

PUBLIC SCOPING REPORT

**San Diego Gas and Electric Company
Otay Mesa Power Purchase Agreement
Transmission Project
CPCN Application No. 04-03-008**

LEAD AGENCY:

CALIFORNIA PUBLIC UTILITIES COMMISSION

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1.0 OVERVIEW OF CEQA SCOPING PROCESS

1.1 Introduction

On March 8, 2004, San Diego Gas and Electric (SDG&E) filed an application (A.04-03-008) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the Otay Mesa Power Purchase Agreement (OMPPA) Transmission Project. The proposed project includes a new 230 kilovolt (kV) electric transmission circuit that would connect the Otay Mesa Power Plant with both the existing Sycamore Canyon and Old Town substations. The CPUC has determined that an Environmental Impact Report (EIR) is required under the California Environmental Quality Act (CEQA). The EIR will evaluate the proposed project and alternatives to the proposed project, including the No Project Alternative. The primary components to be evaluated in the EIR include a new 230kV electric transmission circuit, a new transition station and modifications to the existing Sycamore Canyon, Miguel and Old Town substations. The new 230kV transmission circuit to be evaluated in the EIR includes approximately 21 miles of overhead transmission lines to be located within existing SDG&E right-of-way and seven miles of transmission lines to be located underground primarily within City of San Diego roadways. The transmission line to be evaluated in the EIR would cross the cities of San Diego, Chula Vista, National City, and unincorporated areas in the eastern portion of San Diego County, as well as military lands.

The Scoping Report documents the CPUC's CEQA scoping process and the comments received for the OMPPA Transmission Project EIR. Specifically, the Scoping Report describes the scoping activities, and documents the written and oral comments received on the OMPPA Transmission Project Notice of Preparation (NOP), and at the CPUC's CEQA Scoping Meetings. The Scoping Report serves as an information source to the CPUC in its determination of the range of issues and alternatives to be addressed in the OMPPA Transmission Project EIR.

1.2 Summary of CEQA Scoping Process

The CEQA scoping process provides government agencies, public and private organizations and the general public the opportunity to identify environmental issues and alternatives for consideration in the EIR. The scoping process and results are an initial step in the CEQA process. The OMPPA scoping process was initiated with the publication of the NOP on July 23, 2004. The NOP is contained in APPENDIX A-1 of the Scoping Report. The NOP was sent to 113 federal, state, and local agencies and planning groups, and was distributed to 23 private organizations, 18 Native American groups, and 7 local libraries. Concurrent with the distribution of the NOP, over 3,000 Public Notices regarding the project and CEQA scoping process were distributed to concerned citizens and property owners within 300 feet of the project right-of-way.

The comment period for the NOP ended on August 23, 2004. In total, 22 letters and written comments, and 13 oral comments were received. These comments are incorporated into the EIR project record, and are documented and summarized in this Scoping Report.

During the NOP comment period, the CPUC held three public scoping meetings :

- August 3, 2004, Balboa Park Club 7:00 to 9:00 p.m., 2125 Park Blvd. San Diego, California
- August 4, 2004, Chula Vista City Council Building, 2:00 to 4:00 p.m. and 7:00 to 9:00 p.m., 276 Fourth Avenue, Chula Vista, California

The scoping meetings provided the public and government agencies the opportunity to receive information on the CEQA process and SDG&E's proposed project and to provide oral and written comments. Approximately 40 persons attended the scoping meetings, including representatives from 2 local agencies, 18 organizations and 11 private citizens.

Materials provided to the public at the CEQA scoping meetings are contained in APPENDIX A and include the following:

- Appendix A-1 – Notice of Preparation
- Appendix A-2 – Public Notice
- Appendix A-3 – Scoping Material Handouts, including the Scoping Meeting Agendas, Power Point Presentation, and Scoping Comment forms.

In addition to the 30-day NOP scoping process, the CPUC and consultant team will conduct following agency consultations with the City of Chula Vista, San Diego Unified Port District, and Centre City Development Corporation on September 30, 2004.

1.3 Agency Notification

The NOP was distributed to responsible agencies under CEQA and federal, state, and local agencies that may be affected by, or have an interest in, the Proposed Project. The NOP was sent to 15 federal agencies, 24 state agencies, and 74 local agencies and planning groups. The NOP was also distributed to 23 private organizations, 18 Native American groups, and 7 local libraries. The NOP Distribution List is contained in APPENDIX A-4.

1.4 Public Notification

Public notification for the OMPPA Transmission Project and scoping meetings entailed newspaper announcements and the mailing of the NOP and Public Notices. Notice for the public scoping meetings was published in the San Diego Union Tribune and the Star News on July 23, 2004. Concurrent with the distribution of the NOP, Public Notices regarding the project and CEQA scoping process were distributed to over 3,000 concerned citizens and property owners within 300 feet of the project right-of-way. APPENDIX A-2 contains the Public Notice and APPENDICES A-4 and A-5 contain the associated mailing lists. SDG&E was responsible for preparing the notification list of property owners within 300 feet of their proposed facilities.

The NOP was also made available to the public on the CPUC's environmental website for the OMPPA Transmission Project at: <http://www.dudek.com/cpuc/sdge-omppa-trans-proj/>.

1.5 Agencies, Organizations and Persons Providing Scoping Comments

Written and oral comments were received during the CEQA scoping process from federal, state and local agencies, private and public organizations, and the general public. Oral and written comments provided at the scoping meetings are summarized in APPENDIX B of the Scoping Report. Written comments provided in response to the NOP are contained in APPENDIX C.

In summary, the following agencies, organizations and private citizens provided input during the CEQA scoping process:

Federal Agencies

Bureau of Indian Affairs, July 29, 2004

U.S. Fish and Wildlife Service, June 15, 2004 (pre-scoping period e-mail. USFWS stated that this e-mail served as their scoping period comments.)

