

PUBLIC UTILITIES COMMISSION

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August 16, 2006

Mr. Kevin O'Beirne
Regulatory Affairs
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123

**Re: Application Completeness Review - Sunrise Powerlink Project Proponent's
Environmental Assessment -- Application Nos. A.06-08-010 / A.05-12-014**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division has conducted its completeness review of San Diego Gas and Electric's (SDG&E) Sunrise Powerlink Project Applications for Public Convenience and Necessity (CPCN) (A.06-08-010 and A.05-12-014) and Proponent's Environmental Assessment (PEA) filed on August 4, 2006 with CPUC's Docket Office.

The Energy Division uses the CPUC's Information and Criteria List as its basis in evaluating the completeness of the PEA and ensuring that sufficient information has been provided for the CPUC to complete its environmental analysis for the project as required by CEQA. Section 15100 of the California Environmental Quality Act (CEQA) Guidelines provides the lead agency 30 days to assess the completeness of the project proponent's application. However, in an ongoing effort to streamline the CPUC's review process, this review has been completed in less than eight business days.

As part of an effort to streamline the review of the PEA, during May, June, and July 2006 SDG&E submitted portions of the PEA to the CPUC for preliminary review. The CPUC's EIR/EIS Team reviewed all documents received, and provided detailed comments in a series of seven letters to SDG&E between May 22 and July 21, 2006. The final PEA, submitted on August 4, 2006, incorporated most of the changes requested by the CPUC's EIR/EIS Team. However, certain critical information items that were clearly presented to SDG&E as being required for completeness were not provided to the Energy Division. In addition, the PEA included several new sections that had not been provided to the CPUC's EIR/EIS Team for review (the most important being the section on Biological Resources).

With regard to the Project Description, the Administrative Draft PEA comments focused primarily on the overall structure and format of the Project Description. The CPUC suggested that the alternatives discussion and impact analysis should not be located in the Project Description. As a result, the Project Description section has been substantially revised, requiring a new round of careful review by the CPUC's EIR/EIS Team. New completeness comments have been developed based on specific details needed for analysis of the Proposed Project.

After completing our review of SDG&E's Application and PEA for the Project, the Energy Division concludes that the PEA is incomplete. Attachment A presents the specific CPUC rules and regulations applicable to completeness review and defines which items were found to be

incomplete. Attachment B is the completeness review list, which identifies the issue areas that were found incomplete, and the additional information required to conduct our environmental analysis for this project.

The CPUC's EIR/EIS Team has identified several items initially identified as being required (during Administrative Draft PEA review) that can be efficiently completed by the CPUC's EIR/EIS Team. Therefore, these requests are not presented again to SDG&E; however, those items are defined in Attachment C and will be completed by the CPUC's EIR/EIS Team.

The requested information should be filed as supplements to the above application. One set of responses should be sent to the Energy Division and one to our consultant Aspen Environmental Group in both hardcopy and electronic format.

Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items. At any point in this process, the CPUC reserves the right to ask for additional information in the form of data requests. Any questions on the completeness review should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP
PURA V
Project Manager for Sunrise Powerlink
Energy Division CEQA Unit

cc: Ken Lewis, CPUC Energy Division
Nicholas Sher, CPUC Legal Division
Lynda Kastoll, BLM Co-Lead
Jill Larson, SDG&E Attorney
Susan Lee, Aspen Project Manager

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
I. General Application Requirements (from CPUC ICL Section I) [Verified by Docket Office]				
Form and Size	Rule 2	Docket Office	Yes	Checked by Docket Office
Title and Docket Number	Rule 3 per ICL (Rule 2.1 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Signatures	Rule 4 per ICL (Rule 2.2 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Verification	Rules 5 & 6 per ICL (Rule 2.4 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Copies	Rule 7 per ICL (Rule 2.5 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Contents	Rule 15	Docket Office	Yes	Checked by Docket Office
Articles of Incorporation	Rule 16	Docket Office	Yes	Checked by Docket Office
Financial Statement	Rule 17	Docket Office	Yes	Checked by Docket Office
II. Applications for CPCN (from CPUC ICL Section II)				
Construction Or Extension of Utility Facilities	Rule 18	CPUC Energy Division/ Aspen	No	Please refer to specific comments in Attachment B.
Exercise of Franchise Rights	Rule 19	N/A	N/A	Rule 19 or like section on exercise of franchise right not included under Rules of Practice and Procedures
Exercise of Franchise Rights Not Yet Granted	Rule 20	N/A	N/A	Rule 20 or like section on exercise of franchise right not yet granted not included under Rules of Practice and Procedures

