

PUBLIC SCOPING REPORT

San Diego Gas and Electric Company Silvergate Transmission Substation Project CPCN Application No. 05-03-024

State Clearinghouse No. 2005081106

LEAD AGENCY:

CALIFORNIA PUBLIC UTILITIES COMMISSION

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1.0 OVERVIEW OF CEQA SCOPING PROCESS

1.1 Introduction

On March 30, 2005, San Diego Gas and Electric (SDG&E) filed an application (A.05-03-024) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the Silvergate Transmission Substation Project. According to SDG&E, the project is proposed to upgrade aging and obsolete equipment at SDG&E's Main Street Substation, provide increased substation reliability, provide increased bulk power transmission system reliability, provide expansion capability for load growth and potential generation additions, and work with local governments to achieve long-term land use goals. SDG&E is proposing to replace the aging 138/69 kV Main Street Substation with a new 230/69 kV substation (Silvergate). The new Silvergate Substation would be located across the street from the existing Main Street Substation on SDG&E owned property and on adjoining property in the Barrio Logan community in the City of San Diego. In addition, SDG&E is proposing two associated projects: installation of a Special Protection System at the transmission substations dispatching power from the South Bay Power Plant, undergrounding of a 138 kV line and removal of lattice steel bridge structures located within SDG&E's right-of-way (ROW) between South Bay Power Plant and the Sweetwater River.

The Scoping Report documents the CPUC's CEQA scoping process and the comments received for the proposed Silvergate Transmission Substation Project EIR. Specifically, the Scoping Report describes the scoping activities and documents the written and oral comments received on the proposed Silvergate Transmission Substation 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 Silvergate Transmission Substation 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 scoping process for the subject project was initiated with the publication of the NOP on August 23, 2005. The NOP is contained in APPENDIX A-1 of the Scoping Report. The NOP was sent to 18 federal agencies, 28 state agencies, and 51 local agencies and planning groups. The NOP was also distributed to 22 private organizations, 17 Native American groups, and 6 local libraries. Concurrent with the distribution of the NOP, over 310 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 September 23, 2005. In total, 13 letters and written comments, and two (2) 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 two public scoping meetings:

- September 12, 2005, Chula Vista Civic Center Library 2:00 – 4:00 p.m., 365 “F” Street, Chula Vista, California
- September 12, 2005, San Diego Central Library, 6:00 – 8:00 p.m., 820 “E” Street, San Diego, 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 nine persons attended the scoping meetings, including representatives from two local agencies, one organization and no 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 Agenda, Power Point Presentation, and Scoping Comment forms.

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 18 federal agencies, 28 state agencies, and 51 local agencies and planning groups. The NOP was also distributed to 22 private organizations, 17 Native American groups, and 6 local libraries. The NOP Distribution List is contained in APPENDIX A-4.

1.4 Public Notification

Public notification for the Silvergate Transmission Substation 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 August 19, 2005. Concurrent with the distribution of the NOP, Public Notices regarding the project and CEQA scoping process were distributed to over 310 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 Silvergate Transmission Substation Project at: <http://www.dudek.com/cpuc/sdge-silvergate/>.

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

U.S. Fish and Wildlife Service, September 23, 2005

State Agencies

California Department of Fish and Game, September 20, 2005

California Department of Transportation, District 11, September 19, 2005

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, August 19, 2005

Department of Toxic Substances Control, October 12, 2005

Native American Heritage Commission, August 31, 2005

Local Agencies and Planning Groups

Centre City Development Corporation, September 20, 2005

City of San Diego, Land Development Review Division, September 21, 2005

County of San Diego, Solid Waste Local Enforcement Agency, September 23, 2005
Unified Port of San Diego, Planning Services, September 21, 2005

Public and Private Organizations

Environmental Health Coalition, September 23, 2005
Goodrich Aeronautics Group, September 12, 2005 (oral comment only)
San Diego County Archaeological Society, August 22, 2005
San Diego Gas and Electric, September 23, 2005

Private Citizens

No comments were received.