State Agencies

California Department of Toxic Substances, August 23, 2004

California Department of Transportation, District 11, August 23, 2004

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, July 26, 2004

Native American Heritage Commission, July 30, 2004

Local Agencies and Planning Groups

City of Chula Vista, August 4, and 23, 2004
City of San Diego, Development Services Department, August 18, 2004
City of San Diego, Land Development Review Division, August 20, 2004
Centre City Development Corporation, August 3 and 19, 2004
County of San Diego, Department of Planning and Land Use, August 23, 2004
San Diego County Water Authority, Right of Way Department, August 5, 2004
San Diego Unified Port District, Land Use Department, August 23, 2004
Sweetwater Authority, August 19, 2004

Public and Private Organizations

Calpine Corporation, August 23, 2004
Crossroads II, August 25, 2004
Downtown San Diego Partnership, August 3, 2004
Duke Energy North America, August 23, 2004
Environmental Health Coalition, August 4, and 23, 2004
Green Party of San Diego, August 4, 2004
San Diego Convention Center Corporation, August 10, 2004
San Diego County Hispanic Chamber of Commerce, August 4, 2004
San Diego County Archaeological Society, August 29, 2004
San Diego Gas and Electric, August 23, 2004
Sierra Club, August 3 and 4, 2004
Southbay Green, August 4, 2004
American Design, Inc., August 4, 2004

Private Citizens

Acerro, Theresa, August 4, 2004
Hafner, Janet, August 3, 2004
Levinsky, Frieda, July 23, 2004
Richter, Amy, August 4, 2004
Trautmann, Bill, August 4, 2004

The input received during the CEQA scoping process will assist the CPUC in identifying the environmental issues and range of alternatives to be addressed in the EIR. All issues raised in the scoping process will be reviewed by the CPUC to determine the appropriate level of analysis and consideration.

1.6 Organization of Scoping Report

Summary information on SDG&E's stated project objectives and the OMPPA Transmission Project description is presented in *Section 2.0* and provides background information regarding the applicant's proposed project. The results of the EIR Scoping Process are subsequently summarized in *Section 3.0*. APPENDIX A includes notification and scoping meeting materials, APPENDIX B provides a summary of oral scoping comments, and APPENDIX C provides letters received in response to the NOP.

2.0 SUMMARY OF SDG&E'S PROPOSED PROJECT

2.1 Summary of SDG&E's Proposed OMPPA Transmission Project Facilities

As proposed by SDG&E, the OMPPA Transmission Project primarily consists of a new 230 kilovolt (kV) electric transmission circuit, a new transition station and modifications to SDG&E's existing Sycamore Canyon, Miguel, and Old Town Substations. The new 230kV electric transmission circuit is proposed from SDG&E's Sycamore Canyon Substation to SDG&E's Miguel Substation, and from the Miguel Substation to SDG&E's Old Town Substation. The OMPPA Transmission Project proposes to install the new 230kV electric transmission circuit with overhead and underground segments. The overhead portion of the transmission line includes approximately 45 miles proposed to be located within existing SDG&E right-of-way (ROW) that would cross the cities of Santee, Chula Vista, National City, San Diego, unincorporated areas of eastern San Diego County, and military lands. The underground portion of the line includes approximately seven miles, proposed to be installed in a new underground duct bank, primarily within City of San Diego roadways. Transmission facilities include the following five segments and related substation modifications:

Sycamore Canyon Substation to the Fanita Junction (Location: U.S. Marine Corps Air Station Miramar): Along this four-mile segment, the project consists of the installation of a new 230kV circuit on a vacant position on existing towers from the Sycamore Canyon Substation to Fanita Junction, along with the reconductor of an existing 138 kV line, replacement of nine two-pole wood structures to facilitate the 138 kV reconductor, replacement of two existing lattice towers with two tubular steel poles at Fanita Junction, installation of three new wood poles at Fanita Junction and installation of a fiber optic line on the existing 230kV towers.

Fanita Junction to Miguel Substation (Location: Cities of San Diego, Santee and unincorporated San Diego County): Along this 24-mile segment, the project consists of the installation of a new second 230kV circuit between Fanita Junction and SDG&E's Miguel Substation in vacant positions on the 230kV transmission structures approved as part of SDG&E's Miguel-Mission 230kV #2 Project. The Miguel-Mission 230kV #2 Project is a stand-alone project that was reviewed by the CPUC under a separate CPCN proceeding (A.O2-07-022) and EIR analysis. Analysis of the second 230kV circuit between Fanita Junction and the Miguel Substation was conducted in the Miguel-Mission 230kV #2 Project EIR, because of the direct connection with the 230kV transmission structures approved as part of the Miguel-Mission project and likelihood of being proposed in the future (Miguel-Mission 230kV #2 Project Final EIR, June 2004).

Miguel Substation to South Bay Power Plant (Location: Cities of Chula Vista and unincorporated San Diego County): Along this ten-mile segment, the project consists of the installation of a new ten-mile overhead 230kV circuit from the Miguel Substation to the Duke Energy South Bay Power Plant (South Bay Power Plant) switchyard area on approximately 63 new steel tubular poles, realignment of 3,000 feet of an existing 139 kV wood pole line leading into the Miguel Substation, and installation of a fiber optic line atop the existing 230kV structures.

South Bay Power Plant to Sicard Street Transition Area (Location: Cities of Chula Vista, National City, and San Diego and Naval Station San Diego) : Along this seven-mile segment, the project consists of modifications to approximately 50 existing bridge tower structures to accommodate a new 230kV circuit from the South Bay Power Plant to Sicard Street near the Main Street Substation, where the line would transition from overhead to underground, upgrade of an existing 138 kV twinned line on one side of the existing bridge structures to a 230kV line, installation of two new tubular steel poles near the South Bay Power Plant, reconductor of an existing 138 kV line on the existing bridge structures to accommodate a reconfiguration of the existing 138 kV circuits, and installation of fiber optic line on the existing structures.

Sicard Street Transition Area to Old Town Substation (Location: City of San Diego): Along this final seven-mile segment, the project consists of the installation of an underground 230kV cable in city streets from Sicard Street to SDG&E's Old Town Substation, construction of a new 0.1 acre transition station and associated 230kV dead-end steel pole at Sicard Street, and installation of fiber optic line within the underground duct bank.

Substation Modifications. In addition to the new 230kV electric transmission circuit and new transition station, there are proposed modifications to the Sycamore Canyon, Miguel, and Old Town Substations to accommodate the new 230kV circuits. All proposed modifications would occur with existing substation properties.

2.2 SDG&E's Stated Project Objectives

According to SDG&E, the OMPPA Transmission Project is needed to meet the following objectives:

Provide Full Dispatchability of Resources. The OMPPA Transmission Project would assure that the full output of the proposed Otay Mesa Power Plant generation can be delivered into the San Diego local reliability area (LRA). The OMPPA Transmission Project would also

concurrently provide capacity for other existing Reliability Must Run (RMR) resources and imports that are required to meet the G-1/N-1¹ reliability criterion.

Provide Firm Transmission Delivery of Otay Mesa Generation Project to Load Centers. The OMPPA Transmission Project would allow firm delivery of the output of the Otay Mesa Power Plant into SDG&E's LRA, and would deliver the output of the plant to major load centers at the Sycamore Canyon and Old Town substations, along with surrounding substations.