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
Common Carrier Certificates	Rule 21	N/A	N/A	Does not apply to Proposed Project
Warehouses	Rule 22	N/A	N/A	Rule 22 or like section on warehouses not included under Rules of Practice and Procedures
Environmental Information Requirements: CPUC ICL Section V				
4. Significance				
In evaluating significance both primary or direct and secondary or indirect effects shall be considered . Primary effects are those immediately related to the project. Secondary effects are consequences associated more closely with the primary effects than to the project itself. New suburban growth may be a primary effect of an electric transmission line extension for example, whereas possible effects, such as traffic congestion and consequent air pollution, would be secondary effects.	CPUC ICL Section V.4	CPUC Energy Division/ Aspen	No	Certain effects of the project are not clearly defined. Please refer to Attachment B.
5. Incorporation by Reference				
The PEA may incorporate material by reference when to do so would reduce bulk without impeding agency or public review. Any such incorporation shall, however, include a summary of the matter to which reference is made and an explanation of its relevance to the project. No material may be incorporated by reference unless it is reasonably available, or is made reasonably available for inspection by the Commission and potentially interested members of the public.	CPUC ICL Section V.5	CPUC Energy Division/ Aspen	No	A copy of the "Transmission Comparison Study (TCS)" (p. 2-3) completed by SDG&E must be made available to the environmental team.
7. Format for PEA				
Cover Sheet	CPUC ICL Section V.7	CPUC Energy Division/ Aspen	Yes	Included in PEA
Table of Contents			Yes	Included in PEA
PEA Summary			Yes	Included in PEA
Project Purpose and Need			Yes	Included in PEA
Project Description			Yes	Included in PEA
Environmental Setting			Yes	Included in PEA
Environmental Impact Assessment Summary			Yes	Included in PEA
Detailed Discussion of Significant Impacts			Yes	Included in PEA
Appendices (if any)			Yes	Included in PEA

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
8. Cover Sheet				
<p>The cover sheet shall consist of a single sheet containing:</p> <ul style="list-style-type: none"> • the title "Proponent's Environmental Assessment," • the caption of the proceeding for which the PEA has been prepared, • the docket number of the proceeding, and • the name, address, and telephone number of the project proponent. 	CPUC ICL Section V.8	CPUC Energy Division/ Aspen	Yes	None
9. PEA Summary				
<p>Each PEA shall contain a summary, which shall briefly state the major conclusions, areas of controversy, and major issues, which must be resolved (including the choice among reasonably feasible alternatives and mitigation measures, if any). The summary should normally be two to ten pages in length, but may be shorter or longer depending upon the complexity of the project and the number and significance of the project's impacts.</p>	CPUC ICL Section V.9	CPUC Energy Division/ Aspen	Yes	A summary is provided.
10. Project Purpose and Need				
<p>All PEAs shall contain an explanation of the objective or objectives of the project. This shall be accompanied by an analysis of the reason why attainment of these objectives is necessary or desirable. The analysis should normally not exceed a page or two in length except where significant or potentially significant project impacts have been identified in the Environmental Impact Assessment Summary required by Section V, 13. Where such impacts have been identified, the analysis of project purpose and need must be sufficiently detailed to permit the Commission to independently evaluate the project need and benefits in order to accurately consider them in light of the potential environmental costs. This requirement may be satisfied by reference to specific portions of the project application, which address this issue.</p>	CPUC ICL Section V.10	CPUC Energy Division/ Aspen	Yes	SDG&E's objectives are defined.
11. Project Description				
<p>The description of the project shall contain the following information, but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.</p> <p>(a) The precise location and boundaries of the project shall be shown on a detailed map, preferably topographic. The location shall also be shown on a regional map.</p> <p>(b) A general description of the project's technical, economic, and environmental characteristics considering the principal engineering proposals and supporting public service facilities.</p> <p>The requirements of this section may be satisfied by reference to specific portions of the project application, which address these issues and include this information.</p>	CPUC ICL Section V.11	CPUC Energy Division/ Aspen	No	Please refer to comments on the Project Description in Attachment B for deficiency comments.

