

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 5 2016

Brittney Lee, Esq.
Regulatory Case Administrator
San Diego Gas & Electric
8330 Century Park Court, CP32F
San Diego, CA 92123

Re: Data Request #1 for the SDG&E Ocean Ranch Substation Project– Application No. A.1607016

Dear Ms. Lee,

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that SDG&E has provided, including the Application and Proponent's Environmental Assessment and the PEA deficiency response items submitted on August 26, 2016. The final determination on completeness is pending. However, during the analysis of the aforementioned materials, we have identified additional information needed from SDG&E. This will not affect the completeness determination; it is standard practice to issue data requests when we need clarification of additional information during preparation of the CEQA documentation.

Attached please find Data Request No. 1, which defines the additional questions we have at this time. Additional data requests may be necessary to address other CEQA topics as we move forward with environmental review.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current schedule. We request that responses be provided to us within two weeks (by October 21), if feasible. We understand that some of these requests may require more time; however, we request that information be provided to us as soon as each response is available, along with an estimated response date for any information that can't be provided within two weeks.

Please submit one set of responses to me and one to Fritts Golden at Aspen Environmental Group in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me, at (415) 703-2642 or William.Maguire@cpuc.ca.gov

Sincerely,

/S/ William Maguire

William Maguire
Project Manager
Energy Division, Infrastructure Permitting and CEQA

Attachment

cc: Molly Sterkel, Program Manager, Infrastructure Planning and Permitting
Mary Jo Borak, CPUC Supervisor CEQA Unit
Darcie Houck, Administrative Law Judge
Greg Heiden, CPUC Attorney
Fritts Golden, Aspen Environmental Group

SDG&E Ocean Ranch Substation Project – A.1607016

Data Request No. 1

Ocean Ranch Substation Data Request No. 1 includes data requests for the following topics:

- General
- Project Description
- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils
- Noise

General

GEN-1

Please confirm:

- (a) That the area of potential disturbance from the Proposed Project is limited to the substation site property and adjacent roads, and the various yards identified as potential work/storage areas.
- (b) That no work is planned to occur in San Luis Rey, Morrow Hill, and Melrose substations

GEN-2

The Project Description identifies an “initial” and “ultimate” configuration. We recognize that the “initial” configuration would be implemented by the near-term construction schedule (shown in SDG&E’s Application Appendix A). Although the timing may be uncertain, the environmental review may need to consider the “ultimate” configuration to be the full scope of the Proposed Project. To clarify the scope of the project, please confirm:

- (a) That the “ultimate” configuration is the scope of the Proposed Project as defined in the Application for a Permit to Construct.
- (b) That the “ultimate” configuration was considered within in the Application’s Magnetic Field Management Plan (Application Appendix F) and Estimated Project Costs (Application Appendix H).
- (c) Whether the “ultimate” configuration would likely include any new 69 kV transmission right-of-way or transmission circuit corridors in order interconnect and use the ultimate transformer capacity proposed for the site. If so, where would the new ROW or circuits likely be located?

Project Description

PD-1

PEA Section 3.1 (and Section 3.5.2) describes TL 6966 and says the construction of an underground power line duct back will have a length of approximately 1,500 feet. However, the distance between where the TL would depart its current location in the intersection and loop into the substation is much less than 1,500 feet.

- (a) Are the new TLs lines between the substation and the existing TL 6966 each approximately 750 feet, with the total length of the duct bank 750 feet and of the new lines (conductor) 1,500 feet (2 x 750 feet)?
- (b) Please confirm there will be one duct bank with 3 conduits on one side occupied by TL6966 and three conduits on the other by the renamed TL 6979, as depicted in Figure 3-10 (page 3-18).

- (c) Figure 3.2 indicates the 69 kV lines in and out of the substation as being parallel up to a point, then separating within the substation. Please describe what happens with these lines within the substation. Are the lines in a single duct bank and then they are in separate duct banks in the substation?
- (d) Ultimate build out has 4 69kV positions in the substation. The Proposed Project accounts for 2 positions. At ultimate build out, it is assumed that an additional 69 kV line will need to loop into the substation. Please describe whether the duct bank proposed to be installed in Avenida del Oro will have spare capacity to install a future 69 kV line or if new construction would be required in the future to install a second duct bank. It appears from Figure 3-2 that TL 694 shares the existing underground duct bank with TL 6966. Is it anticipated that the existing duct bank position occupied by TL 694 (as shown in Figure 3-2) will be converted to a new line to loop into the substation?
- (e) Please confirm that the 69 kV line is single circuit. The text does not explain if it is a single or double circuit. From the alternatives discussion (PEA Summary Section 1.3) it appears that it is a single circuit for the Proposed Project and that at ultimate build out a second 69 kV single circuit would be required from San Luis Rey Substation. Please clarify.