Mitigate Intra-Zonal Congestion. A significant transmission bottleneck currently exists at the Miguel Substation. The worst congestion condition for the Otay Mesa Power Plant would occur under pre-contingency (N-0) conditions when the output of the plant would significantly add to the flows through the Miguel Substation. Given this situation, dispatch of the plant's full capacity as an RMR resource cannot be guaranteed on a day-ahead basis unless adequate deliverability upgrades are installed.

According to SDG&E, the transmission plan of service for the Otay Mesa Power Plant avoids this problem by adding two 230kV lines and directly connecting these two lines with the two lines from the Otay Mesa Power Plant by bypassing the Miguel Substation. The output of the 615 MW plant, and the power that would normally be injected to the Miguel Substation, can thus completely bypass the Miguel Substation 230kV bus.

Meet G-1/N-1 Reliability Need Due to Future Load Growth. The CAL-ISO requires SDG&E to plan for a G-1/N-1 reliability scenario. With the OMPPA Transmission Project, the Otay Mesa Power Plant would be directly connected into the SDG&E LRA. This makes the Otay Mesa generating units available to fill the reliability need as identified in SDG&E's 20-year, long-term resource plan.

Provide for Expansion Capability for Future Load Growth and Possible Generation Retirement. SDG&E has stated that the interconnection of the Otay Mesa Power Plant and the construction of the 230kV transmission line to the Old Town Substation would provide strong backbone transmission support to the surrounding SDG&E service area, and be able to replace the local reliability currently provided by the antiquated South Bay Power Plant, that may be retired as early as December 2008. In the near-term, there is a minimum RMR requirement at the South Bay Power Plant to mitigate internal congestion. With the potential retirement of the South Bay Power Plant, the 230kV line from the Miguel Substation that passes by the South Bay Power Plant would allow looping of the proposed transmission line into a new 230/138/69kV

¹ For purpose of SDG&E capacity planning, this criterion requires that SDG&E have sufficient on-system resources and import capability to serve the 1- in 10-year peak summer demand forecast of the local reliability area during the worst G-1/N-1 event. In SDG&E's case, the worst G-1/N-1 event is currently an overlapping outage of the Encina 5 unit plus loss of the Southwest Power Link.

substation at South Bay. This connection would thereby eliminate this RMR need and allow retirement of the plant.

Allow Load Shedding and Mitigate Potential Cascading Outage During Miguel Corridor Outage. While the event of having multiple lines out is very remote, planning for loss of an entire corridor is required by criteria established by the Western Electricity Coordinating Council and the North American Electric Reliability Council. Such an event occurred during the recent San Diego firestorm in October 2003 when multiple 69kV, 138kV, and 230kV lines on the Miguel corridor were forced out due to fire under these lines. The OMPPA Transmission Project helps to mitigate such events.

Provide Cost Savings to Customers by Meeting Some of the CA-ISO Reliability Must Run (RMR) Contract Requirements. According to SDG&E, one of the benefits SDG&E customers would receive from the OMPPA Transmission Project is SDG&E's ability to meet some of the area's RMR needs. The CAL-ISO, as part of its role to ensure grid reliability, has entered into RMR contracts with generating plants in SDG&E's service area. These contracts give the CAL-ISO the right to call on RMR plants to deliver power when needed for grid reliability and to manage intra-zonal congestion. The cost associated with the RMR contracts for units located in SDG&E's service area has been rising each year and is passed on to SDG&E's customers. According to SDG&E, the OMPPA Transmission Project would provide cost savings to customers, by meeting some of the RMR needs.

3.0 SUMMARY OF CEQA SCOPING COMMENTS

Section 3.0 summarizes the scoping comments received from federal, state and local agencies, local planning groups, private and public organizations, and the general public. Comments are organized by issue area. Within each issue area, written comments provided on the NOP by agencies and organizations are summarized first, followed by additional oral comments provided during the scoping meetings. Reference should be made to APPENDIX B for the full summary of oral comments provided at each scoping meeting, and APPENDIX C for full copies of NOP comment letters.

3.1 Project Description and Objectives

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The City of Chula Vista is concerned that SDG&E is piecemealing a larger project. According to the City of Chula Vista, SDG&E has filed a number of additional requests for transmission upgrades or changes in the region and identified plans for additional projects and changes not yet filed, including: the original OMPPA, the Miguel-Mission 230kV No. 2 Project, an additional 6 miles of 138kV conductors from South Bay to Main Street, planned additional coastal permit conformation for Chula Vista/National City Bayfront, and a 500kV project (application R.04-04-003). Projects related to generation or transmission of power outside the region should be reviewed as a single project.
- The City of Chula Vista states that the proposed project is designed to address transmission congestion caused by the delivery of power to SCE and PG&E services territories from power plants located east and south of their service area. If congestion from power plants outside the region is creating the need for additional transmission, then the EIR should fully disclose all aspects of the project including an explanation for the long-term uses of the transmission line.
- Based on the most recent growth forecasts for the region, as part of the CEQA process, SDG&E must disclose the need for the current project as well as identify alternatives for a more permanent solution for relieving the regional congestion outside the proposed transmission corridor.
- The NOP project description may not be accurate since SDG&E's application relied on the Ramco Intermediate Load Facility, that may no longer be viable in the City. The EIR should evaluate the project with and without the Ramco Facility.
- The City of Chula Vista questions whether the proposed project would utilize existing service roads, and/or establish new permanent service roads. The EIR should discuss

the type, size, and location of proposed roads, and include in the EIR impact assessments.

- The City of Chula Vista questions whether the proposed project includes fiber optic lines, similar to the Sycamore Canyon to Fanita Junction segment. If so, the EIR should indicate which segments will receive fiber optic lines and their intended purpose, and the potential for expanded uses of the lines.

Environmental Health Coalition (EHC), San Diego, California

- EHC requests that the EIR analyze the potential impacts the proposed project will result in, due to importation of power from power plants in Mexico and outside the region. EHC believes the project would strongly increase the region's capability of importing energy into the region that is generated from power plants in Mexico and outside the region, where regulatory rules and regulations vary. As a result, EHC requests that the EIR include an analysis of the environmental impacts of importing energy from outside the region, especially from areas where federal air quality standards do not apply, but share a common air basin with California.
- SDG&E's original cost estimate for connecting to the Otay Mesa Project to the transmission grid at Miguel Substation was approximately \$16 million dollars. Now costs are projected at \$150-200 million. Clarification on this discrepancy was requested.