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
12. Environmental Setting				
<p>The PEA must include a description of the environment in the vicinity of the project and within the potential range of impact as it exists before commencement of the project. Both local (site-specific) and regional perspectives must be provided. The description should include some discussion of the topography, land use patterns, and general biological environment. Detailed descriptions should be limited to those elements of the environment, which may be subject to a potentially significant impact. The setting must, however, be sufficiently described to permit an independent evaluation by the Commission of elements, which could be impacted by the project.</p> <p>All elements of the environmental setting necessary to fully understand impacts identified as significant or potentially significant in the Environmental Impact Assessment Summary required by Section V, 13 shall be described in detail.</p>	CPUC ICL Section V.12	CPUC Energy Division/ Aspen	No	Please refer to specific comments by discipline in Attachment B.
13. Environmental Impact Assessment Summary				
<p>Every PEA shall contain an Environmental Impact Assessment Summary in the form attached [CEQA Initial Study Checklist]. This summary shall be employed as an aid in determining the scope and detail of the environmental setting and impact analyses. All impacts identified as significant or potentially significant must be explained in detail in accordance with the criteria stated in Section V, 14. All elements of the environmental setting necessary to fully understand such impacts shall be described in detail in accord with Section V, 12. All other answers provided on the form should be briefly explained in the space provided or on additional sheets attached to the Summary as necessary. These brief explanations should contain no detailed studies, research, or analysis.</p> <p>Each enumerated question shall be answered "yes," "no," "potential," or "unknown" in column 1 labeled "IMPACT" to indicate whether the project involved will result either directly or indirectly in any impact of the type identified. If it is felt that there will or may be an impact of the type listed, an attempt to quantify the impact must be made by the proponent and indicated in column 2 labeled "SIGNIFICANCE." If it can be seen with certainty that the impact or potential impact will be significant, the answer "significant" shall be given. If the impact or potential impact is difficult to quantify but a substantial body of opinion can be expected to consider the impact to be significant, the answer "potentially significant" shall be given. If despite good faith efforts the proponent is unable to provide any reasonable estimate of the significance of the impact the answer "unquantified" shall be given. If it can be seen with certainty that the impact or potential impact under consideration will not be significant, the answer "insignificant" shall be given.</p>	CPUC ICL Section V.13	CPUC Energy Division/ Aspen	No	The checklist is not included.

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
14. Detailed Discussion of Significant Impacts				
<p>The PEA shall include a detailed discussion of all project impacts and potential impacts of significance. The cumulative effect of the project's impacts shall also be discussed in detail where such cumulative effect is significant. Impacts should be discussed in the order of importance or significance. Any data and analyses shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or incorporated by reference in accord with Section V, 5. Distinctions between factual findings and assumptions or subjective judgments should be made clear.</p> <p>In addition to the analyses of individual project impacts, the PEA for all projects which may have a significant effect on the environment shall address the following:</p>	CPUC ICL Section V.14	CPUC Energy Division/ Aspen	No	Please refer to specific comments by discipline in Attachment B.
<p>(a) Mitigation Measures Proposed to Minimize the Significant Effects. Describe significant, avoidable, adverse impacts, including inefficient and unnecessary consumption of energy, and measures to minimize these impacts. The discussion of mitigation measures shall distinguish between the measures, which are proposed by project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce adverse impacts. This discussion shall include an identification of the acceptable levels to which such impacts will be reduced, and the basis upon, which such levels were identified. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.</p>	CPUC ICL Section V.14a	CPUC Energy Division/ Aspen	No	Please refer to specific comments on mitigation measures (Applicant Proposed Mitigation) in Attachment B.
<p>(b) Alternatives to the Proposed Action. Describe all reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and why they are rejected in favor of the ultimate choice. The specific alternative of "no project" must also always be evaluated, along with the impact. The discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly.</p>	CPUC ICL Section V.14b	CPUC Energy Division/ Aspen	No	Please refer to specific comments on Alternatives in Attachment B.

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(c) The Growth-Inducing Impact of the Proposed Action. Discuss the ways in which the proposed project could foster economic or population growth, either directly or indirectly, in the surrounding environment. Included are projects, which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristics of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.	CPUC ICL Section V.14c	CPUC Energy Division/ Aspen	Yes	Discussed in Chapter 10 (Growth-Inducing Effects)
(d) Organizations and Persons Consulted. The PEA shall include a list of persons, and their qualifications, responsible for compiling the detailed information for each area of environmental concern, and a discussion of the methods used to produce such information.	CPUC ICL Section V.14d	CPUC Energy Division/ Aspen	Yes	PEA Chapter 14 includes a List of Preparers
15. Affected Property Owners				
The names and mailing addresses of all owners of land over, under or on which the project, or any part of the project, may be located, and owners of land adjacent thereto, shall be listed in an appendix to the PEA.	CPUC ICL Section V.15	CPUC Energy Division/ Aspen	No	A mailing list for owners within 300 feet was provided to the EIR/EIS Team but was not included in the PEA.
PEA Requirements (from GO 131-D)				
(a) A detailed description of the proposed transmission facilities, including the proposed transmission line route and alternative routes, if any; proposed transmission equipment; such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc.; and a proposed schedule for certification, construction, and commencement of operation of the facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Please refer to comments on Project Description in Attachment B.
(b) A map of suitable scale of the proposed routing showing details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	The PEA includes general maps of the items listed, and detailed maps for EIR/EIS analysis (Map Books) are expected to be received separately. Items to be included on these maps are defined in Attachment B.
(c) A statement of facts and reasons why the public convenience and necessity require the construction and operation of the proposed transmission facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	PEA Chapters 1 and 2 describe SDG&E's position on the need for the project.