PD-2

Refer to Figure 3-2 (page 3-3). During the field site visit, SDG&E indicated that 12 kV lines from Ocean Ranch Substation would terminate at existing connection points, including on Windansea Street. The figures and description are not consistent.

- (a) Figure 3-2 has labels at two locations that read: "Trench to existing handhole on Windansea Street". This suggests that the 12 kV trenching for the Project extends that far. It is not clear if the 12 kV line installations end where show in the figure, or if lines are extend to Windansea Street as part of the Project. Please clarify.
- (b) The figure indicates a 12 kV line extending into Rocky Point Drive, but text in Section 3.5.3 (page 3-19, paragraph 5) says there are 4 circuits and describes these 4 circuits as all in Avenida del Oro. It is silent about a circuit in Rocky Point Drive. The text also discusses "ultimate" connections. Please provide a revised figure that distinguishes what lines are part of the Proposed Project and their end points, what lines are existing lines, and what are future lines that are not part of the project. If the Proposed Project extends lines to Windansea Street or other locations, this should be shown in the figure.
- (c) If revisions are made regarding the length of trenches and duct banks, be sure that this is accounted for in estimated volumes and truck traffic, and relevant tables are revised and provided.
- (d) Figure 3-2 and Figure 3-5 show somewhat different locations for 12 kV lines. Please verify planned locations and amend figures as needed.
- (e) Figure 3-2 indicates that TL 694 and TL 6966 are in Avenida del la Plata and that TL 694 continues to Melrose Substation while TL 6966 loops into Ocean Ranch Substation. However, the text states that TL 693 shares poles with TL 6966 until TL6966 goes underground. The text does not explain what happens to TL 693. Figure 3.3 provides a schematic of the existing system line configuration. This indicates

that TL694 runs to Melrose from Morro Hill. Do TL 693 and TL 694 share the overhead structures north of Avenida de la Plata, and does TL 694 join TL 6966 in the duct back at the point where TL 693 heads north? (This is an assumption that needs clarification.) If TL694 shares a duct bank with TL 6966, and a short duct bank segment at the intersection of Avenida de la Plata and Avenida del Oro is abandoned because of the loop in to the substation, what becomes of TL 694?

PD-4 Several figures in the PEA are illegible or do not reproduce well, possibly because they are reductions of larger images. Please provide replacement figures that are clearly legible when they are reproduced at 8.5 x 11 or 11 x 17. If figures are derived from larger images or drawings that lose clarity with reduction, please advise of this in order that we can discuss the best way of obtaining the data to create legible figures. See also Data Requests below regarding figure content. If GIS data previously provided are modified by this data request, please provide revised data.

The figures are greatest concern are:

- Figure 3-5 Proposed Ocean Ranch Substation Ultimate Layout
- Figure 3-6 Proposed Ocean Ranch Substation Initial Arrangement
- Figure 3-7 Proposed Ocean Ranch Substation Ultimate Arrangement
- Figure 3-8 Proposed Ocean Ranch Substation Ultimate Arrangement 69 kV Low Profile
- Figure 3-16 Typical Telecommunication Monopole

PD-5 Refer to Figure 3-5 Proposed Ocean Ranch Substation Ultimate Layout (page 3-14):