San Diego County Hispanic Chamber of Commerce, San Diego, California

- Expressed support for SDG&E's proposed project due to increased reliability that is needed in the region and would be provided by the OMPPA Transmission Project.

Downtown San Diego Partnership, San Diego California

- Expressed support for SDG&E's proposed project due to increased reliability that is needed in the region and would be provided by the OMPPA Transmission Project.

Sierra Club, San Diego Chapter, San Diego, California

- The proposed project will increase SDG&E's ability to import and export power into California from other more polluted sources with less stringent environmental laws than California, such as Mexico and Arizona. The project is counter to the idea of sustainable energy sources.
- SDG&E's original cost estimate for connecting to the Otay Mesa Project to the transmission grid at Miguel Substation was approximately \$16 million dollars. Now

costs are projected at \$150-200 million. Clarification on this discrepancy was requested.

City of Chula Vista, Conservation and Environmental Services Department, Chula Vista, California

- The question was posed regarding whether the project is consistent with the regional energy strategy. If the purpose of the project is to export energy, as opposed to providing reliability, then the project may not be needed.
- SDG&E's original cost estimate for connecting to the Otay Mesa Project to the transmission grid at Miguel Substation was approximately \$16 million dollars. Now costs are projected at \$150-200 million. Clarification on this discrepancy was requested.

Additional Public Scoping Meeting Comments from Private Citizens

- Expressed support for SDG&E's proposed project due to increased reliability that is needed in the region and would be provided by the OMPPA Transmission Project.
- The proposed project will increase SDG&E's ability to import and export power into California from other more polluted sources with less stringent environmental laws than California, such as Mexico and Arizona. The project is counter to the idea of sustainable energy sources.

3.2 Alternatives

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The City of Chula Vista references CEQA Guidelines, Section 15126.6 regarding describing a range of reasonable alternatives that could feasibly attain most of the basic project objectives and avoid or substantially lessen an of the significant environmental impacts of the proposed project.
- The EIR should evaluate alternative transmission designs that would avoid or lessen the visual impacts to the existing corridor.
- The City is concerned about the NOP's absence of an alternative that would address among other impacts, public health and safety issues by providing for underground facilities through the City, similar to the underground cable proposed in the City of San Diego. City requests that an underground alternative be evaluated in the EIR, since it could lessen the potential for significant impacts to aesthetics, biology, land use and recreation. An underground alternative could avoid potentially significant

impacts to sensitive environmental resources, and uphold the City's overall goals of the respective redevelopment plans, while still meeting the project's stated objectives.

- The City requests that the EIR include the evaluation of an alternative that would bypass the City's incorporated boundary.
- The City states that, based on the most recent growth forecasts for the region, as part of the CEQA process, SDG&E must disclose the need for the current project as well as identify alternatives for a more permanent solution for relieving the regional congestion outside the proposed transmission corridor. The City requests that the EIR include the evaluation of alternatives that consider relieving the regional congestion outside the proposed transmission corridor.

San Diego Unified Port District, San Diego, California

- The EIR should evaluate an alternative that would involve replacement of the South Bay Power Plant, which could result in no new transmission lines located through the Chula Vista Bayfront Master Plan (CVBMP) planning area.

Centre City Development Corporation (CCDC), San Diego, California

- CCDC staff has been meeting with SDG&E to try to identify an appropriate location for the proposed project to avoid impacts to the North Embarcadero Visionary Plan (NEVP) and /or the pedestrian bridge. In the event that a location within Pacific Highway cannot be determined, due to existing utilities or conflicts within the right-of-way, an alternative project location should be considered (e.g. Kettner Boulevard).

Duke Energy North America (Duke Energy), Houston, Texas

- Duke Energy is concerned that the alternatives considered in the EIR fully consider all potential impacts, including impacts related to potential new generation projects and related transmission facilities to serve San Diego and the South Bay Substation area.
- Since transmission upgrade alternatives as well as potential mitigation measures associated with the OMPPA Transmission Project may also impact the South Bay Energy Facility (SBEF) interconnection, Duke Energy urges the EIR to consider impacts on SBEF interconnection alternatives. As an example, the evaluation of the OMPPA Transmission Upgrade No. 3 Alternative should also consider the potential for the SBEF to also interconnect at a new South Bay Substation.

- The evaluation of underground alternatives similarly consider if such alternatives would make infeasible, or significantly increase the costs of subsequent interconnections of SBEF if not properly engineered and located.

Environmental Health Coalition (EHC), San Diego, California

- EHC is concerned that the EIR fully consider all environmental impacts and alternatives that may reduce or eliminate those impacts. Requests that the CPUC analyze alternative options, such as undergrounding the transmission lines on the Chula Vista Bayfront, avoid running above-ground transmission lines through densely populated areas such as the Chula Vista Bayfront, and moving the lines back to Bay Boulevard.
- Undergrounding the transmission lines on the Chula Vista Bayfront is suggested as an alternative to avoid wildlife impacts associated with bird strikes near the Sweetwater National Wildlife Refuge, the Pacific Flyway, critical habitat, and foraging behavior of hawks and owls.
- EHC requests that the EIR analyze other potential project alternatives that contemplate building transmission to renewable energy resources.
- EHC also requests that the EIR alternatives should consider existing regional land use plans and processes. Specifically, EHC recommends that the EIR analyze a project option that includes the undergrounding of transmission lines on the Chula Vista Bayfront.

City of Chula Vista, Conservation and Environmental Services Department, Chula Vista, California

- Stated that transmission lines should be undergrounded in the City of Chula Vista and along the Chula Vista Bayfront. Potential conflicts with bayfront land use plans, the Sweetwater Marsh National Wildlife Refuge, and aesthetics were noted.
- The EIR should consider the non-wires alternative, as well as an alternative that is not dependent on fossil fuels and helps import renewable energy.
- The savings and benefits of upgrading the existing facilities should be examined and compared to underground options.
- The City of Chula Vista wants to reduce fossil fuel consumption, and repower the Southbay Power Plant. Use of Southbay should be considered in the EIR alternatives analysis.

Green Party of San Diego County, South Bay Greens Local, Chula Vista, California

- Stated that transmission lines should be undergrounded in the City of Chula Vista and along the Chula Vista Bayfront. Potential conflicts with bayfront land use plans were noted.
- Requested cleaner, more reliable sources of power as an alternative.
- The original route for the project was through rural areas, requested that an alternative route be proposed to go through rural areas instead of densely populated areas, consistent with SDG&E's original policy.