Attachment A – Table of Completeness Status

Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(d) A detailed statement of the estimated cost of the proposed facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	Cost of the proposed facilities is not a CEQA issue. Cost estimates were provided in the CPCN Application.
(e) Reasons for adoption of the route selected, including comparison with alternative routes, including the advantages and disadvantages of each.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Chapter 3 and the Routing Study (PEA Appendix B) describe SDG&E's process for assessment of alternatives. A few questions remain and are detailed in Attachment B.
(f) A schedule showing the program of right-of-way acquisition and construction.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	PEA Section 2.9 includes the Project Schedule.
(g) A listing of the governmental agencies with which proposed route reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	Letters to Native American tribes are provided in PEA Appendix D. Other consultation is described in the Routing Study.
(h) A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rule of Practice and Procedure, Rules 17.1 and 17.3. If a PEA is filed, it may include the data described in Items (a) through (g) above.	GO 131-D Section IX. A.		Yes	The PEA was filed with the CPCN Application. Specific deficiency comments on the PEA are discussed in this table and in Attachment B.
Potential Exposure To Electric And Magnetic Fields (EMF)				
Applications for a CPCN shall describe the measures taken or proposed by the utility to reduce the potential exposure to electric and magnetic fields generated by the proposed facilities, in compliance with Commission order. This information may be included in the PEA required by Rules of Practice and Procedure 17.1.	GO 131-D Section X. A.	CPUC Energy Division/ Aspen	Yes	Appendix G to the PEA includes the EMF Field Management Plan. Data requests may be required for clarification of this information.

Sunrise Powerlink – Details of Completeness Review

Prev? Completeness Requirements

Project Description

- ✘ 1. The Project Background identifies several studies without citations or groups whose work is not widely known. A copy of the "Transmission Comparison Study (TCS)" (p. 2-3) completed by SDG&E must be made available to the environmental team.
- 2. Items that are required and may be included in Map Books (and are required separately, if not in Map Books):
 - a. Map(s) that show the locations and dimensions of ancillary facilities including laydown, pulling stations, staging, storage yards, and fly yards.
 - b. Map(s) that show proposed access roads and other areas of land and vegetation disturbance including any anticipated trees to be removed. Clearly mark temporary versus permanent disturbance areas.
 - c. Map(s) that indicate precisely where the overhead lines would transition to underground (and vice versa) and where transition structures would be located.
 - d. Map(s) showing sensitive land uses (by name not legend symbol which are nearly unreadable) including the numerous open spaces and preserves.
 - e. Map(s) that show the location of both proposed towers and existing towers/poles that would be affected (added and removed, or consolidated) as a result of the Proposed Project. Should also include a corresponding key identifying proposed tower type/design and a corresponding table listing existing and proposed structure heights and conductor span distances. [Note: this is important because a number of Greystone's simulations do not look like they are assuming realistic span distances for 500kV/230kV towers]. Structure locations are also important since they are planning to clear 100' x 100' areas around each structure. Note: We realize that Table 2.3-1 contains structure types [except that sometimes the entry says lattice/steel pole] with median span distances and average tower heights. If necessary, we could use the median and average information.
 - f. Provide a map of the work that will be completed between Sycamore Substation and Elliott Substation. Which poles would be removed? Which access roads would need improvements?
 - g. Existing 69 or 230 kV lines in or near corridor; notation regarding whether they would be retained or removed with Proposed Project.
 - h. Description needs to be clear as to whether each component of the Proposed Project is in new (undisturbed) or existing (SDG&E) corridor.
 - i. Identify which specific towers would require helicopter construction.
- 3. (Relates to Project Description and Alternatives) Follow-up discussion to SDG&E Conference Call of 8/11/06). Clarification is required as to where (or whether) the Proposed Project would stay within the 100' ROW within ABDSP or whether a 150 foot ROW is required. Would the Proposed Project be within any State Wilderness? SDG&E is meeting with State Parks and ABDSP officials the last week of August 2006.
- 4. Please provide a summary of why each of the other system upgrades is needed.
- 5. For all drainages crossed in the underground segments, the project description must define the construction technique for crossing the drainage (trenched, bored, or directionally drilled).
- 6. All tables listed in Section 2 should be numbered and referenced in the text. This should be corrected so that there is no confusion between data and the discussion in the text.