- (a) Figure 3-5 should be modified to clearly depict the potential internal facilities, and the facilities that would be installed in the eastern portion of the site.
- (b) Facilities shown on Figure 3-5 are not consistent with those shown on the Conceptual Landscape Plan (PEA Appendix B, sheet LC-4). Please ensure that the depictions are consistent, and distinguish the components of the “initial” configuration versus those under the “ultimate” configuration.
- (c) Figure 3-5 references a “Sheet 2 for 12kV continuation.” Please provide this sheet if it includes any elements of the Proposed Project or ultimate buildout.
- (d) Reconcile this figure with Figure 3-2 with regard to proposed, existing, and future components.
- (e) Explain the dashed lines through the center of the figure. From the legend, these appear to represent a 69 kV transmission line, which is not discussed in the text or which does not exist.
- (f) Please identify the location of equipment in the substation for the ultimate build out to 120 MVA. Include the location of battery storage that is listed on page 3-10 as a future component. If needed for clarity, provide a figure that shows components for the Proposed Project and a figure for ultimate build out of the site.
- (g) In Figure 3-5, the legend identifies the green line on the figure as both TL 693 and TL 6966, but the text discusses only TL 6966 looping into the substation. Figure 3-2 identifies this same line (in purple dashes) as TL 694 and TL 6966. Figure 3-5 also

indicates that a section of conduit is abandoned. Please clarify whether the line is TL 694 or TL693, and whether the section of underground conduit shown in Figure 3-5 as “To Be Abandoned” will in fact be retained for this TL. Will there be a new vault installed at this street location (where TL 6966 diverges from its original route and loops into the substation? Based on Figures 3-3 and 3-4, is it correct that:

1. TL 6966 (currently from San Luis Rey to Melrose) will be looped into Ocean Ranch, creating TL 6966 (San Luis Rey to Ocean Ranch) and TL 6979 (Ocean Ranch to Melrose)
2. That TL 693 from San Luis Rey shares overhead structures with TL 6966, but near where TL 6966 transitions underground, TL 693 diverges overhead north, and then east along the north side of the Ocean Ranch Substation site en route to Melrose.
3. TL 694 extends south from Morro Hill overhead and then transitions underground with TL6966 at Avenida de la Plata and continues underground to Melrose.
4. Do TL 6966 and TL 694 share a common underground duct bank? If so, does TL 694 require retention of the duct segment labelled “to be abandoned” in Figure 3-5, or is it in a separate duct bank and the abandoned segment refers only to TL 6966?

(h) Label site features on figures that are discussed in the text (e.g., control building, wall, gates, storm water basin(s), communication tower, etc.). Either label on the figure, or use letters or numbers corresponding to a legend. Be careful to distinguish between what is proposed as part of the Project and what is future, ultimate configuration.

PD-6 The “ultimate” configuration would include battery storage that is not described in any detail.

- (a) Please describe the proposed battery storage in more detail. Describe how it would function, its specifications including physical size and housing, and any potential source of noise, such as cooling fans.
- (b) Would the battery storage of the ultimate configuration be suitable as a Distributed Energy Resource or as a partial implementation of the alternative that was considered but rejected (PEA Section 5.3.5.3, p. 5-5)?

PD-7 Refer to Figure 3-6 Proposed Ocean ranch Substation Initial Arrangement (page 3-14)

- (a) Please provide a legible figure.
- (b) The figure references a Sheet 2 continuation. Please provide this sheet if it has any elements of the Proposed Project or ultimate project.

- PD-8** Refer to Figure 3-6 Proposed Ocean Ranch Substation Initial Arrangement and Figure 3-7 Proposed Ocean Ranch Substation Ultimate Arrangement
- (a) Figures 3-6 and 3-7 are not consistent with what is shown in Figure 3-5. Compare the location of 69 kV and 12 kV end points between these figures and make consistent.
- PD-9** PEA Section 3.3.3, page 3-8, states that “SDG&E is requesting access rights from the City of Oceanside to establish the proposed access driveway that will be limited to SDG&E personnel.”
- (a) Please confirm that Oceanside has granted this access from the street or the status to date. If it is not granted or not at the indicated location, how would that affect the substation design?
- PD-10** PEA Section 3.5.1, second paragraph page 3-11, states that gates “will be constructed from chain-link material and will be designed to accommodate standard brown slats.”
- (b) Please confirm that slats will be installed and the material to be used.
- (c) Will the color be similar to that of the perimeter wall?
- (d) The wall and slats are described as “brown”, but in simulations in the Aesthetics section it appears to be more sand or sandstone in color. Please confirm the description of the color.
- PD-11** PEA Section 3.5.1 at page 3-12 notes that a global oil containment system will be installed “inside the substation.” The same page identifies that lights will be located at the entry gates and will be on at night, and that other lighting will be off except when needed for night work or in an emergency. The text also says lighting will be installed on each substation wall.
- (a) Containment: Please identify where the containment will be located and include it on project figures showing the site after development.
- (b) Lighting: There are 3 gates (2 at the main entry point); is it correct to assume there will be three entry lights, one at each gate? Will they be mounted on the wall or free standing? How tall will light standards be, if poles are used? Will lights proposed “on each substation wall” be on the inside of the wall or outside? Will any lights be visible above the 10-foot wall height?
- PD-12** PEA page 3-11, bullet list under Site development Includes, identifies a “future use pad directly adjacent to the substation” and “two flow through planter basins
- (a) Please describe where the “future use pad” is located and include it on figures. In Appendix B Conceptual Landscape Plan, there are rectangular structures outline to the east of the main substation equipment. Please identify these rectangles. Is this the future use pad? Are the rectangles the future battery storage listed on page 3-10?
- (b) Please label the planter basin locations on figures. Please also provide a description or drawing showing the construction of these basins (slopes, volume, drains, overflows, lining and underlayment material, etc.).

