potential areas used by the military along the easement shall be undertaken by a trained contractor. If unexploded ordnance is found, they shall be removed by the ~~trained contractor~~ Orange County Hazardous Devices Section.

B-3 Comment noted. Several subsequent comments point out specific instances of discrepancies between the mitigation measure text in the MND, resource sections in the IS, and the mitigation monitoring and reporting program (MMRP). Changes to the mitigation measure text in response to SDG&E’s comments are noted below. Other changes to the mitigation measure text for consistency are noted in the Final IS/MND.

B-4 The mitigation measures in this IS/MND include minimum requirements for SDG&E to avoid significant impacts under CEQA. If the permit conditions provided by USFWS are more stringent than the mitigation measures contained in this Final IS/MND then SDG&E shall adhere to those conditions and the implementation of those measures may satisfy the mitigation requirements under CEQA; however, if the conditions in the permits are less stringent than the mitigation measures in this IS/MND and do not provide the same level of protection for special-status species, SDG&E must fully implement the mitigation measures to avoid a significant impact under CEQA. In particular, the permit conditions from USFWS would not provide

5 COMMENTS AND RESPONSES

protections for State of California threatened or endangered species or State of California species of special concern. The CPUC is a state agency and the mitigation measures in this Final IS/MND include protections for State of California special-status species. The biological resource mitigation measures must be fully implemented to mitigate impacts on special-status species in accordance with the MMRP.

- B-5 The following revision has been made to MM Biology-5 on pages MND-10, 3.4-44, and MMRP 4-11 for consistency:

Access to project work areas shall be via preexisting access routes to the greatest extent possible. Project-related vehicle travel shall be limited to daylight hours as arroyo toads use roadways primarily during nighttime hours except in the case of an emergency or for safety.

- B-6 Both the State of California and USFWS definitions of active bird nest apply to the project. The CPUC is the lead agency under CEQA, and both federal and state law must also be considered and adhered to for protection of migratory birds during implementation of the proposed project. A reference to the USFWS definition of active nest has been included in MM Biology-6 on pages MND-11, 3.4-45, and MMRP 4-12:

Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests, which is defined as once birds begin constructing, preparing, or using a nest for egg-laying (as defined in Fish and Game Code Section 681.2b) and any nest containing eggs or nestlings or still essential to the survival of a juvenile bird (USFWS 2003).

Section 3.4.7 is revised on page 3.4-58 as follows:

USFWS. 2003. "Migratory Bird Permit Memorandum." April 15. Accessed June 8, 2017. <https://www.fws.gov/policy/m0208.pdf>.

- B-7 The CPUC typically approves biological monitors on projects where the CPUC is the CEQA lead agency. The approval of biological monitors allows the CPUC to verify that SDG&E has provided appropriate staffing of biological monitors to implement the mitigation measure requirements. The approval process also ensures that the CPUC has an up-to-date list of all environmental monitors that may be used on the project and helps with coordination during mitigation monitoring. No revisions to the IS/MND are required.

- B-8 Monitoring helicopter activities during nesting season is integral to avoiding take of sensitive avian species or those covered under the MBTA. The intent of the measure

5 COMMENTS AND RESPONSES

is to provide monitoring when active nests are located near helicopter use areas. The following revisions have been made to the text of MM Biology-6 on pages MND-14, 3.4-47, and MMRP 4-13 consistent with the measure intent:

Helicopter use shall be monitored daily by a qualified biologist(s) from start to finish during the nesting season unless reduced monitoring is approved by the CPUC prior to helicopter activities and supported by pre-activity survey data.

- B-9 The first part of this comment regards CPUC approval for PPM biologists working on behalf of the Applicant. This comment is similar to Comment B-7 and is addressed by the response to comment B-7. No revisions to the IS/MND are required to address the approval process for PPM biologists.

MM Biology-11 has been revised to clarify when USFWS approval of a trap and release plan would be required; it is noted that SDG&E does not anticipate any trapping as part of the proposed project. The text of MM Biology-11 is revised as follows on pages MND-20, 3.4-52, and MMRP 4 -16:

The PPM biologist shall submit a detailed PPM trap and release plan to the USFWS for review and approval prior to any surveys-trapping activities in PPM-occupied habitat.

To avoid all potential impacts to PPM that could occur during construction, including any impacts that could occur outside of work areas, MM Biology-11 has been revised as follows on pages MND-20, 3.4-52, and MMRP 4-17:

In the unlikely event that a live PPM is discovered within a work area during construction that could be impacted by construction, the PPM biologist will immediately contact the USFWS for consultation and all work in the area shall halt until consultation is completed.