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7. Page 2-13 (The Sunrise Project Provides Other Benefits). Please include missing text associated with key point #4.
8. Page 2-15 (Recent Efforts to Accomplish SDG&E's Renewable Goals). The text talks about SDG&E signing 5 contracts with renewable projects. However, the text only talks about Stirling Energy Systems (SES) and Truckhaven Geothermal projects. Please provide information on the other 3 projects.
9. The second bullet under project objectives (Section 2.2.4) describes the need for system expandability to meet both anticipated short-term (2010) and long-term (2015 and beyond) load growth in San Diego. Does SDG&E have plans to add additional circuits along the proposed Sunrise Powerlink Transmission ROW in the future?
10. In the first table under Section 2.3.2, please add the number of structures that will be installed per segment. It would also be helpful to include a map or table that defines the existing ROW widths through the ABDSP.
11. Section 2.3.3.1: Please clarify the relationship between the 69kV and 230 kV circuits. The paragraph is confusing.
- ✘ 12. Figures 2.3-3C through 3E provide section diagrams of Central East Substation. However, there are no height dimensions or elevations provided with the section diagrams and there is no plan diagram of the substation showing where these facilities would be located. The diagrams as presented are practically unreadable and should be submitted in a larger, more readable format along with plan drawings.
13. In Table 2.3-1 under Coastal Link – N28-N29-N56-N72A-N72B-N33B-N34 Proposed Project for Nodes N72B-N33B, the structure type is listed as Single Circuit 230 kV Steel Poles. There is no diagram for this type of pole type (although there is a diagram for the 230 kV Steel Cable Pole); please confirm structure type and provide drawing, if missing.
14. From Sycamore Canyon Substation to Elliott Substation, Table 2.3-1 identifies 84 Single Wood Poles but there is no diagram for single wood poles other than the 69 kV Single Circuit Wood Cable Pole. A diagram is required for this pole type.
15. Provide a description of night lighting requirements and controls for both construction and operation.
16. Provide illustrations showing the difference between existing porcelain insulators and proposed polymer insulators.
17. Please provide support for the following statement found on Page 2-6 of the PEA: "Importantly, the Sunrise Project will meet the CAISO's local area reliability requirement at a cost/benefit ratio that far exceeds other conventional in-area generation alternatives."
18. Please provide an overlay of the Sunrise Project's proposed route with the locations of renewable resource areas in east San Diego County and Imperial County. Please include a table presenting an estimate of the potential generation, by type (geothermal, solar, wind, etc.) for each location.
19. Please provide the expected cost of the renewable energy (by type) and of the "low cost/economic" energy which will be imported over the Sunrise Project as well as the expected cost of local generation.
20. Please explain the implications on the pre and post-project SIL and NSIL if the transmission element analyzed under the G-1/N-1 outage is the Imperial Valley substation.
21. In response to an earlier question about undergrounding the 230 kV circuits the PEA now explains in the underground description portion that the 230 kV line is bundled. Presumably the overhead portion of the 230 kV line is also bundled; please confirm and explain if this is the case for the double-circuit portion only or also for the single-circuit portion.

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Alternatives

- ✘ 1. The discussion for Segments B, C, and D should be presented more thoroughly. The segments clearly would involve regulatory challenges and perhaps greater overall impacts. However, it is not clear if these challenges or impacts could be avoided with minor routing adjustments. Please be sure to identify whether SDG&E believes there is any viable route that could avoid the regulatory obstacles and significant habitats while also avoiding ABDSP in a south-to-north alignment to Sycamore Canyon or the Central Substation Interconnection Area. Additionally, the discussion should clearly state whether a viable alternative 500/230 kV substation location exists along any of the north-south alignments. [Should we request this again or should the EIR/EIS Team just continue its research?]
- ✘ 2. The description of the Northern Borrego Springs alternative should be more detailed. It is our understanding, based our May 30th meeting, that the Northern Borrego Springs alternative would be beneficial because it would: 1.) eliminate 69 kV & 92 kV transmission lines; 2.) eliminate the 69 kV & 92 kV lines; 3.) increase reliability into Borrego Springs; 4.) reduce the miles of transmission line in ABDSP. This needs to be clearly stated by SDG&E.
- ✘ 3. For the 230 kV CFE alternative, under the heading "Does the alternative result in an overall net reduction of potential environmental effects..." it is stated that the alternative "does not reduce significant impacts associated with the Proposed Project." However, there is no justification for this statement. Please explain what environmental effects would occur for this alternative. A similar statement is made in the last sentence on this page ("... and would likely not result in a net reduction in impacts as compared to the Proposed Project") and is also unsupported. Because impacts in ABDSP and other new transmission corridors in San Diego County could be avoided with this alternative, it is important to document these impacts in Mexico and justify the statement that they would be greater than those of the Proposed Project.
- ✘ 4. Regarding the 230 kV CFE alternative, under the heading "Is the Alternative feasible..." it is stated that several regulatory issues make the 230 kV CFE alternative "infeasible," but none of the four issues listed seem insurmountable. These issues would require time to address and a different permitting and regulatory approach, but the connection between the issues and "infeasibility" is not made.
- ✘ 5. Section 3.3.3.8 - The description of the Four 230 kV Lines alternative (Section 3.3.2.5) identifies partial undergrounding as an option. Please address a phased approach to this alternative. Phased expansion of an underground 230 kV system that allows an initial double-circuit 230 kV to grow to eventually four circuits may be cost-effective with minimal incremental environmental impact. Installing four 230 kV circuits gradually over many years could allow incremental expansion as needed to procure Imperial Valley resources as future renewable contracts (e.g., for geothermal power) are established.