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 Silvergate Transmission Substation 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 Silvergate Transmission Substation Project Facilities

As proposed by SDG&E, the project would replace the aging 138/69 kV Main Street Substation with a new 230/69 kV substation (Silvergate). The new Silvergate Substation would be located across the street from the existing Main Street Substation on SDG&E owned property and on adjoining property in the Barrio Logan community. In addition, SDG&E is proposing two associated projects: installation of a Special Protection System at transmission substations dispatching power from the South Bay Power Plant and 138 kV line undergrounding and removal of lattice steel bridge structures located within SDG&E's right-of-way (ROW) between South Bay Power Plant and the Sweetwater River.

As described below, the three primary project components to be evaluated in the Silvergate Transmission Substation Project EIR include 1) a new 230/69 kV Silvergate substation; 2) installation of a Special Protection System; and 3) 138 kV undergrounding and lattice steel bridge structures removal.

Silvergate Substation

The new Silvergate Substation would be approximately five acres in size and would be located across the street from the Main Street Substation. Prior to construction, site demolition of an existing decommissioned power plant, industrial building and portion of a parking lot would occur. The proposed Silvergate Substation would support four 230 kV circuits and eleven 69 kV circuits. Initially, the new substation would include three 230 kV and seven 69 kV transmission lines, two 69 kV capacitors, two 69 kV grounding transformers, two 230/69 kV transformers and associated control shelter, breakers and relay equipment. At build-out, the Silvergate Substation would include four 230 kV/69 kV transformers, two 69 kV grounding transformers, two 69 kV capacitor banks and associated control shelter, breakers and relay equipment.

Once the construction of the proposed Silvergate Substation is complete, the existing Main Street Substation would be de-energized and all above ground structures removed from the site.

Special Protection System

In order to avoid potential overloads at the South Bay Substation, a Special Protection System is proposed. This system would consist of installation of redundant hardware/logic platforms and communication systems that would detect outages and provide triggers to reduce overloads.

138 kV Line Undergrounding and Lattice Steel Bridge Structure Removal

Upon the completion of the proposed Silvergate Substation project, two of the three 138 kV circuits currently installed in the SDG&E ROW between the South Bay Power Plant Switchyard and Main Street Substation and located on the existing lattice steel bridge structures will be de-energized and removed from operation. The remaining 138 kV circuit is designed to be installed underground between the South Bay Power Plant Switchyard and the Sweetwater River. Once these 138 kV circuits are removed and located underground, then approximately 18 existing lattice steel 138 kV bridge structures will be removed in Chula Vista.

2.2 Project Location

The project components are located in the cities of San Diego and Chula Vista. The new Silvergate Substation would be located across from the existing Main Street Substation at the southwest intersection of Sampson Street and Harbor Drive in the Barrio Logan community of the City of San Diego. The installation of the Special Protection System, undergrounding of the 138 kV transmission cable and removal of lattice steel bridge structures would occur along the Chula Vista Bayfront in the City of Chula Vista. Work associated with the Special Protection System would be conducted at the South Bay Substation. Installation of the underground cable and removal of the lattice steel bridge structures would occur west of and parallel to Interstate 5. A portion of the project would cross the San Diego Bay National Wildlife Refuge Sweetwater Marsh Unit.

2.3 SDG&E's Stated Project Objectives

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

- Upgrade aging and obsolete equipment at Main Street Substation;
- Provide increased substation reliability;
- Provide increased bulk power transmission system reliability;
- Provide expansion capability for load growth and potential generation additions; and
- Work with local governments to achieve long-term land use goals.

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

Environmental Health Coalition (EHC), National City, California

- Separating the work at Silvergate into separate environmental review processes via multiple phases makes it difficult to fully assess the environmental and community impacts.
- The Draft EIR should provide a detailed description of how line undergrounding in and near the San Diego Bay National Wildlife Refuge will be implemented and include appropriate mitigation.
- EHC understands that the 230 kV line would be undergrounded through Barrio Logan, starting at Sicard Street. This is not reflected in the project description.
- The NOP is unclear regarding what the Special Protection System entails. The EIR should include detail about the system and mitigate from the effects on environment and health that could result from this system.