- B-10 The three-day survey window included in MM Biology-6 was specifically requested by CDFW's biologist because birds can construct nests in less than five days and a five-day survey window would not provide adequate protection for special-status and migratory birds. In addition, MCB CPEN typically uses a three-day survey window for projects occurring within the Base. No revision to the survey window in MM Biology-6 is required because the three-day survey window is protective of avian species and is consistent with MCB CPEN survey procedures.
- B-11 The success criteria defined in MM Biology-8 for restoration of temporary impact areas are necessary to ensure that a significant impact does not occur. SDG&E's requested revisions regarding removal of success criteria are rejected because the changes would defer the mitigation and result in potentially significant impacts. The

5 COMMENTS AND RESPONSES

intention of the measure is to ensure that areas of temporary impacts are properly restored and do not result in permanent habitat impacts.

The following revision has been made to the mitigation measure on pages MND-17, 3.4-49, and MMRP 4-14 to clarify that restoration maintenance and monitoring activities may cease once final success criteria have been met:

If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the CPUC. If the sites meet success criteria early, SDG&E may request early signoff of the restoration by the USFWS, MCB CPEN, and CPUC.

B-12 SDG&E's request to modify MM Biology-12 to better reflect the impacts of the project and not the impact of other parties that may be working in the area is noted. The intention of the measure is to mitigate the introduction and spread of invasive weeds that would be caused by the proposed project. The proposed revisions to the text have been incorporated where they would grant more specificity to the measure by defining the areas for which SDG&E is responsible for weed management, priority weed species to manage, and the process to coordinate with MCB CPEN on weed control. The following revisions have been made to MM Biology-12 on pages MND-21, 3.4-53, and MMRP 4-17:

- A pre-construction weed inventory shall be conducted by surveying ~~the entire easement and areas immediately adjacent to the project alignment where access permission is obtained~~ a 10-foot buffer along access roads that are solely utilized by SDG&E and proposed work areas for the project, as well as at all ancillary facilities associated with the proposed project where ground-disturbing activities are proposed to occur outside of secured facilities (i.e., substations) for weed populations that are (1) considered by MCB CPEN as being a priority for control (i.e., prohibited plants on the Basewide Master Plant List), or (2) weed populations rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (<http://www.cal-ipc.org/ip/inventory/index.php>) that are not already pervasive (e.g. *Bromus spp.*, *Avena spp.*, *Brassica nigra*, and etc.) within and around the project area. Only species on the above-mentioned lists that have isolated occurrences and fall within project impact areas will be mapped and targeted for control. Weed populations shall be mapped but not targeted for control outside of proposed project impact areas. These populations shall be mapped and described according to density and area covered. Weed populations within the proposed project

5 COMMENTS AND RESPONSES

impact areas shall be treated prior to construction or at a time when treatments would be most effective based on phenology.

- Weed control treatments shall include all legally permitted methods ~~to be used in the following prioritized order: preventative, manual, mechanical, and chemical~~. All treatments shall be applied with the authorization of MCB CPEN if the treatments occur within MCB CPEN. The application of herbicides shall comply with all state and federal laws and regulations under the prescription of a Pest Control Advisor and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris shall be within an approved landfill area. The timing of the weed control treatment shall be determined by SDG&E and its contractor(s) for each plant species in consultation with MCB CPEN, with the goal of controlling populations before they start producing seeds. SDG&E shall coordinate with MCB CPEN regarding control methods prior to initial treatments and prior to any significant change in treatment method (e.g., change in type of herbicide[s] that will be applied).

B-13 As mentioned in response to comment B-3, inconsistent mitigation measure language was inadvertently included in the MND. MM Cultural-2 was revised on pages MND-25 to MND-26 for accuracy and consistency with the MMRP to include the intended mitigation measure text.

B-14 The application filing date was incorrect in the Introduction section of the Draft IS/MND. The date has been corrected on page 1-1 and now reads:

The application was filed on April ~~22~~25, 2016

B-15 The proposed underground portion of TL 695 is approximately 450 feet long, which is approximately 0.09 mile. The units of feet instead of miles were used for the underground power line because of the very short segment of line. To avoid any confusion over the total mileage of the proposed project, the text on page 2-1 is revised as follows:

The proposed project would involve reconductoring approximately 8.41 miles of 69-kilovolt (kV) power line conductor on TL 695 and TL 6971, replacing existing wood pole structures with new steel pole structures, and installing ~~a~~ an approximately 0.09 mile new underground 69-kV power line.

5 COMMENTS AND RESPONSES

- B-16 State Route 1 merges with Interstate 5 through MCB CPEN. In order to avoid confusion, the SR-1 shield has replaced the I-5 shield on Figure 2.5-1 as shown below and on page 2-3 of the IS/MND.



