

Comment Letter O8



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June 1, 2015

SENT BY EMAIL

Ashley Gungle  
County of San Diego  
Department of Planning and Land Use  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
Ashley.Gungle@sdcounty.ca.gov

Re: San Diego Gas & Electric Company's Comments on the  
Draft Environmental Impact Report for the Jacumba Solar Project

Dear Ms. Gungle:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Jacumba Solar Project. As the Draft EIR notes on page S-2, power from the Jacumba Solar Project's onsite private substation would be delivered to the 138 kilovolt (kV) bus at San Diego Gas & Electric Company's (SDG&E) East County Substation via an approximately quarter-mile 138 kV power line (referred to as the "gen-tie line").

O8-1

The gen-tie line would extend overhead directly east from the onsite private substation to the East County Substation, within a 125-foot private right-of-way. A transition pole would be constructed at the interconnection point at the East County Substation. SDG&E intends for the following comments to facilitate environmental review of the gen-tie line.

**Aesthetics.** The Draft EIR concludes that the Jacumba Solar Project would result in a significant and unavoidable impact to existing visual character and quality of the site (Impact AE-1) and a significant and unavoidable cumulative impact to existing visual character and quality of the interstate viewshed (Impact AE-3). The Draft EIR states on pages 2.1-43 to 2.1-44 that these impacts would be significant and unavoidable because "feasible mitigation has not been identified that would reduce color contrast within the solar facility; line and color contrast at Project edges associated with perimeter access roads; and form, line, and color contrasts associated with connector line monopoles." As noted on page 2.1-24, the gen-tie would consist of approximately three monopoles.

O8-2

Response to Comment Letter O8

San Diego Gas & Electric  
Adrianna B. Kripke  
June 1, 2015

O8-1 Comment noted.

O8-2 Comment noted.

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SDG&E requests reconsideration of whether the approximately three monopoles for the gen-tie contribute to the significant and unavoidable impacts for Impact AE-1 and Impact AE-3. SDG&E believes that the approximately three monopoles for the gen-tie do not contribute to these significant impacts based on their small number relative to the existing electric structures in the area.

08-3

**Cultural Resources.** SDG&E has provided technical comments on cultural resources in the attached table. Additionally, please confirm when the records search was conducted at the South Coastal Information Center (SCIC). The Cultural Resources Technical Report indicates that the records search was conducted in 2011. Data from 2011 are out of date, and SDG&E recommends updating the records search at the SCIC.

08-4

The analysis of cultural resources does not seem to account for relevant cultural resource information identified during construction of the East County Substation. This information is contained in the following confidential report: "Williams et al., 2014 - Archaeological Research Analysis at SDI-7074 Within San Diego Gas & Electric Company's East County Substation Project (ECSP), San Diego County, California." Please feel free to contact me so that SDG&E can provide the confidential report in accordance with the appropriate confidentiality measures.

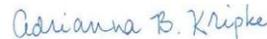
08-5

**Mitigation Measures.** The first paragraph on page 7.1 of the Draft EIR incorrectly identifies SDG&E as the Applicant for the Jacumba Solar Project. For clarity, SDG&E requests that the name of the Applicant be corrected.

08-6

SDG&E greatly appreciates the County of San Diego's consideration of these comments. Please contact me if you have any questions.

Sincerely,



Adrianna B. Kripke  
 Senior Environmental Counsel  
 San Diego Gas & Electric Company

**Attachment:**

1. Table of Technical Comments on Section 2.3 – Cultural Resources

**08-3**

Discussion of visual impacts, including the identified three monopoles, is found in Section 2.1, Aesthetics, of the DEIR. The County disagrees with the commenters interpretation of the visual impacts resulting from the three monopoles. While it can be acknowledged that the limited number and exterior finish of the three monopoles that would run between the Project and the nearby ECO Substation may not contrast with the surrounding visual character as substantially as the existing and proposed electrical structures, these monopoles are a component of the Jacumba Solar Project. Therefore, when considering the potential for impacts to visual character, at both a project and cumulative level, the Project as a whole must be analyzed, not at a component-by-component basis.