Sierra Club, San Diego Chapter, San Diego California

- The EIR should consider the non-wires alternative, as well as the use of solar energy versus natural gas, and renewable energy sources.

Additional Public Scoping Meeting Comments from Private Citizens

- Stated that transmission lines should be undergrounded in the City of Chula Vista and along the Chula Vista Bayfront. Potential conflicts with bayfront land use plans, the Sweetwater Marsh National Wildlife Refuge, and aesthetics were noted.
- The EIR should consider the non-wires alternative, as well as the use of solar energy versus natural gas, and renewable energy sources.

3.3 Human Environment Issues

3.3.1 Land Use Compatibility and Recreation Impact Issues

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR should include an analysis of all potential impacts to residences and businesses in affected areas and to overall community character of neighborhoods.
- The EIR should evaluate the overall focus of each open space and recreational facility and identify any direct and indirect impacts that the project would have on the focus/purpose of these recreational areas.

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The EIR should address potential conflicts with the City's vested interests in revitalizing several of the communities potentially affected by the project.
- The EIR should discuss the proposed project's consistency with the overall goals of the City's adopted land uses and development programs including the City's General Plan (as amended), the Southwest, Bayfront and Midbayfront Redevelopment Plans and the Montgomery Specific Plan.
- The EIR should discuss the potential impacts of the project on the City's numerous parks located within and adjacent to the existing SDG&E transmission corridor, including the impacts to park operations, access, character, and the park's ability to uphold conformance to the City's Park Master Plan.

San Diego Unified Port District, San Diego, California

- The EIR must evaluate potential conflicts of the proposed project with land uses in the CVBMP.

Centre City Development Corporation (CCDC), San Diego, California

- The EIR must evaluate the impacts of the proposed transmission line on the North Embarcadero Visionary Plan. The Chula Vista Bayfront Project was listed as potentially being affected by the transmission project, but the North Embarcadero Visionary Plan was not.

San Diego Convention Center Corporation (SDCCC), San Diego, California

- Construction of the proposed project will restrict access or the use of existing commercial, recreational and industrial land uses.

Environmental Health Coalition (EHC), San Diego, California

- EHC is concerned about the industrialization of land in Chula Vista, that limits future land uses and people's use.
- According to EHC, the current transmission lines, and any potential replacement, constitute a social and environmental injustice for residents in Chula Vista, who have disproportionately borne the adverse impacts of the transmission lines for decades.
- Land use planning processes for the Chula Vista Bayfront have assumed that the existing transmission lines would eventually be undergrounded. This project may

impact the land use plans for the bayfront area. The area is currently blighted, but there is a vision to redevelop the area, and this project is inconsistent with that vision.

San Diego Gas and Electric, San Diego, California

- SDG&E's states that the PEA has already evaluated impacts to land use and planning, and with SDG&E's standard practices and other project description measures, no significant impacts would result.
- SDG&E recommends that after the CPUC independently verifies the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

Green Party of San Diego County, South Bay Greens Local, Chula Vista, California

- There are five elementary schools and one high school located near the proposed project. How will the project affect these facilities, including air quality and EMF?
- How will the project affect the Sweetwater Marsh National Wildlife Refuge?
- What will be the impacts to property values?

Additional Public Scoping Meeting Comments from Private Citizens

- A permanent access road along SDG&E's right-of-way will cause unmanaged off-road vehicle activity.

3.3.2 Visual/Aesthetic Issues

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Caltrans states that the OMPPA Transmission Project would have potential visual impacts to motorists traveling on state highway facilities including State Route 94 (SR-94), State Route 67 (SR 67), Interstate 5 (I-5), Interstate 805 (I-805) and Interstate 8 (I-8).
- Visual impacts resulting from ground disturbances in Caltrans rights-of-way must be detailed.
- All lighting (including reflected sunlight) should be placed and/or shielded so as not to be hazardous to vehicles traveling on State Routes.

County of San Diego, Department of Planning and Land Use

- The County recommends that a Visual Impact Study be prepared and included in the EIR, to analyze impacts resulting from new overhead transmission lines, tubular steel poles and the realignment of existing wood poles.

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The City of Chula Vista indicates that the proposed project may significantly impact views from established open space/recreational areas, including community parks and the Sweetwater Marsh National Wildlife Refuge.
- The EIR should evaluate potential impacts to the goals and objectives that are contained in the City's General Plan (as amended), including plans for a contiguous greenbelt, open space, trail system around the City beginning along the Bayfront corridor.
- The EIR should evaluate alternative transmission designs that would avoid or lessen the visual impacts to the existing corridor.

San Diego Unified Port District, San Diego, California

- The Port of San Diego states that although the proposed project proposes to maintain heights of the existing towers, the EIR must evaluate the potential impact of visibility of the overhead transmission line and new tubular poles from the CVBMP planning area.

Centre City Development Corporation (CCDC), San Diego, California

- CCDC expresses concerns regarding potential conflicts between the proposed underground project and CCDC's NEVP and pedestrian bridge projects near Harbor Drive and Park Blvd.
- Regarding the NEVP, CCDC states that the heat generated by the underground transmission line will dictate the separation needed to assure that any landscaping planted within the Pacific Highway median can thrive and serve its intended aesthetic purpose.
- Regarding CCDC's Park Blvd./Harbor Drive proposed pedestrian bridge plan, the proposed project may need to be redesigned to avoid conflicts between the pedestrian bridge footings and the underground transmission lines.

Environmental Health Coalition (EHC), San Diego, California

- EHC believes that running the overhead lines through densely populated areas of Chula Vista will create aesthetic blight due to industrialization of land.

San Diego Gas and Electric, San Diego, California

- SDG&E states that the EIR should assess the relatively minor, incremental effects of adding conductor to existing facilities and focus on where new steel poles are proposed that are visible from public views such as major roads and recreation areas.
- The EIR visual assessment should also take into account recreational facilities that have been placed within SDG&E's rights-of-way through cooperation with local municipalities.

Additional Public Scoping Meeting Comments from Private Citizens

- What will be the visual effects of the different types of poles being considered for the project?

3.3.3 Public Services and Utilities Issues

San Diego County Water Authority, San Diego, California

- The San Diego County Water Authority states the OMPPA Transmission Project may have potential effects to the La Mesa/Sweetwater Extension Pipeline I the Eucalyptus Hills area east of Santee, and Second Aqueduct I the Eastlake area of Chula Vista.

Sweetwater Authority, Chula Vista, California

- The EIR should discuss potential disruption of local and regional services provided through underground utilities, including the Authority's underground water mains and pipelines.

