

**From:** [Cason, Elizabeth A](#)  
**To:** [Harris, Susan](#)  
**Subject:** JVR Solar Project Draft EIR Comment Letter  
**Date:** Thursday, December 03, 2020 11:23:31 AM  
**Attachments:** [JVR Solar Draft EIR Comment Letter.doc](#)

---

Good morning Ms. Harris, attached please find San Diego Gas & Electric Company's comment letter for the JVR Solar Project Draft EIR. Please let me know if you have any difficulty with the document.

Thanks very much,  
Elizabeth Cason

Elizabeth Cason  
Senior Counsel  
Environmental Law Department  
San Diego Gas & Electric Company  
8330 Century Park Court, CP32B  
San Diego, CA 92123-1530  
Tel: 858.654.1560  
Mobile: 858.602.9392  
Email: [ecason@sdge.com](mailto:ecason@sdge.com)



Elizabeth A. Cason
Senior Counsel
8330 Century Park Court, CP32B
San Diego, CA 92123
(858) 654-1560
ecason@sdge.com

December 3, 2020

Via Email

Susan Harris
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Susan.Harris@sdcounty.ca.gov

Re: San Diego Gas & Electric Company Comments on JVR Energy Park Project Draft EIR

San Diego Gas & Electric Company (SDG&E) thanks the County of San Diego for the opportunity to provide comment on the JVR Energy Park Project (Project) Draft Environmental Impact Report (EIR). We believe the County has prepared a thorough document that analyzes the potential environmental impacts as required by the California Environmental Quality Act (CEQA). In preparation of the Final EIR for the Project, SDG&E asks that you consider the following comments and suggestions.

02-2

- All work within SDG&E right-of-way (ROW), including easements and facilities, will be subject to California Public Utilities Commission (CPUC) jurisdiction, and consequently would not be subject to County jurisdiction or to the requirements of the Major Use Permit issued by the County for the operation and maintenance of the remainder of the Project.

02-3

- As required by CEQA, the EIR shall address all potential impacts to environmental resources, both temporary and permanent, and shall be sufficient to secure all required mitigation related to the Project, including but not limited to the Project components either constructed or ultimately owned by SDG&E.

02-4

- Landscaping, revegetation and/or habitat enhancement plans for the Project shall not inhibit SDG&E's access to its facilities for purposes including, but not limited to, construction, upgrades, repair, operation or maintenance. All Project mitigation measures must be placed outside of SDG&E rights-of-way (including any future rights-of-way), access roads, and maintenance pads.

02-5

02-6

- Finally, we would like to briefly comment on the section of the EIR that addresses mineral resources. As written on page 2.8-11 of the Draft EIR, the text lends itself to potentially conflicting readings. For instance, it says that "it is conservatively assumed that 188 acres of open space easement and the 3.2 acre switchyard could create a significant impact with respect to the permanent loss of minable, processable, and marketable mineral resources...which in combination exceed the County's minimum value threshold." In the following paragraph it makes clear that the switchyard site, standing alone, does not result in a significant impact, but SDG&E suggests that the prior paragraph could be revised to further emphasize that point, as follows: "it is conservatively assumed that 188 acres of open space

02-7

easement and the 3.2 acre switchyard, **when considered together**, could create a significant impact with respect to the permanent loss of minable, processable, and marketable mineral resources...which in combination exceed the County's minimum value threshold."

O2-7  
contd.

Very truly yours,

A handwritten signature in blue ink that reads "Elizabeth A. Cason". The signature is written in a cursive style.

Elizabeth A. Cason