(c) Please confirm the fate of any overflow or drainage not retained in the basins. Based on the drawings in Appendix B, it appears that they will drain to the public storm sewer system in Avenida del Oro.

PD-13 PEA, Construction Practices, fifth open bullet, page 3-49, Identifies “BMP Manual Measures 1-7” in the construction practices list. .

(a) Please provide a copy of these measures

PD-14 PEA Page 3-52, identifies SDG&E Electrical Standard Practice 113.1 as the Project Fire Prevention Plan.

(a) Please provide a copy of this document or the relevant sections that comprise the Project Fire Prevention Plan.

PD-15 PEA Section 3, Page 3-53, second open bullet under SF6 mitigation strategies. Second sentence reads “This program includes monthly visual inspections of each geographic information system (GIS)...” Please confirm that in this instance GIS refers to gas insulated switchgear and not geographic information system.

PD-16 PEA Section 3.8.1.1, Page 3-48, paragraph 3 states that maintenance inspection of the new 69 kV loop-in would require traffic controls for safety; however, the two new vaults are within the substation so it is not clear what traffic controls would be needed. Is there a new vault (unidentified in the PEA) at the point where the new loop-in line departs from and returns to the original underground TL 6966 location at the intersection of Avenida de la Plata and Avenida del Oro?

PD-17 PEA Section 3.6.4, Page 3-46, includes PEA Table 3-7, which shows that cut and fill material requirements may not be balanced, and that 18,600 cubic yards may be needed for import. Please confirm this amount for the estimated imports and describe the likely origin of the imported material.

Aesthetics

AES-1 See Figure 4.1-8 Simulation 1, page 4.1-16. The monopole to support the microwave dish is substantial and visually prominent. Please confirm the diameter and height of the proposed monopole and that this size (diameter) monopole is required to hold the single 2-foot diameter microwave dish. Does SDG&E anticipate adding additional antennas or other devices to the monopole in the future?

AES-2 Figure 4.1-4 depicts the viewshed analysis that identifies surrounding locations from which elements of the substation may be visible. Apparently 16 features were selected for use in determining the number of features visible from offsite. These are represented by dots. The dot locations do not include the proposed site for the microwave pole and antenna; it is not clear whether the pole was one of the features considered. The text says the viewshed was created from data points “in the middle of the site.” Please, confirm whether the pole and dish antenna were considered in the viewshed analysis.

AES-3 Figure 4.1-7 uses an air photo base to show the location and orientation of photographs and simulations provided in the PEA. Please provide the date when the viewpoint photos were taken and the age of the air photo used in this figure, if known. Google Earth historic photos show the Federal Express site on Avenida del Oro being graded in 4/2015, and the

facility as largely complete by 3/2016, the date of the most recent Google Earth satellite image. If we know the date or year of the air photo used in the figure, and when the field photos were taken, we can explain this in the text.

- AES-4** Figure 4.1-8 Simulation 1 shows the proposed microwave monopole. The color specified in the PEA for electrical equipment inside the substation is ANSI 70 grey with other elements being identified as galvanized steel. Presumably the monopole would be galvanized steel. Please confirm that the color used in the simulation is what is expected for a galvanized steel monopole; it appears to be darker. Also, confirm that the antenna mounted on the pole is grey in color and not galvanized steel color. If necessary, provide a revised simulation.
- AES-4** Regarding Existing Conditions/Simulations figures (Figures 4.1-8, 4.1-9, and 4.1-10), please provide electronic copies of the three “existing conditions” photos and the three corresponding “simulated conditions” as separate images, rather than as an overlapping composite as provided in the PEA. These should be JPGs of the highest resolution possible. Please advise if these are not available.