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The EIR should include discussion of the proposed project's affects on future operations of the South Bay Power Plant and the potential for removal of the current RMR designation.

Centre City Development Corporation (CCDC), San Diego, California

- Based on CCDC's work on the North Embarcadero Project and the construction of Petco Park, CCDC states there are many existing utilities in Pacific Highway and Harbor Drive, with a number of utility projects having been undertaken in the last year, with more to come. The identification of impacts to existing and proposed utilities needs to be addressed.

San Diego Convention Center Corporation (SDCCC), San Diego, California

- SDCCC states that construction along streets and liner ROWs could disrupt local and regional services provided through underground utilities. Disruption of power to the Convention Center during events at the Convention Center is not an acceptable pro forma.

3.3.4 Traffic and Transportation Issues

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Caltrans states that the OMPPA Transmission Project could result in potential impacts to state highway facilities including SR-94, SR-67, I-5, I-805 and I-8.
- All roadway features (signs, pavement delineation, roadway surface, etc.) within Caltrans rights-of-way must be protected or maintained in a temporary condition and restored.
- Improvement plans for construction must include typical cross-sections, adequate structural sections, traffic handling plans and signing and striping plans stamped by a professional engineer.

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR should include a Traffic Impact Analysis (TIA), based on all existing and future county roads that will be affected during project construction. The EIR analysis should identify which routes will be used to transport materials to/from the project sites. The TIA should include a summary table that identifies the roadway segment and intersection LOS for all scenarios. LOS summary table should also identify the net increase in traffic volumes or intersection delays due to the project-related traffic, whether the project as a significant direct or cumulative impact, and mitigation measures for improving conditions at affected roads and intersections.
- Specific traffic and transportation impact issues that should be evaluated in the EIR include displaced parking; impacts to private residence access driveways, temporary

closures of bicycle lanes; impacts associated with construction routes and truck volumes, types and sizes; cumulative impacts to study area roads, and verification that the project will comply with the County's Traffic Impact CEQA thresholds.

- Specific traffic and transportation data requirements for EIR and/ or subsequent permit applications, include: identification of components of projects within county roadways; identification of alternative access roads for affected county areas and roads, trip generation summary, verification that overhead lines near roads designated on Oversize Load Highway System will meet clearance requirements.
- A Traffic Control Plan may be required

City of Chula Vista, Planning and Building Department, Chula Vista, California

- The EIR should address potential construction related impacts, specifically traffic impacts to adjoining properties and adjacent roadways.

City of San Diego, Development Services Department, San Diego, California

- The EIR traffic study should adequately address the potential impacts of, and mitigation measures for, the project on City streets, including Harbor Drive, Pacific Highway and Linda Vista Road.

San Diego Unified Port District, San Diego, California

- The EIR must evaluate the potential impacts of the proposed project on parking and traffic during construction.

Centre City Development Corporation (CCDC), San Diego, California

- The EIR must analyze the impacts of the proposed transmission project on the center median of Pacific Highway or the footing locations for the pedestrian bridge. Potential conflicts have the potential to affect transportation, parking and traffic, especially during construction.

San Diego Convention Center Corporation (SDCCC), San Diego, California

- SDCCC states their support for the project. SDCCC also states that it is critical that close coordination take place well in advance to ensure there is no impact to the convention center or its attendees. The roadway surface along Harbor Drive (between Pacific Highway and Eighth Avenue), must be returned to its current pristine state.

- The intersection of Harbor Drive and Eighth Avenue is the sole and single means of access for delivery of all major convention/trade show freight to the Convention Center. Major convention/trade shows can entail the movement of approximately 280 heavy truck tractor/trailer crossings at this intersection, with total move-in and move-out days for this type of event averaging four to five days.
- The underground portion of the project could affect traffic flow, parking, road usage and property access where lane closures are planned, including Harbor Drive, Eighth Avenue, Fifth Avenue, First Avenue, Front Street and Pacific Highway.
- SDCCC suggests the following mitigation measures be provided:
 - Coordinating trenching schedule with the Convention Center, with ingress and egress to be provided at all times.
 - Opened trenches to be covered with steel plates to allow maximum weight allowances for traffic at this intersection.
 - Also notes, as a mitigation recommendation, that there be insurance of ingress and egress lands to and from the truck marshalling area for the Convention Center, which is located next to the Park and Ride lot on Airport Property on Pacific Highway.

3.3.5 Air Quality Issues

San Diego Convention Center Corporation (SDCCC), San Diego, California

- SDCCC is concerned about daytime construction delays on Harbor Drive at or near the Convention Center that may result in truck and other vehicular traffic at an engine idle, that could affect air quality/pollution. SDCCC suggests that mitigation include nighttime work along Harbor Drive at or near the Convention Center, and coordination with the Convention Staff to determine event schedules with moderate to heavy truck traffic.

San Diego Gas and Electric, San Diego, California

- SDG&E states that the PEA provides a worst-case estimate of potential construction air quality impacts and has determined that no local, state or federal standards would be exceeded by the project.
- Compliance with San Diego Air Pollution Control District (APCD) Rules and SDG&E standard practices would further reduce any potential impacts.
- SDG&E recommends that the CPUC remove this issue from further analysis in the project EIR, following independent verification of the analysis and its conclusions.

Environmental Health Coalition (EHC), San Diego, California

- Power would be imported from “dirty” sources out-of-state, which will increase overall impacts to air quality and the environment. Cleaner, reliable sources of power should be considered as an alternative.

Green Party of San Diego County, South Bay Greens Local, Chula Vista, California

- There are five elementary schools and one high school located near the proposed project. How will the project affect these facilities, including air quality.
- Power would be imported from “dirty” sources out-of-state, which will increase overall impacts to air quality and the environment. Cleaner, reliable sources of power should be considered as an alternative.

Sierra Club, San Diego Chapter, San Diego, California

- Sierra Club does not want to deprive needed energy, but questions the source and cleanliness of the energy for the project.

Additional Public Scoping Meeting Comments from Private Citizens

- Power would be imported from “dirty” sources out-of-state, which will increase overall impacts to air quality and the environment. Cleaner, reliable sources of power should be considered as an alternative.

3.3.6 Noise Issues

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR should include an Acoustical Analysis summarizing applicable standards and detailing major noise sources resulting from the project.
- The EIR should evaluate the following issues:
 - Exposures of persons to, or generation of noise levels in excess of, the County’s Noise ordinance standards or other applicable standards,
 - Exposure of persons to, or generation of ,excessive groundborne vibration or groundborne noise levels.
 - Substantial temporary or periodic increases in ambient noise levels,
 - Potential impacts to sensitive avian habitat such as Coastal Sage Scrub, based on the seasonal 60-decibel hourly limit for project-related construction activities.