**08-4**

Comment noted. Responses to these technical comments are provided as individual responses below.

**08-5**

The cited document was not available at the time the Cultural Resources Technical Report was prepared. The document has now been obtained and reviewed, and the FEIR and Appendix 2.3-1 updated accordingly with site numbering revisions necessary as identified in responses to comments O8-8 and O8-9. SDGE's efforts to update the site record for CA-SDI-7074 resulted in simple extending of site boundaries for CA-SDI-7074 until they intersected with CA-SDI-6119/19627 without any discussion on the site form of

	<p>physical work within the limits of CA-SDI-6119/19627. For that reason, SDGE’s analysis of the potential significance of archaeological deposits within the gen-tie corridor provide no additional data than that in the original recordation efforts by Berryman et al. Dudek’s (2014) technical report (Appendix 2.3-1) notes that potentially significant archaeological deposits are located in the southeastern part of the gen-tie corridor of CA-SDI-6119/19627, but the gen-tie footprint does not intersect the mapped location of those deposits. For this reason, no significant impacts have been identified within CA-SDI-6119/19627 in the gen-tie alignment, although the potential for such impacts was noted in Dudek’s (2014) technical report and the DEIR. Monitoring during construction, significance evaluation and mitigation, if necessary of any deposits discovered during construction is required (M-CR-1).</p> <p><b>O8-6</b> The County agrees with the identification of this error and has revised the first paragraph on page 7-1 of the EIR to correct for the misidentification of the project applicant.</p>
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**ATTACHMENT 1**

San Diego Gas & Electric Company's Comments on the  
 Draft Environmental Impact Report for the Jacumba Solar Project  
 Attachment 1

Table of Technical Comments on Section 2.3 – Cultural Resources

SDG&E Comment	Section	Page	Paragraph and Line or Table	General Comment	Existing Language	Proposed Language
O8-7	Section 2.3.1.4 – Survey and Evaluation Results	2.3-4	First and second paragraphs	Cultural resource information identified during construction of the East County (ECC) Substation indicates that CA-SDI-7074 has subsumed the boundary of CA-SDI-6119/19627. The Cultural Resources Technical Report mentions CA-SDI-7074, and the Draft Environmental Impact Report (EIR) should too. Please address this throughout the Draft EIR, including on page 2.3-4 and in Table 2.3-1.  Also, the reference on page 2.3-4 to CA-SDI-6119/19627 should be to CA-SDI-6119/19627.	All of the previously recorded resources within the Project area were relocated, including the two sites which intersect the ADI (CA-SDI-6119/19627 and CA-SDI-18765).  Previously recorded prehistoric site CA-SDI-6119/19627 is the only site located in the gen-tie corridor.	All of the previously recorded resources within the Project area were relocated, including the two sites which intersect the ADI (CA-SDI-7074/6119/19627 and CA-SDI-18765).  Previously recorded prehistoric site CA-SDI-7074/6119/19627 is the only site located in the gen-tie corridor.
	Section 2.3.6 – Conclusion	2.3-29	Table 2.3-1			
O8-8	Section 2.3.1.4 – Survey and Evaluation Results	2.3-4	Second paragraph, second sentence	The report referred to as "Berryman et al. (2009)" was only a surface survey.  The Cultural Resources Technical Report discusses the draft version of the	Portions of this site were evaluated on three separate occasions by Jordan (2010), Berryman et al. (2009), and Williams and Whitley (2011). Overall, all three studies concluded that the evaluated portions of the site did not meet the criteria to be considered eligible for	Portions of this site were evaluated on <del>three</del> <u>three (3)</u> separate occasions by Jordan (2010), Berryman et al. (2009), and Williams et al. (2011). Overall, <del>two of the three</del> <u>two of the three</u> studies concluded that the evaluated portions of the site did not meet the

**O8-7** The FEIR has been updated to include the revisions to the reference to the site record identified in this comment.