Biological Resources

“Project components” as used below means the substation site and adjacent streets and the staging yards.

- BIO-1** In Section 4.4.3, page 4.4-10, the PEA states that potential suitable habitat for western burrowing owl was identified in the Project study area (the substation site and staging yards) and protocol surveys will be done in 2017. Please identify the specific Project locations where potential suitable habitat for western burrowing owl was identified and indicate if any suitable burrows, surrogate burrows, or other sign was observed during surveys.
- BIO-2** In Section 4.4.3, page 4.4-15, the PEA states that potential roosting habitat for the western yellow bat occurs within the trees in the Melrose Yard. Please provide additional information on these trees, including approximate number, species, age (mature/young/sapling), and general height estimate. Please indicate if any of these trees will be trimmed or removed and the extent and timing of any planned trimming/removal.
- BIO-3** In Section 4.4.3, page 4.4-16, the PEA states that the San Luis Rey Substation is identified in the City of Oceanside SAP as being in a designated Wildlife Corridor Planning Zone. The Oceanside SAP also identifies local and regional gnatcatcher corridors (Figures 3-6 and 3-7 of the SAP). Please provide information on the location of Project components relative to local and regional gnatcatcher corridors and recent sightings of California gnatcatcher.
- BIO-4** In Section 4.4.4, page 4.4-16, the PEA lists Operational Protocols applicable to the Proposed Project, but the text of these protocols is not provided. The SDG&E Subregional Natural Community Conservation Plan (NCCP) includes the text of the referenced operational protocols and we have available a copy of this document dated December 15, 1995. Please indicate if this is the most recent version of the document, and if not, please provide the text of the applicable operational protocols or a current version of the NCCP.
- BIO-5** Section 1.2, page 1-2, of the PEA states that the Proposed Project’s Ocean Ranch Substation will have water quality basins, which are later described as flow-through

planter basins. Section 4.9 of the PEA provides information on water quality, but does not address wildlife impacts. Please provide additional information on any water quality issues or other issues associated with these basins that could affect wildlife during the operations and maintenance phase of the Proposed Project.

- BIO-6** In Section 4.18.8, page 4.18-7, the PEA states that the Proposed Project will involve permanent impacts on less than 0.16 acre of sensitive habitat, which consists entirely of Diegan coastal sage scrub. Section 4.4.3 of the PEA and the Biological Technical Report in Appendix D of the PEA indicate that the only sensitive habitat that will be impacted is disturbed southern riparian scrub. Please confirm the type and acreage of all sensitive habitats that will be impacted.
- BIO-7** In Section 4.4.3, page 4.4-15, the PEA states that there is no critical habitat located within the Project study area, but it is within 5 miles of critical habitat for several species. Based on Figure 4.4-3, it appears that critical habitat for coastal California gnatcatcher is in very close proximity to some Project components. Please provide additional information on the location of critical habitat for coastal California gnatcatcher relative to Project components.
- BIO-8** The Biological Technical Report, pages 19-20, in Appendix D of the PEA states that San Diego ambrosia has been reported within 1 mile of the Proposed Project and may occur in disturbed habitat. Although most of the Proposed Project is identified as disturbed habitat, the Biological Technical Report states that there is no suitable habitat for San Diego ambrosia in the Project study area and it has no potential to occur. Please provide additional information to support this determination. Were surveys done during the appropriate blooming period for San Diego ambrosia by a botanist/biologist with experience identifying the species? Were reference populations visited to verify that the species was in flower and could be identified? Please note that the blooming period for San Diego ambrosia is May to October. If it is determined that surveys are needed and have not been done, it may lead to delays while waiting for the plant to come into flower again.
- BIO-9** The Biological Technical Report, page 23, in Appendix D of the PEA states that Stephens' kangaroo rat has historically been reported within 1 mile of the Proposed Project and may occur in disturbed habitat. Although most of the Proposed Project is identified as disturbed habitat, the Biological Technical Report states that there is no suitable habitat for Stephens' kangaroo rat in the Project study area and it is not expected to occur. Please provide additional information to support this determination. Were Project components surveyed using approved protocols by a biologist possessing a Section 10(a)1(A) research permit for Stephens' kangaroo rat to determine if suitable habitat was present?
- BIO-10** In Section 3.6.1, page 3-31, the PEA states that Melrose staging yard is paved. However, in the Google Earth aerial photo (image date 3/22/2016), the yard does not appear to be paved and there may be vegetation present in addition to the trees in the image. Please confirm the substrate and vegetation at the Melrose staging yard, including dominant species actually present.
- BIO-11** In Section 3.6.1, page 3-31, the PEA states that USPS staging yard is composed of non-native grassland and disturbed non-native grassland. However, in Section 4.4.3, pages 4.4-12 through 4.4-14, the PEA states that only three vegetation communities were