United States Fish and Wildlife Service, Carlsbad, California

- The Draft EIR should provide a detailed description of the undergrounding portion of the project and removal of existing support structures. A map indicating existing lines in proximity to the Refuge should be included in the Draft EIR. A timeline for completing the project from construction to revegetation should be provided to the US Fish & Wildlife Service. Time of year, duration of each activity, and nighttime occurrence should be disclosed.
- Coordination efforts of this project with the OMPPA project should be discussed.

- Possible changes in route maintenance access, location of construction staging areas and stockpile soil and/or pieces of the lattice steel bridge structures should be addressed in the project description.

3.2 Alternatives

State of California, Department of Fish and Game, San Diego, California

- A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. These communities should be fully avoided and protected from project related impacts.

Environmental Health Coalition (EHC), National City, California

- Since demolition of the previous Silvergate buildings is already underway, alternatives to the proposed project are now less feasible. A complete disclosure of decommissioning efforts at 1348 Sampson Street should be provided to the EHC.
- Many alternatives to the project are compatible with one another. EHC recommends that SDG&E analyze the load management and conservation alternatives together. Highest priority should be given to alternatives that can reduce load demand for existing and new generation.
- SDG&E should review the possibility of employing synchronous condenser technology that stabilizes grid voltages, increases service reliability, and maintains transmission capacity.

Goodrich Aeronautics Group, Chula Vista, California

- Alternatives in the EIR should include: alternatives to trenchless methods for the proposed 138 kV line undergrounding between the South Bay Power Plant and Sweetwater River.

3.3 Human Environmental Issues

3.3.1 Public Services and Utilities Issues

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

- The CCDC would like to know what impact the proposed Silvergate Substation will have on the SDG&E Urban Substation, a 69 kV station, located at the southeast corner of 14th Avenue and F Street.

3.3.2 Transportation and Traffic Issues

City of San Diego, Development Services, Land Development Review Division

- The document should discuss and address any project access point, and construction-related traffic impacts.

3.3.3 Land Use Compatibility and Recreation Impact Issues

San Diego Unified Port District, San Diego, California

- The EIR must evaluate potential conflicts of the proposed project with land uses in the CVBMP.
- An overlay map showing the Bayfront Planning Area with the Silvergate Underground Alignment should be included in the EIR to demonstrate the proposed project's location in respect to the CVBMP study area.
- An overlay map should be included in the EIR exhibiting the proposed project's location in relation to other Port Tidelands.
- The EIR should examine how the proposed project would impact Tidelands and Port tenants during construction.
- The EIR should evaluate how the proposed project would affect any past, present, or probably future Port projects in the Cumulative Impacts section.

San Diego Gas & Electric, San Diego, California

- The CPUC should consider the future development of the City's Bayfront and the resulting benefits to Chula Vista residents in the Draft EIR.