Biological Resources

- 1. No graphics were provided with the PEA biology information (Note: the biology-base Map Book is expected the week of August 14). Detailed acreage calculations were provided in the PEA tables that are presumably based on overlay of biology information with impact footprints.
 - a. We need to be provided with maps showing existing resources that were mapped as part of the field efforts.
 - b. We also need to be provided with the vegetation maps and the assumed project impact footprints for temporary and permanent impacts for the entire alignment.
 - c. The maps for the alternative alignments should also be provided.
- 2. The PEA should include at least some general biology maps (using the standard 11x17 inch "Link maps" that cover the entire alignment) showing vegetation, known location of listed species, and critical habitat designations.

Prev? **Completeness Requirements**

3. The PEA should provide a detailed explanation of factors used to calculate land disturbance impacts for each component of the project (i.e., construction drawings as of a certain date).
4. Provide the names and qualifications of the biology surveyors and the dates and times that biologists completed the survey work.
5. The PEA should provide a summary table for each link that includes the following information for each vegetation community:
 - Temporary impacts (acres)
 - Permanent impacts (acres)
 - Proposed mitigation ratio
 - Proposed mitigation (acres).

This should be provided based on the nodes, and added to provide totals for each vegetation community in that link. Based on some quick math by looking at the vegetation tables, the proposed mitigation for temporary and permanent impacts in the Desert Link alone is about 638 acres.

6. The PEA should provide details on where the mitigation noted in #5 above will be provided. The PEA should also provide details on the long-term management of the mitigation areas. We do not think it is adequate to just say that "mitigation will be provided" when such large acreage is affected. Note that the CDFG and USFWS prefer that the mitigation be the same habitat as the impacted habitat. Regional mitigation sites relative to the impact areas may be required. The BLM may have areas of preferred mitigation locations for the desert link.
7. The PEA notes the following with regard to mitigation of impacts to vegetation communities:
 - a. Permanent impacts would be mitigated at a 2:1 ratio inside a preserve, and at a 1:1 ratio outside a preserve. If a node to node segment partially or completely traverses a preserve, mitigation for all permanent impact within that segment were calculated at a 2:1 ratio. The mitigation ratio for each segment is present in the table under Impact BIO-1 for each segment. (Page 5.2-10)
 - b. Communities considered sensitive would be mitigated at a 1:1 ratio for temporary impacts and a 2:1 ratio for permanent impacts. Mitigation would occur on-site for temporary impacts and permanent impacts. (Page 5.2-1)
 - c. A review of APM-01 seems to suggest that mitigation at the above ratios for impacts sensitive habitats would only occur when potential impacts to certain sensitive species are involved and only after consultation with the USFWS and CDFG. APM-01 and APM-19 mention restoration but do not explain how it would be implemented. Clarification on mitigation for impacts to sensitive habitats with and without sensitive species is needed. Also, more detail on restoration mitigation is needed. The wildlife agencies have requested that habitat restoration plans be provided, and that maintenance and monitoring extend for five years after installation.
8. The PEA should present the rationale for all proposed mitigation ratios. Also, the PEA should define what is considered a preserve. When the 2:1 mitigation ratio is used because part or all of the node segment is located in a preserve, the text or table should identify which preserve is affected. The PEA should explain why the ratios don't vary according to habitat type (as is typically used on projects) as opposed to the inside and outside preserve designation used in the PEA.
9. Section 4.2.2.5.5 Other Avian Species includes a section on mammals that I believe should be moved to Section 4.2.2.5.4 Terrestrial Species. This appears to be a typographical error.