identified on the Proposed Project: disturbed southern riparian scrub, urban/developed, and disturbed habitat. The Biological Constraints Mapbook in Appendix A of the Biological Technical Report (Appendix D of the PEA) depicts the USPS staging yard as disturbed habitat. However, the description of disturbed habitat on page 4.4-13 of the PEA specifically excludes non-native annual grassland. Please clarify the vegetation community present in the USPS staging yard, including dominant species actually present.

- BIO-12** In Section 4.4.3, page 4.4-10, the PEA states that no jurisdictional wetlands or non-wetland waters were identified and the Biological Technical Report in Appendix D of the PEA states that a wetland delineation was conducted in 2015. However, a jurisdictional delineation report was not included in the PEA and only a very brief summary of the delineation is included in the Biological Technical Report. This summary states that there are no features that may be considered waters of the U.S., but does not specifically address RWQCB/CDFW jurisdiction. Please provide a jurisdictional delineation report that fully analyzes RWQCB/CDFW jurisdiction, as well as USACE jurisdiction.
- BIO-13** In Section 4.4.4, page 4.4-16, the PEA states that NCCP Operational Protocols will be utilized on the Proposed Project and lists six protocols. Please clarify if all NCCP Operational Protocols will be utilized (as applicable) or only the six protocols listed.
- BIO-14** In Section 4.4.3, page 4.4-13, the PEA states that disturbed habitat on the Project site is primarily in the form of areas regularly mowed or maintained and gives general examples of types of physical disturbance to habitat. Please provide information on the actual type, frequency, and extent of maintenance or disturbance that has occurred on the Project components, specifically the substation site, USPS staging yard, and Corporate Center staging yard.
- BIO-15** In Section 4.4.3, Table 4.4-1 indicates that the majority of the Project site is disturbed habitat and page 4.4-13 provides a general description of this vegetation community, including a list of some species that are typically found in disturbed habitat. Please provide a more detailed description of the vegetation community on each of the Project components identified as disturbed habitat, including the dominant species actually present, soil conditions, and type, level, and extent of past or on-going disturbance.
- BIO-16** Section 4.4.6, page 4.4-19 of the PEA states that the impact analysis is focused only on construction activities and does not consider impacts related to operations and maintenance. Please provide an analysis of the impacts of the Proposed Project on birds and nesting birds, including but not limited to electrocution hazards, during the operations and maintenance phase. Please include information on adherence to SDG&E avian protection procedures and APLIC guidelines for substations (see Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006; pp. 105-106).
- BIO-17** Section 4.4.5, pages 4.4-18 and 19 of the PEA provide Applicant Proposed Measures (APMs) for Biological Resources. Please specify if the APMs will be implemented during the operations and maintenance phase as well as the construction phase of the Project.
- BIO-18** Section 4.4.6, page 4.4-26, of the PEA states that the Proposed Project will not use the take authority granted by the USFWS and the CDFW in the SDG&E NCCP for impacts to covered species, and potential take of state species will be handled, as necessary, through consultation with the CDFW in accordance with applicable sections of the CESA. If potential take of federal species is identified, how will it be handled? Does SDG&E have

the option to apply for participation under the San Diego Multiple Habitat Conservation Program?

BIO-19 Are any components of the Proposed Project located in or near any preserves or preserve planning areas under the San Diego Multiple Habitat Conservation Program (MHCP) or SAP? If so, please provide maps and details.