3.3.4 Public Health and Safety Issues

Department of Toxic Substances Control, Cypress, California

- The EIR should identify whether current or historic uses at the project site have resulted in a release of hazardous wastes/substances. The EIR should identify known or potential contaminated sites and evaluate if these sites pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. The Department of Toxic Substances provides a list of regulatory agency databases. The Department provides procedural guidelines should sites in the project vicinity be identified as storing or releasing hazardous materials previously.
- Environmental investigations and sampling should be conducted under a Work Plan approved and overseen by an appropriate regulatory agency in addition to being summarized in the document. Proper investigation, sampling and remedial actions, if necessary, should be conducted at the site prior to new development or construction.
- If any property within 2,000 feet of the project site is contaminated with hazardous chemicals, except for a gas station, the project may fall within the “Border Zone of a Contaminated Property” and appropriate precautions should be taken prior to construction.
- If any building structures, asphalt or concrete-paved surface areas or other structures are to be demolished, an investigation should be conducted for the presence of lead-based paints or products, mercury, and asbestos containing materials. If any of these materials are found, precautions should be taken during demolition and contaminants should be remediated.
- Sampling of any excavated soil should be required prior to disposal. If soil is contaminated, it should be properly disposed of rather than relocated. Land disposal regulations may be applicable to these soils. Proper sampling of any import soil should be conducted to ensure soils are free of contamination.
- Human health and the environment of sensitive receptors should be protected during construction and demolition. A study may have to be conducted to determine if there are, has been, or will be any releases of hazardous materials posing a risk to human health or the environment. If hazardous wastes are, or will be, generated by the operations, wastes should be managed in accordance with the California Hazardous Waste Control Law and Hazardous Waste Control Regulations. If soil/groundwater contamination is suspected, construction/demolition should cease and health and safety procedures should be implemented. The EIR should identify required investigation and/or remediation and the government agency providing regulatory oversight.

- If the site was/is used for agricultural, pesticides, herbicides and agricultural chemical residues may be present. Investigation and remedial action should be conducted at the site prior to construction if necessary.

Environmental Health Coalition (EHC), National City, California

- The EHC feels it is unclear when and how subsurface contamination will be cleaned up at both [Main Street and Silvergate] sites. The EIR should provide a detailed plan for cleanup of surface contamination. Potential impacts should be addressed and mitigated.
- Environmental impacts of the project include exposure to contaminated soil by residents, future workers and others if soil cleanup is not planned.
- SDG&E should develop an emergency plan for notifying residents within 1,000 feet in the event of an accidental toxic materials release.

County of San Diego Solid Waste Local Enforcement Agency, San Diego, California

- A portion of the transmission line proposed for undergrounding traverses a known former solid waste disposal site, known as Paradise Marsh burn ash site (SWIS 37-CR-0028). The burn site is generally located south of Paradise Creek, between the power lines and Interstate 5, and north of E Street. Lateral and vertical extent of the burn ash has not been determined and may exist in the subsurface outside of this area. Sampling has indicated that the burn ash area contains elevated concentrations of lead and other heavy metals that could pose a risk to the health of construction workers and the nearby population. During scoping of the EIR, work in and around burn ash needs to be addressed.
- If ash is disturbed during project construction, it should be handled in compliance with state and local requirements. Offsite disposal requires sampling and disposal at an appropriate facility. Per the California Health and Safety Code Section 25157.8(a), soil containing lead concentrations above 350 mg/kg must be disposed of at an approved Class III landfill.

3.4 Cultural Resources Issues

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.

3.5 Natural Environmental Issues

3.5.1 Biological Issues

State of California, Department of Fish and Game, San Diego, California

- The Department of Fish and Game requests that a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats be conducted.
- A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, should be included. The analysis should follow the CEQA Guidelines and include off-site habitat, wildlife/corridor movement discussion. Impacts from both human (increased lighting, noise) and physical (drainage pattern, water volume, quality, velocity, soil erosion, sedimentation) changes should be discussed and mitigation provided where necessary. Conflicts between wildlife-human interactions should be discussed and a cumulative analysis should be developed pursuant to CEQA.
- Mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats should be discussed. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible, off-site mitigation should be addressed. The Department requests that a biological monitor be present during construction and implementation of mitigation monitoring. The Wildlife Agencies recommend that construction activities be scheduled to avoid the bird breeding season (approximately February 15 through August 31). However, the department provides guidelines should construction occur within the bird breeding season. The Department does not support relocation, salvage, and/or transplantation as mitigation for rare, threatened, or endangered species. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. The department provides requirements for these plans. The Wildlife Agencies recommend the use of native plants in landscape areas adjacent to mitigation/open space areas. Exotic plant species should not be used. Areas reserved as mitigation for project impacts should be protected from future direct and indirect impacts. Temporary fencing should be required in all locations of the project where proposed grading or clearing is within 100 feet of proposed biological open space. Permanent fencing should be installed between the impact area and biological spacing.
- The Department has responsibility for wetland and riparian habitats and strongly discourages development in wetlands or conversion of wetlands to uplands. The

Department opposes any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless project mitigation assures there will be “no net loss” of either wetland habitat values or acreage. All wetlands and watercourses should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. The Department requests that if the site has the potential to support aquatic, riparian, or wetland habitat, a jurisdictional delineation of lakes, streams, and associated riparian habitats should be included in the Draft EIR.