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10. The following very important sentence in the fourth paragraph on Page 4.2-59 appears to be missing a middle phrase: "Because the Sunrise Powerlink extends more than 30 miles outside of the SDG&E service territory, but it would be evaluated in part by the standards set forth in the NCCP." The PEA should correct this sentence. Given that this is a new project with substantial acres of impact, and it is located more than 30 miles outside the SDG&E Service area, it is our understanding that impacts to listed species would not be covered by the NCCP.
11. It is noted that the Applicant proposes APMs that may be very similar to the protocols in the NCCP, and that the resource agencies may agree to follow similar procedures as outlined in the NCCP for consultation on impact issues. However, the NCCP cannot be used to provide coverage for listed species.
12. It would be very helpful if the "Summary of Impacts, APMs, and Mitigation Measures" for each Link (located at the end of each link chapter) could be expanded to include the following information:
 - Permanent and temporary impacts to vegetation communities (acreages)
 - Potential impacts to sensitive species habitat (acreages)
 - Short bullets of what the impacts are under each category (i.e., under BIO-1, BIO-2, etc.)
13. The PEA needs to be expanded to include a species-by-species account of the key species. For example, Peninsular Bighorn Sheep does have an impact category that is evaluated for some of the node segments. In all cases, the PEA analysis determined that impacts to this species are not considered significant. This species is one of the most important in terms of potential impact. The PEA should provide justification for the finding of no significance. There are known records of occurrences for this species that should be analyzed as part of this determination. There are also experts on this species within the wildlife agencies that should be consulted. It is not evident in the PEA if any information like this was used to make this determination. The PEA does include analysis of impacts to this species for certain sections, and in at least one case, mitigation is recommended. It would be helpful to have a big picture discussion on this species in terms of the location of the alignment relative to the known populations, potential effect on this species from future maintenance and other activities from access provided by the access road, etc.
14. The species by species account for key species should include the following: common and scientific name, listing and sensitivity status, habitat requirements, range, observed within PSA or not, known occurrences, potential to occur.
15. Potential impacts to Golden Eagle, a highly sensitive species in this region, should be discussed. A discussion of potential impacts to Bald Eagle was discussed in at least one section. It would be helpful to have a summary of the overall project effects to this species.
16. In Table 4.2-2, the unarmored threespine stickleback is shown to have moderate potential occur in the analysis area in San Diego County near the intersection of SR S2 and SR 78, however there are no node segments shown to possible having habitat for this species in the table. The potential for impacts to the watershed upstream from known or potential locations for this and other species, such as the desert pupfish, should be identified in the PEA.
17. The wildlife agencies indicated at the August 9 meeting that protocol surveys may be necessary for western yellow-billed cuckoo. This species is known from the Scissors Crossing area. The PEA should address this issue and either agree that surveys should be provided, or provide justification for why they are not necessary.
18. The PEA should provide justification for the lack of any discussion of desert tortoise and its potential to occur within the PSA.

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19. The PEA should discuss critical habitat designations for all appropriate species and analyze impacts to critical habitat.
20. The PEA needs to discuss the potential for the project to result in impacts to biological resources as a result of the potential for increased vehicular activity along the access roads and potential disturbance of adjacent areas.
21. It is our understanding that there is a large Swainson's hawk migration through ABDSP each year. Jim Dice at ABDSP may have information on this species, and it should be presented in the PEA.
22. Identify individual trees to be removed during construction if they are protected by local ordinances.

Cultural Resources

- ✘ 1. A 1:24K scale map and ESRI GIS shape files for the resources identified in the records search and survey is required, along with a copy of the records search results including site records. The map should include all relocated and newly recorded sites and isolates within the 300' wide study area.
2. As the survey work is on-going, we request a phased schedule for completion of the survey work, with dates provided for completion of specific segments and submittal of new site records and shape files depicting both new site locations and newly surveyed areas.
3. Provide GIS shape-files including all known (previously recorded, updated, and newly recorded) cultural resources locations and engineering plans (this might be provided in Map Books but we have not yet seen them).
- ✘ 4. Please describe the proposed plan for recording and evaluating historic standing structures in the work plan and environmental assessment for cultural resources. It is not clear if a search of historic properties that do not have site records (e.g., a GeoFinder search at SCIC) has been undertaken. It is also not clear what the methodology/approach for identifying and recording historic period structures during the field survey is.

Geology

- ✘ 1. Section 4.7.2.4 does not provide discussion of the differing seismic settings of the areas the alignment crosses. The seismic setting in the Salton Sea area, which includes the Brawley Seismic Zone and large significant active faults of the San Andreas Fault Zone, is significantly different than the setting in the Peninsula Ranges and in the coastal San Diego area that only have a few active faults. A discussion of historic seismicity should also be included.