BIO-20 Section 4.4.6, page 4.4-26, of the PEA states that some of the Project components are located in an area designated as Off-site Mitigation Zone in the City of Oceanside SAP, but construction will be conducted within disturbed or developed lands or paved roads, which do not contain suitable habitat for sensitive wildlife species. The SAP does not require mitigation for impacts to these land types. However, the disturbed riparian scrub on the substation site may be subject to mitigation under the SAP. Please provide additional information to address this issue and support the PEA's determination of "no impact" to CEQA checklist item f (Would the project conflict with the provisions of an adopted Habitat Conservation Plans, NCCP, or other approved local, regional, or state habitat conservation plan?).

BIO-21 The MHCP provides specific definitions of disturbed land versus non-native grasslands. Based on Google Earth images, it appears that the USPS staging yard, substation site, and possibly the Corporate Center staging yard include a significant component of non-native grasses. Please verify that the habitat types at all project components have been correctly characterized consistent with the definitions in the MHCP.

Cultural Resources

CULT-1 In Appendix J-1, page 5, it is stated in the Archival Research section that a records search was conducted at the South Coastal Information Center (SCIC) and that a search of the SCIC's GIS Inventory database was completed. Seven (7) resources are reported, including CA-SDI-645, CA-SDI-1280, CA-SDI-6136, CA-SDI-8090, CA-SDI-10445, CA-SDI-10446 and CA-SDI-14323. Also, in Appendix J-2, page 13, it is stated that previous project information and surveyed areas at the SCIC were examined, however, no mention of the number of previous surveys or titles of reports was included. Therefore, please provide:

- PDF copies of all seven (7) site records;
- PDF copies of all previous archaeological and ethnographic reports identified within 500 meters of the proposed project APE;
- Map(s) at 1:24000 scale showing the locations of known cultural resources within 500 meters of the proposed project APE that were identified during the SCIC search; and
- Maps at 1:24000 scale showing the exact location of all areas surveyed by staff of NWB Environmental Services, LLC, as described in the reports titled, "Archaeological Constraints Survey for the SDG&E Ocean Ranch Substation Project, Oceanside/North Vista, San Diego County, California (SDG&E eTS #28537)" (2015), and "Archaeological Resources Report for the SDG&E Ocean Ranch Substation Project, Oceanside/North Vista, San Diego County, California (SDG&E eTS#28537)" (2016).
- GIS data including polygon, point, and line data for all known site locations, previous survey and ethnographic report coverages, and new survey coverage of the project

site area as reported by NWB Environmental Services, LLC in 2016 report (see citation above).

- CULT-2** In Appendix J-1, Native American Consultation section, page 6, it is stated that on June 19, 2015, letters were sent to all contacts provided by the Native American Heritage Commission (NAHC). Please provide PDF copies of the request to search the NAHC Sacred Lands File database and request for tribal contacts. Please also provide PDF copies of all letters sent to tribes. Also, please provide evidence confirming that the San Luis Rey Band of Mission Indians, Pala Band of Mission Indians, and La Jolla Band of Mission Indians did, or did not, wish to consult on the project. If letters were received from any of these three (3) tribes, please provide PDF copies of those letters. In addition, please provide PDF copies of telephone and/or email conversation records documenting any follow-up efforts made with tribes identified by the NAHC, including the name of the person who called/emailed, name of the tribal person contacted, date, time of call/email, and a description of topics discussed.

Geology and Soils

- GEO-1** Please provide copies of the following documents/reports that are referenced in the geotechnical study by Kleinfelder (Appendix F of the PEA).
- Kleinfelder Inc., 2012, Geotechnical Siting Study, San Diego Gas & Electric, Proposed Ocean Ranch Substation, Pacific Coast Business Park - Parcels 7, 16 and 17, Oceanside, California.
 - San Diego Gas & Electric Company, 2012, Concept Layout Plan for Ocean Ranch Substation.
- GEO-2** Please provide a copy of the proposed Grading Plan for the site to help evaluate slope stability and erosion.
- GEO-3** Please provide the Geology GIS files used to produce Figure 4.6-1 and a full reference for these files.

Noise

- NOISE-1** No data are provided in support of the noise level forecast embodied in PEA Figure 4.12-2 (Noise Generated by Electrical Substation, p. 4.12-13). Please describe the transformer noise specifications that were assumed to apply in the analysis of developing the contours in the figure, in terms of the equivalent noise source level (Leq) and A-weighted decibels (dBA). Please identify the operating conditions assumed in creating the contours, including whether fan noise is included in the forecast.