- The Department of Fish and Game attached “Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened and Endangered Plants and Natural Communities” to the comment letter. This attachment includes recommendations to help those preparing and reviewing environmental documents to determine when botanical surveys are needed, who should be considered qualified to conduct the surveys, how the surveys should be conducted, and what information should be contained in the survey report.
- The Department of Fish and Game attached to the comment letter “Sensitivity of Top Priority Rare Natural Communities in Southern California.” This attachment shows the sensitivity rankings for rare natural communities in southern California.

United States Fish and Wildlife Service, Carlsbad, California

- Construction activities through the Sweetwater Marsh should not occur during nesting season (February 15 through September 15). If construction cannot be avoided during this time, the Draft EIR should include measures to avoid impacts on nesting birds such as the Federal endangered light-footed clapper rail and State endangered Belding’s savannah sparrow. If monitoring is proposed, territorial monitoring is the most appropriate method.
- The Federal endangered California least tern is known to forage in the tidal channels located within the SDG&E right-of-way extending through the Sweetwater Marsh. The Draft EIR should address potential impacts related to this species as well as others listed in the NOP.
- Mitigation measures should be incorporated into the project to avoid impacts to light-footed clapper rails and Belding’s savannah sparrows that occupy the salt marsh habitat within and adjacent to the project site.
- If night-time construction is proposed, night-lighting should be discussed and mitigated where appropriate.

- The total population of the light-footed clapper rails within the Sweetwater Marsh is limited. A mitigation measure should be included requiring a qualified biologist approved by the CPUC to survey for its presence within disturbance areas immediately prior to grading and brushing. The biologist should be present to monitor areas during disturbance to avoid impacts to rails and activities should be coordinated with the Refuge Manager.
- A maintenance and monitoring program prepared in consultation with the Service should be developed for revegetation areas in proximity to the Refuge.
- Any mitigation measures included in the project to avoid impacts to biological resources should be coordinated with the Refuge Manager of the San Diego Bay NWR for activities occurring in close proximity to the Refuge.

3.5.2 Hydrology and Water Quality Issues

Environmental Health Coalition (EHC), National City, California

- Impacts to groundwater and potential releases into the San Diego Bay should be addressed in the EIR.
- An analysis related to existing standing water at the site resulting from cooling technology should be included in the EIR.

United States Fish and Wildlife Service, Carlsbad, California

- There is a potential for increased sedimentation within the Sweetwater Marsh as a result of project implementation and long-term maintenance to underground lines. Measures to avoid these impacts should be discussed.
- Possible contaminants affecting the Sweetwater Marsh should be addressed and mitigation should be provided for mobilization of soil and water contaminants impacting the adjacent refuge resources.
- The Draft EIR should describe how the proposed undergrounding activity could impact tidal flows within the marsh, particularly between the east and west end of the marsh. If no impacts are anticipated, substantial evidence should justify this finding.

3.6 EIR Administrative and Permitting Comments

Department of Toxic Substances Control, Cypress, California

- If it is determined that hazardous wastes are, or will be, generated and wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. The Department provides contact information to initiate pre-application discussions and permitting processes.
- The Department provides contact information to obtain a United States Environmental Protection Agency Identification Number if hazardous wastes will be generated.
- Hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency.
- If the project includes discharging wastewater to storm drain, a wastewater discharge permit from the Regional Water Quality Control Board may be required.

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.
- The developer is responsible for quantifying environmental impacts of the improvements and implementing mitigation measures. Indirect effects of any mitigation within Caltrans right-of-way must be addressed.