San Diego Convention Center Corporation (SDCCC), San Diego, California

- Construction noise will occur near residences, recreational uses, hospitals or schools, as well as near the San Diego Convention Center. SDCCC suggests mitigation of coordination with the Convention Center so users of the Convention Center know potential noise impacts to their respective events.

San Diego Gas and Electric, San Diego, California

- SDG&E states that the PEA has already evaluated noise impacts, and with SDG&E's standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, SDG&E believes this issue should be removed from further analysis in the EIR.

3.3.7 Public Health and Safety Issues

Electro-Magnetic Effects (EMF)

Environmental Health Coalition (EHC), San Diego, California

- EHC believes that running the overhead lines through densely populated areas of Chula Vista may create a public health risk due to electro-magnetic fields. EHC notes that due to EMF concerns, future uses of land will be further limited over the existing conditions.

Green Party of San Diego County, South Bay Greens Local, Chula Vista, California

- How will EMF affect the five elementary schools and one high school located near the project?
- Undergrounding the lines in the City of Chula Vista would reduce impacts related to EMF.

Safety, Hazards and Hazardous Materials

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Potential impacts resulting from hazardous materials in Caltrans rights-of-way must be detailed.

State of California, Department of Toxic Substances Control, Cypress, California

- The EIR should identify all current and historic uses of the site that have resulted in a release of hazardous wastes/substances. Any sampling results for soil, air and groundwater to be summarized in a table.
- The EIR should identify any known or potentially contaminated sites within the proposed project area. A Phase I assessment may be sufficient to identify such sites.
- The EIR should identify the mechanism to initiate required investigations and/or remediation for any contaminated site, and the agency to provide appropriate regulatory oversight. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how investigations and/or remediation will be conducted and the government agency to provide appropriate regulatory oversight.

San Diego Convention Center Corporation (SDCCC), San Diego, California

- SDCCC questions whether the proposed project would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Current response times are 2.5 to 3 minutes, and as a standard of care, must be maintained by the Convention Center.

San Diego Gas and Electric, San Diego, California

- SDG&E states the PEA has already evaluated impacts to hazards and hazardous materials, and with SDG&E's standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

3.3.8 Population, Housing and Growth Inducement

San Diego Gas and Electric, San Diego, California

- The proposed project would not be growth inducing since it would not encourage or accelerate growth in the area, and no homes would be removed by the project as proposed. The project integrates future growth needs only in accordance with adopted general plans and independent regional agency projects.
- SDG&E states that after the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

3.4 Natural Environment Issues

3.4.1 Geology and Soils Issues

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Impacts to soils and drainage, including increased runoff to state facilities and modification of existing drainage, must be detailed.

San Diego Gas and Electric, San Diego, California

- SDG&E states that the PEA has already evaluated impacts to geology and soils, and with SDG&E's standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

3.4.2 Hydrology and Water Quality Issues

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Potential impacts to water quality resulting from ground disturbances in Caltrans rights-of-way must be detailed.

Sweetwater Authority, Chula Vista, California

- The EIR should evaluate potential impacts related to hydrology and water quality and take into consideration the operation and monitoring programs of the Authority's groundwater programs.

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR should identify county mapped hydrologic features, including hydrologic basins, 100-year flood boundaries, surface waters, and groundwater resources.
- The EIR should analyze whether the project will substantially alter the existing drainage patterns, resulting in substantial erosion, siltation or flooding, or contribute to runoff water that would exceed existing or planned storm water drainage systems' capacity.

- The EIR should analyze whether the project would violate section 303(d) of the Clean Water Act, contribute to exceedances of applicable surface or groundwater water quality objectives, degrade beneficial uses, or violate any waste discharge requirements.

City of San Diego, Capital Improvements Program, San Diego, California

- The City of San Diego encourages the use of reclaimed water during construction and for irrigation of landscaping.

San Diego Gas and Electric, San Diego, California

- SDG&E states that the PEA has already evaluated impacts to hydrology and water quality, and with SDG&E's standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

3.4.3 Biological Issues – Impacts to Plants and Wildlife

United States Fish and Wildlife Service, Carlsbad, California

- As required under the SDG&E Subregional Natural Community Conservation Plan (NCCP), Section 7.1.3, U.S. Fish and Wildlife Service protocol surveys are required for all new projects that are defined as projects requiring CEQA review. Therefore, protocol surveys should be conducted for all federally listed species that may occur within the project area.
- As required under the NCCP, take of narrow endemic species is to be avoided for new projects, such as the proposed project.
- The Quino checkerspot butterfly is not currently a covered species under the NCCP. SDG&E and the U.S. Fish and Wildlife Service are developing a Quino Amendment, and it is anticipated that the Amendment will be finalized by the beginning of 2005. However, if the Amendment is not finalized prior to project construction, then SDG&E will not have a take permit for Quino under the NCCP.
- The U.S. Fish and Wildlife Service and SDG&E have finalized a Vernal Pool Clarification to the NCCP that identifies avoidance, minimization, and mitigation measures for vernal pool species and their supporting habitat (i.e., vernal pools).

Therefore, impacts to vernal pools can be authorized under the NCCP, if the project includes measures consistent with the Vernal Pool Clarification.

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Biological impacts resulting from ground disturbances in Caltrans rights-of-way must be detailed.

County of San Diego, Department of Planning and Land Use, San Diego, California

- A Biological Resources Report should be prepared and included in the EIR to address the following issues between the Southbay Power Plant Area and the Miguel Substation:
 - Potential disturbances to wetlands, lakes, streams, and/or waters of the U.S. Recommends notification to the ACOE and CDFG.
 - Potential adverse effects on any sensitive natural community or species identified as a candidate, sensitive, or special status species by the CDFG or USFWS.
 - Potential conflicts with provisions of any adopted HCP, NCCP or other approved plan, policies or ordinances.

City of Chula Vista, Planning and Building Department, Chula Vista, California

- Project construction could impact rare, threatened, or endangered species in the project area and potentially interfere with regional wildlife movement and movement corridors. Primary concerns are impacts to the Sweetwater Marsh National Wildlife Refuge, and corridor areas designated as Preserve in the City's MSCP Subarea Plan. The EIR should include an analysis of these impacts.