**O8-8** This comment suggests evaluation of site CA-SDI-7074. The site CA-SDI-7074 study mentioned in this comment was not filed with the South Coastal Information Center at the time the analysis for the DEIR was prepared, however, the FEIR has been updated to include reference to the study. The comment indicates CRHR/NRHP eligibility of site CA-SDI-7074 as a result of SDGE's contractor (Williams et al.) combining CA-SDI-7074 with the previously recorded resource CA-SDI-6119/19627 (which was analyzed in the DEIR). The result is a newly-drawn site boundary that overlaps much of the gen-tie corridor artificially inflating the possibility of impacting deposits on the surface or subsurface. The DEIR studied sites CA-SDI 6119/19627 and CA-SDI-7074 in their pre-merger condition, specifically including CA-SDI-7074 where the gen-tie alignment would extend. No significant resources are recorded with the proposed gen-tie alignment. CA-SDI-6119/19627 was subject to micro-mapping and several different field sessions during which "potentially significant" deposits were identified in the gen-tie corridor but the current gen-tie alignment avoids those portions. Based on existing information, therefore, substantial evidence demonstrates that there are unlikely to be

O8-8  
Cont.

SDG&E Comment	Section	Page	Paragraph and Line or Table	General Comment	Existing Language	Proposed Language
				<p>following recent survey, evaluation, and data recovery report for the ECO Substation. "Williams et al. 2014 - Archaeological Research Analysis at SDI-7074 Within San Diego Gas &amp; Electric Company's East County Substation Project (ECSP), San Diego County, California.</p> <p>The Draft EIR should discuss the final version of this report. The portion of the site that overlaps with the ADI of the gen-tie has not been evaluated and should be treated as eligible. Future ground disturbing work should include avoidance of areas containing a higher likelihood of buried deposits, minimization of ground disturbance, data recovery, and full-time archaeological and Native American monitoring.</p>	<p>listing in the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). Enough of the project site was evaluated through these studies that additional evaluation work was not necessary for the current project. All areas located in the current proposed ADI of the gen-tie are those that have been determined not significant/not eligible.</p>	<p>criteria to be considered eligible for listing in the California Register of Historical Resources (CRHR) or National Register of Historic Places (NRHP). <b>Enough of the project site was evaluated through these studies that additional evaluation work was not necessary for the current project. All areas located in the current proposed ADI of the gen-tie are those that have been determined not significant/not eligible. One of the studies, Herriman et al., was a surface survey, and an subsurface testing was conducted for CRHR/NRHP eligibility. The fourth study, Williams et al. (2014), evaluated portions of the site, CA-SDI-7074, beneath the current ECO Substation and determined that CA-SDI-7074 contains deeply buried features and has been recommended and determined eligible for CRHR/NRHP. The portion of the site that overlaps with the ADI of the gen-tie has not been evaluated and should be treated as eligible. Future ground disturbing work for the site should include avoidance of areas containing a higher likelihood of buried deposits, minimization of ground disturbance, data recovery, and full-time archaeological and Native American monitoring. In addition, a monitor and discover plan should be</b></p>

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any archaeological deposits within the gen-tie corridor which would contribute to the eligibility/significance of CA-SDI-7074 as a result of extending site boundary line for CA-SDI-7074 to now cover the gen-tie corridor. Notwithstanding the site nomenclature (i.e., CA-SDI-7074 vs 6119, etc.) the Dudek (2014) report anticipates buried deposits and appropriately calls for monitoring during construction based on available site boundaries and observations. If potentially eligible portions of the resource are discovered then required mitigation measure M-CR-1 will be enforced and is adequate to reduce any potentially significant impact to below the level of significance. The area where eligible/potentially eligible resources were identified is the portion studied as site CA-SDI-6119/19627 before that site that was 'merged' with site CA-SDI-7074 to now include the gen-tie property. The area that has been identified as potentially containing significant resources would not be disturbed as part of the project and no significant resources would be impacted. Moreover, the prudent mitigation measure M-CR-1 applies and requires monitoring during ground disturbances and testing for eligibility should anything be discovered during construction and then appropriate avoidance or curation of resources if necessary. Implementation of the mitigation measure avoids a potential significant impact from discovery of unknown resources. The