- B-17 The San Mateo Junction is a single point and not several junctions. The following revision has been made to correct a typo on page 2-5:

From San Mateo Junctions, runs in a southwest orientation towards San Mateo Substation; TL 695 does not enter San Mateo Substation

5 COMMENTS AND RESPONSES

B-18 The proposed project will have activities and facilities located within the limits of the City of San Clemente. The text of page 2-7 has been revised to clarify the property ownership for ROW and easements within the limits of the City of San Clemente:

Segment A would be approximately 3.33 miles long, extending from Talega Substation to San Mateo Junction as shown on Figure 2.6-1. Segment A would be located entirely within existing easement granted by the DoN, and ~~City of San Clemente ROW rights of way and easements passing through various public and privately held parcels in the City of San Clemente.~~

B-19 See response to Comment B-15. The following revision has been made to page 2-7 for clarification and consistency:

The underground portion of the proposed project, Segment C, would be approximately 450 feet ~~(0.09 mile)~~ long and located on the eastern side of SONGS Mesa. Segment C would be located within an existing SCE utility corridor that runs along the eastern side of SONGS Mesa. SDG&E would obtain a new easement from the DoN prior to construction of the underground power line.

B-20 Table 2.7-1 extends across two pages. The table referenced in this comment is the continuation of Table 2.7-1, which begins on page 2-17; the title is listed at the top of the table. No revisions to the IS/MND are necessary.

B-21 This comment clarifies the uses of light-duty helicopters during project activities. In order to accurately represent the scope of activities conducted with medium- and heavy-duty helicopters, the following revisions have been made to page 2-25:

Medium- and heavy-duty helicopters would be used for pole installation activities, and light-duty helicopters would be used to ~~string conductor and~~ transport construction personnel to remote work areas.

B-22 The Project Description in the Draft IS/MND included an option of donating the wood poles removed as part of the proposed project for reuse. Based on this comment SDG&E will not donate the wood poles for reuse. The following revisions have been made to page 2-26 to reflect the disposal of wood poles:

SDG&E would attempt to reuse, ~~or~~ recycle, ~~or donate~~ all old structures, poles, materials, and components not needed for the proposed project. Materials that could not be reused, ~~or~~ recycled, ~~or donated~~ would be disposed of at an appropriate facility.

and:

~~Donated for reuse or d~~Disposed of at Otay Landfill

5 COMMENTS AND RESPONSES

B-23 A majority of the proposed project activities will occur on MCB CPEN as described throughout the IS/MND. In order to provide additional context and clarification, several figures in Chapter 3 were revised to include labeling of MCB CPEN. Please see the list of revised figures below.

Figure	Section (Page Number)
2.5-1 Regional Project Location	2.5 (2-3)
2.6-1 Proposed Project Components (Map 1 of 2)	2.6 (2-6)
2.6-2 Proposed Project Components (Map 2 of 2)	2.6 (2-7)
3.1-1 Landscape Character Units in the Proposed Project Area	3.1 (3.1-4)
3.1-2 Key Observation Points	3.1 (3.1-12)
3.2-1 Designated Farmland in the Proposed Project Area	3.2 (3.2-5)
3.3-1 Sensitive Receptors in the Proposed Project Area (Map 1 of 2)	3.3 (3.3-9)
3.3-2 Sensitive Receptors in the Proposed Project Area (Map 2 of 2)	3.3 (3.3-10)
3.4-1 Vegetation Communities in the Project Study Area (Map 1 of 2)	3.4 (3.4-8)
3.4-2 Vegetation Communities in the Project Study Area (Map 2 of 2)	3.4 (3.4-9)
3.4-3 Coastal Zone and Critical Habitats in the Proposed Project Area	3.4 (3.4-18)
3.5-1 Paleontological Sensitivity of the Proposed Project Area	3.5 (3.5-12)
3.6-1 Geologic Units in the Proposed Project Area	3.6 (3.6-2)
3.8-1 Hazardous Sites in the Proposed Project Vicinity	3.8 (3.8-2)
3.8-2 Regional Airports and Helipads	3.8 (3.8-5)
3.8-3 Fire Hazard Zones	3.8 (3.8-7)
3.9-1 Watersheds and Surface Waters in the Proposed Project Area	3.9 (3.9-2)
3.9-3 FEMA Flood Zones in the Proposed Project Area (Map 1 of 2)	3.9 (3.9-6)
3.9-4 FEMA Flood Zones in the Proposed Project Area (Map 2 of 2)	3.9(3.9-7)
3.10-1 Land Uses in the Proposed Project Area	3.10 (3.10-3)
3.12-1 Noise Sensitive Receptors in the Proposed Project Area (Map 1 of 2)	3.12 (3.12-6)
3.12-2 Noise Sensitive Receptors in the Proposed Project Area (Map 2 of 2)	3.12 (3.12-7)
3.14-1 Location of Fire Stations, Police Stations, Schools, and Parks in the Proposed Project Area	3.14 (3.14-2)
3.15-1 Public Recreational Facilities near the Proposed Project (Map 1 of 2)	3.15 (3.15-3)
3.15-2 Public Recreational Facilities near the Proposed Project (Map 2 of 2)	3.15 (3.15-4)
3.16-1 Bikeways and Public Transportation in the Proposed Project Area	3.16 (3.16-4)