Environmental Health Coalition (EHC), San Diego, California

- The EIR should fully analyze potential impacts of above-ground transmission lines on wildlife in the area, including impacts of bird strikes near the Sweetwater National Wildlife Refuge, Pacific Flyway, critical habitats, and foraging behavior of hawks and owls.

San Diego Gas and Electric, San Diego, California

- SDG&E provides information on agreements with USFWS and CDFG for the NCCP. SDG&E states the NCCP agreement should be integrated into the environmental baseline and frame the discussion of potential project impacts, relative to the NCCP

already being in place. USFWS and CDFG cannot extract further obligations from SDG&E beyond what is contained in the NCCP.

City of Chula Vista, Conservation and Environmental Services Department, Chula Vista, California

- The project goes through some of the most sensitive habitat areas in Chula Vista. Other alternatives should be considered.

Green Party of San Diego County, South Bay Greens Local, Chula Vista, California

- Concern was expressed regarding potential impacts to habitat in the Chula Vista Bayfront and Sweetwater Marsh National Wildlife Refuge. How will wildlife movement and habitat conservation plans be affected?

3.4.4 Cultural and Paleontological Resource Issues

Cultural Resources

U.S. Department of Interior, Bureau of Indian Affairs, Pacific Regional Office, Sacramento, California

- The BIA expressed concern regarding potential effects of the proposed transmission lines to lands held in trust for Indian Tribes in San Diego County

State of California, Native American Heritage Commission (NAHC), Sacramento, California

- NAHC outlines steps that should be taken to assess and mitigate potential effects to archaeological resources and Native American sacred sites and human remains.

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Potential impacts to cultural resources, resulting from ground disturbances in Caltrans rights-of-way must be detailed.

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR and associated technical studies address the following, in order to not result in significant environmental impacts to cultural resources:

- Identify areas of known, suspected significant cultural resources within unincorporated county lands
- Evaluate whether the project will cause a change in the significance of historic or archaeological resources, as defined in State CEQA Guidelines, Section 15064.5
- Recommends that a field survey for archaeological artifacts and features be conducted, and outlines report recommendations.

City of San Diego, Development Services Department, San Diego, California

- The proposed project facilities will be constructed within the City’s Sensitive Historical Resource Overlay Zone. The EIR should include a cultural resources technical report, that adequately addresses potential impacts to sensitive historical and archaeological resources and provides appropriate mitigation for any impacts.

San Diego County Archaeological Society, Inc.

- Pleas that cultural resources are include in the list of subject areas to be addressed in the EIR.

San Diego Gas and Electric, San Diego, California

- SDG&E’s PEA has already evaluated impacts to cultural resources, and with SDG&E’s standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

Paleontological Resources

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- Potential impacts to paleontological sites, resulting from ground disturbances in Caltrans rights-of-way must be detailed.

County of San Diego, Department of Planning and Land Use, San Diego, California

- The EIR and associated technical studies should address the following, in order to not result in significant environmental impacts to cultural resources:

- Identify areas of known, suspected significant paleontological resources within unincorporated county lands.
- Recommends that if earthwork will occur within potential fossil-bearing formations, a paleontological monitor should be on-site if grading will result in cuts of five feet or greater.

San Diego Gas and Electric, San Diego, California

- SDG&E’s PEA has already evaluated impacts to paleontological resources, and with SDG&E’s standard practices and other project description measures, no significant impacts would result.
- After the CPUC independently verify the PEA analysis and conclusions, this issue should be removed from further analysis in the EIR.

3.5 EIR Administrative, and Permitting Comments

U.S. Department of Interior, Bureau of Indian Affairs, Pacific Regional Office, Sacramento, California

- Requests copies of EIR and any other environmental documents related to the OMPPA Transmission Project.

State of California, Native American Heritage Commission, Sacramento, California

- Provides recommendations regarding procedures for consultations, record searches, surveys and associated reports and mitigation measures.

State of California, Department of Transportation (Caltrans), District 11, San Diego, California

- All work performed within Caltrans’ rights-of-way will require an encroachment permit.
- Traffic control measures must be provided for all overhead/underground alternatives, as part of the encroachment permit application. Impacts to traffic must be detailed for overhead/underground stations, within Caltrans rights-of-ways.
- The encroachment permit application must include all environmental impacts within Caltrans rights-of-way, including avoidance and minimization efforts as applicable, and provide mitigation measures associated with those impacts. The indirect effects of any mitigation within Caltrans rights-of-way must also be addressed.

- Traffic control plans are required prior to construction, in accordance with Caltrans' Manual for Construction and Maintenance Work Zones. Pedestrian and bicycle detours/traffic restrictions also need to be addressed.

State of California, Department of Toxic Substances Control, Cypress, California

- Identifies a range of investigations and remedial actions that should be conducted on the site, prior to construction as part of mitigation, including investigations for pesticide residue, hazardous waste related to dairy and cattle industry operations, hazardous chemicals, lead-based paints and asbestos, other soil contamination.
- Describes applicable agencies, laws, and regulations that must be complied with if wastes are generated by the proposed project operations, or if contaminated soil and groundwater is encountered.

San Diego County Water Authority, San Diego, California

- Where facilities are proposed within the San Diego County Water Authority easement or right-of-way, design plans must be submitted for review, and agreements may be required.

County of San Diego, Department of Planning and Land Use, San Diego, California

- Potential permits that may be required include a grading permit, a habitat loss permit and a construction and encroachment permit.

The City of San Diego, Land Development Review Division, Water Review Section

- No comments on the subject project are provided.

City of San Diego, Capital Improvements Program, San Diego, California

- The use of reclaimed water during construction and for irrigation of landscaping is encouraged.

Calpine, Dublin, California

- Calpine is concerned about the EIR and General Proceeding schedules. References the CPUC's Decision 04-06-011 and sets forth a proposed schedule that would complete the General Proceeding and Environmental Review Processes by May 2005.

San Diego Archaeological Society, Inc.

- Requests to be included in the distribution of the DEIR, when it becomes available.

San Diego Gas and Electric, San Diego, California

- SDG&E is concerned about the EIR and General Proceeding schedules. Indicates that schedule should be adjusted and expedited to correspond to dates in SDG&E's contract with Calpine.
- SDG&E suggests that the CPUC rely heavily on information provided in SDG&E's Application and PEA.

City of Chula Vista, Conservation and Environmental Services Department, Chula Vista, California

- Request was made to include the downtown and south Chula Vista libraries as additional information repositories for the project.

Additional Public Scoping Meeting Comments from Private Citizens

- Request was made to include the downtown and south Chula Vista libraries as additional information repositories for the project.

Requests were made for information from the CPUC regarding funding for the project.