Land Use

1. Table 4.1-1 should distinguish between jurisdictions and be identified by segments (inter-nodes) so that readers can discern what conditions are found in any particular segment of the project. The section provides some of this in a very generalized fashion, but has no specificity with regard to amounts (acres, linear feet, etc.) of each land use type traversed or adjacent to the ROW. Acreage impacted provided in tables in Sections 5.1 – 8.1, but acreage present within or adjacent to the corridor is not stated.
2. Page 5.1-16, paragraph 3. PEA notes that State Park GIS mapping of wilderness was not accurate and that SDG&E would work with the Park to make corrections. We understand that the PEA may not include accurate information; please confirm that the correct information has been provided in tables, figures, and GIS data.
3. Mitigation ratios of 2:1 for wilderness land and 1:1 for non designated wilderness lands are presented and used in calculations of acreage. Have these ratios be accepted by the relevant agency with jurisdiction?

Noise

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- ✘ 1. Proposed substation modifications must be described with the following additional information: What noise would be generated by the new equipment as compared with existing equipment?
- 2. Noise monitoring locations are not clear on PEA Figures; need detailed maps and text descriptions. Locations are not clearly labeled and cross-referenced between text, figures, and tables. For example, location shown in Figure 4.4-1A as D5 and described in Section 4.4.2.3.1, but label of D5 should be identified in text and table. The figures (such as 4.4-1C) identify locations, but the map labels do not correspond with any information in Table 4.4-2 or Section 4.4.2.3.1.
- 3. The PEA should include impact analysis regarding blasting (noise and vibration impacts, or information on blasting that would allow the EIR/EIS Team to perform such analysis.

Public Health and Safety/Hazardous Materials

- 1. This section adequately addresses potential environmental contamination along the proposed and alternative transmission ROWs from known hazardous material sites based on environmental database searches conducted by EDR. However, the discussion does not specify whether sites of concern identified from the database are within the alignment ROWs or specify an approximate distance from the ROW for these sites. Please provide a copy (preferably electronic) of the EDR databases and maps. Also provide any site-specific information obtained for sites in the EDR database that were found to be near the alignments.
- 2. The setting section does not discuss potential contamination at new substation sites nor does it discuss potential or known environmental contamination at existing substation sites. Additionally, the section does not discuss issues related to current and future hazardous material use at the existing substation sites. Discuss possible contaminants used at substation sites and the presence of any known contamination at all sites where project work will be done.
- 3. A discussion of environmental contamination issues related to potential and existing contamination and hazardous material use and storage practices should be added to each segment section for the corresponding substation locations.

Socioeconomics & Public Services

- ✘ 1. Where would skilled workers for project construction most likely come from (i.e., where do they live)?
- ✘ 2. Describe service interruptions required for 69 kV lines during construction of Proposed Project.

Items to be Completed by EIR/EIS Team

Air Quality

- Project emissions should also be totaled on a 12-month basis in order to determine applicability of federal General Conformity Rule.

Paleontology

- Record searches for paleontological resources are necessary for EIR/EIS impact analysis.
- The discussions in Sections 4.7.2.8.1 through 4.7.2.8.4 (Desert Link to Coastal Link) need additional detail. Significant paleontological specimens should be described to a lower taxonomic level unless this information is unknown. In general, specimens from Class Mammalia (Reptilia, Aves, etc) would not be considered significant if this was the lowest level they were able to be identified to. Results from the record searches and other pertinent geologic literature should be expanded upon in these sections to give meaningful results on the expected paleontology of the area. If genera are referred to in the text (as in the Palm Springs Formation section), they should be italicized as is protocol in standard taxonomic nomenclature.
- Additional information on the sensitivity levels of each unit present also needs to be reported in this section. All of the geologic units present in the project area have assigned sensitivity levels as described in "Paleontological Resources of San Diego County" (Demere and Walsh, 1993). Since results from only one museum located in northern California (see comment #1 above) were included in the administrative draft setting, several geologic units with moderate to high sensitivity in San Diego/Imperial County areas were not reported in the results
- Two additional columns should be added to Table 4.7-2: (1) paleontological sensitivity, and (2) fossils potentially present.

Socioeconomics

- 2000 Census data was used for "Median Household Income" and "Poverty Levels." Is newer information available (e.g., SANDAG)?

Recreation

- Subsection 4.5.2.1 Recreational Use indicates 0.25 miles was used for identifying recreational resources; we believe that one (1.0) mile is more appropriate. Please revise table 4.5-1 to provide data within one mile.