5 COMMENTS AND RESPONSES

- B-24 See response to comment B-3 regarding inconsistencies between the MND, resource section, and the MMRP mitigation measure language. The following revision was made to the text of MM Aesthetics-1 on page 3.1-35 to correct an error in the Draft IS/MND and ensure consistency with the text of MM Aesthetics-1 in the MMRP and MND:
- All nighttime lighting shall be shielded, ~~pointed down~~, and directed away from surrounding properties. Lights will not be left on at night, except as required for nighttime work and/or an emergency.
- B-25 See response to comment B-3 regarding inconsistencies between the MND, resource sections, and MMRP mitigation measure language. The following revision was made to the text of MM Geology-1 on page 3.6-20 to correct an error in the Draft IS/MND and ensure consistency with the MMRP and MND:
- Direct-bury poles where topsoil is ~~encountered~~ observed during construction in the top 5 feet of the excavation ~~or where landslides could occur, if appropriate.~~
- B-26 See response to Comment B-22. The following revision was made to the text on page 3.8-9 to reflect disposal of wood poles:
- As discussed in Section 2: Project Description, existing wood poles would be ~~donated for reuse or~~ disposed of at Otay Landfill, which is a RWQCB-approved treated wood waste landfill (DTSC 2013).
- B-27 See response to comment B-3 regarding inconsistencies between the MND, resource sections, and MMRP mitigation measure language. The following revision was made to correct an error in the text of MM Noise-3 on page 3.12-18:
- Helicopter ILAs and staging yards near sensitive receptors in the City of San Clemente.
- B-28 The discussion of v/c ratios is included on page 3.16-1 in order to describe the process by which LOS was calculated. The relationship between the v/c ratio and LOS is needed to provide sufficient background on the method used to calculate LOS. No revisions were made to the IS/MND.
- B-29 The impact analysis on page 3.16-6 correctly identifies the significance of the impact as less than significant. The “no impact” box in Table 3.16-3 was accidentally checked during document production. Impact a) in Table 3.16-3 has been updated to show only a check mark in the “Less than Significant Impact” box, consistent with the impact analysis.

5 COMMENTS AND RESPONSES

B-30 SDG&E filed the Proponent’s Environmental Assessment including the initial trip estimates in Table 3-3 with the CPUC on April 25, 2016. SDG&E provided revised air quality modeling and the inputs to the air quality model, including vehicle trips, on December 21, 2016 (see response to Data Needs #2, AD-4. The air quality input data also contained dates for construction phasing, which showed overlap between the stringing and direct pole burying construction phases. The CPUC assumed stringing and direct pole bury vehicle trips could occur simultaneously due to the overlap in construction schedule for the two construction phases. The trip estimates in Table 3.16-4 were calculated consistent with the air quality model assumptions. The title of the second column in the table has been revised to correctly reflect the overlap of stringing activities with direct bury activities rather than pier foundation activities. The title and text of Table 3.16-4 on page 3.16-7 have been corrected as follows:

Table 3.16-4 Maximum Trips Generated During Proposed Project Substation Construction

Trip Source	Maximum Trips Per Day	Maximum Peak Hour Trips
Trenching, Stringing, and Cleanup		
Employee Vehicles ^a	54	27
Vendor Deliveries	10	4
Haul Trips	363	151
Maximum Total Trips	427	182
Direct Bury and <u>Stringing Pier Foundation</u>		
Employee Vehicles	84	42
Vendor Deliveries	30	13
Haul Trips	0	0
Maximum Total Trips	114	55

Notes:

^a Employee vehicles include pickup trucks and crew trucks.

^b This analysis assumes that haul trips and vendor deliveries would be evenly distributed from 7:00 am to 7:00 pm, and half of worker trips could occur during pm peak hours.

B-31 The change in pole height will vary by pole and type. Some poles may be taller and some shorter, as noted by SDG&E in the comment. The text of page 3.16-9 has been revised as follows:

The proposed pole structures would ~~be approximately 20 feet in~~ many instances be taller than the existing power poles; however, the new pole structures would be installed in existing transmission corridors and would be shorter than adjacent existing transmission towers.

5 COMMENTS AND RESPONSES

B-32 This comment addressed a lack of clarity regarding which beach was being referenced in Table 3.18-2 for project 10. The following change has been made on page 3.18-7 for clarification:

Green Beach, Sierra Training Area, and adjacent areas

5 COMMENTS AND RESPONSES

This page is intentionally left blank.