San Diego County Archaeological Society, Inc.

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

State of California, Department of Fish and Game, San Diego, California

- A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the following information is requested:

a) Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA permit; b) A Department-approved Mitigation Agreement and Mitigation Plan are required for plans listed as rare under the Native Plant Protection Act.

- The project may require a Lake or Streambed Alteration Agreement, pursuant to Section 1600 *et seq.* of the Fish and Game Code, with the applicant prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of a river, stream or lake, or use material from a streambed. The issuance of a Lake or Streambed Alteration Agreement is subject to CEQA and may use the project EIR for consideration.

Unified Port of San Diego, Planning Services

- The Port would like to be included in the distribution list of the Draft EIR.

Environmental Health Coalition (EHC), National City, California

- EHC supports undergrounding in Chula Vista and an ongoing dialogue should occur with National City to identify future opportunities for undergrounding. A cost analysis of undergrounding in National City should also occur.

County of San Diego Solid Waste Local Enforcement Agency, San Diego, California

- Excavation or movement of ash with onsite disposal requires a waiver from the Regional Water Quality Control Board's Water Discharge Requirements.
- The Local Enforcement Agency would like to be kept informed regarding the project.

3.7 Project Proponent

San Diego Gas & Electric, San Diego, California

- In the Memorandum of Understanding with SDG&E, the City of Chula Vista identified the objectives of the undergrounding portion of the project. The three conditions precedent to undergrounding included 1) The CPUC's approval of the Otay Mesa Power Purchase Agreement Transmission project, 2) Upgrade of the Main Street Substation, and 3) Chula Vista's designation of the area as a 20A underground district and availability of funds for undergrounding Tie Line 13815.

- If the CPUC requires SDG&E to perform Horizontal Directional Drilling on Goodrich's property, then the cost to the City to underground Tie Line 13815 will substantially increase (approximately double the cost of open trenching).
- If Chula Vista is required to absorb the cost of horizontal directional drilling, other undergrounding projects may not proceed and Chula Vista may need to borrow ahead 5 years of 20A funding which is prohibited by SDG&E. The undergrounding portion of the Silvergate project would thus be delayed until sufficient funds have been accumulated by the City of Chula Vista.

APPENDIX A

NOTIFICATION AND SCOPING MEETING MATERIALS

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Notice of Preparation

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Public Notice

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Organizations and Services)

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Mailing List for Public Notice Only

(Includes Concerned Public and Property Owners within 300 feet
of Project Alignment)

APPENDIX B

SUMMARY OF SCOPING COMMENTS

B-1

**September 12, 2005, 2:00-4:00 PM Scoping
Meeting Sign-In Sheet and Completed Speaker
Registration Cards**

B-2

**September 12, 2005, 6:00-8:00 PM Scoping
Meeting Sign-In Sheet and Completed Speaker
Registration Cards**

B-3

**Summary of Oral Comments Received
at Scoping Meetings**

MEETING NOTES

California Public Utilities Commission (CPUC) San Diego Gas & Electric (SDG&E) Silvergate Transmission Substation Project

Environmental Impact Report (EIR) Public Scoping Meetings September 12, 2005

Public Comments, September 12, 2005

Chula Vista Civic Center Library, 2 PM – 4 PM

- Alternatives in the EIR should include: alternatives to trenchless methods for the proposed 138 kV line undergrounding between the South Bay Power Plant and Sweetwater River.
- Potential effects to the Port of San Diego Chula Vista Bayfront Master Plan and Port tidelands need to be addressed in the EIR.

Public Comments, September 12, 2005

San Diego Central Library, 6 PM – 8 PM

No comments were received.

APPENDIX C

**LETTERS RECEIVED IN RESPONSE
TO THE NOTICE OF PREPARATION**

C-1

**Letters from Federal Agencies, State Agencies,
Local Agencies and Planning Groups, and
Native American Groups**

C-2

Letters from Private Organizations

C-3

Written Comments from Private Citizens