SDG&E Comment	Section	Page	Paragraph and Line or Table	General Comment	Existing Language	Proposed Language
O8-9	3	2.3-14	Second and third paragraphs	SDG&E recommends revising the text to differentiate between the one significant site and the remaining six sites.	All seven evaluated archaeological sites within the Project ADI are considered not significant, and none are recommended as eligible for listing in the NRHP, CRHR, or local register (see Table 2.3-1), thus the sites are not significant "historical resources" under CEQA Guidelines Section 15054.5. Additionally, none are considered significant cultural resources under the standards of the County's RPO. These findings are based on the lack of significant archaeological deposits, and low artifact density and diversity at each resource that would otherwise provide a strong research context for refining and contributing to local and regional culture histories. It is also based on the homogeneity/undiversity of flaked lithic debris constituting the vast majority of artifacts in the Project area, and within nearby areas targeted by unrelated, previous investigations.	<del>developed to address any discoveries during construction.</del>
					Based on the evaluation of the seven archaeological sites, impacts from project construction are considered less than significant. However, there is still the potential for the discovery of unknown archaeological deposits during earth moving activities and there is still the potential for significant impacts	<b>All One</b> of the seven evaluated archaeological sites within the Project ADI, CA-SDI-7074(119/19627), is considered significant, recommended eligible for the NRHP and CRHR, and is considered a significant "historical resource" under CEQA Guidelines Section 15054.5. Future ground disturbing work for the area site should include avoidance of areas containing a higher likelihood of buried deposits, minimization of erosion, disturbance, data recovery, and full time archeological and Native American monitoring. In addition, a monitoring and discovery plan should be developed to address any discoveries during construction. The remaining six sites are considered not significant, and none are recommended as eligible for listing in the NRHP, CRHR, or local register (see Table 2.3-1), thus the sites are not significant "historical resources" under CEQA Guidelines Section 15054.5. Additionally, none are considered significant cultural resources under the standards of the County's RPO. These findings are based on the lack of significant archaeological deposits, and low artifact density and diversity at each

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O8-9

text in the FEIR has been revised consistent with the updated information provided in the comment, no changes to the significance conclusions or mitigation measures are suggested or necessary in response to this comment.

The FEIR has been updated to include revisions to reference the study identified in this comment. The text on page 2.3-4 of the FEIR has been revised consistent with the updated information provided in the comment. There is no compelling reason to treat the portion of CA-SDI-7074 (originally CA-SDI-6119/19627) within the gen-tie as eligible. As described in Response to Comment O8-8 above, simply expanding the CA-SDI-7074 boundary line does not extend historical significance. Previous efforts at CA-SDI-6119/19627 identified areas of higher potential for buried or significant archaeological deposits, as stated in Berryman et al. and by Dudek (2014), and the current gen-tie alignment avoids those areas that are located in the southeastern part of the gen-tie parcel. Potentially significant impacts could occur if the alignment shifted to impact those areas with higher potential, or if preconstruction inspection efforts identify new areas of higher sensitivity. No changes to the significance conclusions or mitigation measures are suggested or necessary in response to this comment.

O8-9  
Cont.

SDG&E Comment	Section	Page	Paragraph and Line or Table	General Comment	Existing Language	Proposed Language
					to cultural deposits, if discovered. This impact would be considered <b>potentially significant (CR-1)</b> .	resource that would otherwise provide a strong research context for refining and contributing to local and regional culture histories. It is also based on the homogeneity/redundancy of flaked lithic debits constituting the vast majority of artifacts in the Project area, and within nearby areas targeted by unrelated, previous investigations.  Based on the evaluation of the seven archaeological sites, impacts from project construction are considered <b>less than significant for six of the seven sites. One of the sites, CA-SH-7074 (1919627), has been evaluated and determined eligible due to significant buried deposits. Therefore, impacts from construction would be considered potentially significant (CR-1).</b>  <del>However,</del> There is still the potential for the discovery of unknown archaeological deposits during earth moving activities <b>at the remaining six sites</b> , and there is still the potential for significant impacts to cultural deposits, if discovered. This impact would be considered <b>potentially significant (CR-1)</b> .