

Devin Brookhart

From: Miller, Tyra <TYMiller@sandiego.gov>
Sent: Friday, March 07, 2014 12:24 PM
To: CNFMSUP
Subject: SDG&E Master Permit
Attachments: SDGE Supplemental Scoping Letter.pdf

Please see the attached the letter from the office of Jeff Pasek.

Thank You,
Tyra Miller



Tyra G. Miller

City of San Diego | Public Utilities

525 B Street | Suite 300 | San Diego, CA 92101

Ph. (619) 533-4122 | Email Tymiller@sandiego.gov

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THE CITY OF SAN DIEGO

March 7, 2014

Lisa Orsaba, California Public Utilities Commission
Will Metz, Forest Service Supervisor, Cleveland National Forest
c/o Dudek
605 Third Street
Encinitas, CA 92024

Dear Ms. Orsaba and Mr. Metz:

Subject: Notice of Supplemental Scoping, SDG&E Master Permit; Application No. A.12-10-009

We have reviewed the Notice of Supplemental Scoping dated January 15, 2014, and appreciate your consideration of our comments. Our comments are specific to a segment of Power Line C157, commencing at existing pole P278733 and to the west from that pole.

1. Retaining the existing alignment may be a superior alternative to the proposed new alignment in that it avoids additional impacts from construction and maintenance of new poles and new access roads. This option should be discussed in the Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS). The DEIR/DEIS should discuss the feasibility and constraints of retaining the existing alignment across the designated wilderness area. It appears that just two existing poles and about 500 feet of overhead are located in the wilderness area. Relocating an entire segment of this power line simply to take these two poles out of the wilderness may not be prudent.
2. If the new alignment is selected the following should be implemented
 - a. The new alignment should follow the existing maintained road identified as "private road" on the maps.
 - b. Pole P13 should either be eliminated or set and maintained by helicopter. If eliminating this pole results in additional impacts due to the placement of larger poles at P11 and P12, then this should be evaluated and discussed in the DEIR/DEIS.
 - c. Eliminate the alignment along poles P1, P2, and P3. Instead, connect in a straight line from P4 to P278724. This will avoid impacts to wetlands and riparian areas.
 - d. Poles P4, P5, & P6 should be moved closer to the edge of the existing road to reduce impacts and increase ease of maintenance.

Public Utilities Department

525 B Street, Suite 300, MS 906 • San Diego, CA 92101-4409

Tel (619) 533-7595



- e. Move Pole P7 to the west side of the existing road to eliminate crossing the road twice, reduce impacts, and increase maintenance efficiency.
 - f. The entire area from pole P4 to pole P11 is known to be rich with cultural resources. This should be evaluated and disclosed in the DEIR/DEIS.
3. It is our understanding and observation that SDG&E does not maintain designated access routes to distribution lines. Field crews commonly use *ad hoc* routes of travel, which results in erosion problems, impacts to biological resources, or disturbance of cultural resources. This is not acceptable. The goal should be to minimize or eliminate *ad hoc* overland travel by establishing pre-determined travel routes. These pre-determined travel routes should be delineated by markers or signs [e.g. Carsonite markers], and the delineating markers should be maintained on a regular basis.

The above issues should be addressed in the DEIR/DEIS in addition to those comments in our letter dated November 5, 2013. Please send a copy of this document to our office for review and comment.

If you have any questions, please contact me at jpasek@sandiego.gov or at (619) 533-7599.

Sincerely,



Jeffery Pasek
Watershed Manager

cc: Lisa Orsaba, California PUC
Bob Hawkins, US Forest Service
Dave Martens, Property Agent, Real Estate Assets Department
John Porteous, Project Manager, Dudek and Associates
Rebecca Jiles, Regulatory Specialist, SDG&E
Molly Dana, Property Agent, SDG&E
Megan Hamilton, Group Program Manager, County Department of Parks and Recreation

Devin Brookhart

From: Santos, Remedios <RPSantos@semprautilities.com>
Sent: Friday, March 07, 2014 3:39 PM
To: CNFMSUP; lisa.orsaba@cpuc.ca.gov; John Porteous; Rica Nitka; ktaylor02@fs.fed.us; rhhawkins@fs.fed.us; dshobbs@fs.fed.us
Cc: Giles, Rebecca; Central Files; Knowd, Tim M.; Trial, Allen; de Llanos, Estela; Fred Bauermeister (fbauermeister@insigniaenv.com)
Subject: SDG&E Master Permit
Attachments: A.12-10-009 CNF SDG&E Master Permit - NOP Comment Let 03-07-14.pdf

Sent on Behalf of Tim Knowd:

Attached please find San Diego Gas and Electric Company (SDG&E) Comments on the Notice of Preparation (NOP) for the SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects Environmental Impact Report/Environmental Impact Statement (EIR/EIS). (Application No. A.12-10-009).

For questions on the attached Comments, please contact:

Tim Knowd
Project Manager
Transmission & Distribution Projects
8315 Century Park Court
CP21E
San Diego, CA 92123-1530
Tel: 858.637.7930
TKnowd@SempraUtilities.com

Remedios P. Santos
Regulatory Case Analyst
SDG&E
Tel#: (858) 654-1852
Email: RPSantos@semprautilities.com



Tim Knowd
Project Manager
Transmission & Distribution Projects
8315 Century Park Court
CP21E
San Diego, CA 92123-1530
Tel: 858.637.7930
TKnowd@SempraUtilities.com

March 7, 2014

Ms. Lisa Orsaba
CPUC-Energy Division/
Mr. Will Metz, United States Forest Supervisor
Cleveland National Forest c/o Dudek
605 Third Avenue
Encinitas, CA 92024

Subject: San Diego Gas and Electric Company (SDG&E) Comments on the Notice of Preparation (NOP) for the SDG&E Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects Environmental Impact Report / Environmental Impact Statement (EIR/EIS). (Application No. A.12-10-009)

Dear Ms. Orsaba and Mr. Metz:

SDG&E appreciates the opportunity to provide comments on the scope of the EIR/EIS for the Cleveland National Forest Powerline Replacement Projects (Project). As you know, SDG&E submitted the application for the PTC along with a preliminary Plan of Development (POD) in October 2012. A revised POD and amended application were submitted in April 2013. This application includes SDG&E's proposal to fire-harden five existing 69kV power lines, including TL 626, in their existing alignment. The application was deemed complete in August 2013. Since that time, the United States Forest Service (USFS) and California Public Utilities Commission's (CPUC) consultant Dudek have worked at developing additional alternatives, including alternatives to the existing TL 626.

At the request of the USFS and CPUC, SDG&E has worked to identify an alternate study corridor that would be potentially feasible to relocate a segment of TL 626. We understand this request is in response to the USFS Southern California National Forests Land Management Plan Amendment (LMPA), which could change the current land use, including TL 626 and associated access roads, to a land use category designated Recommended Wilderness. SDG&E strongly objects to any proposal to designate Recommended Wilderness over important pre-existing infrastructure such as TL 626 (including the access roads and the 69 kV power line structures, wires and other ancillary facilities). SDG&E expressed its concerns during the LMPA process and in response to the Final Supplemental Environmental Impact Statement for the LMPA, which presented a new Preferred Alternative (2a) that extended the boundaries of proposed Recommended Wilderness over the existing power line. SDG&E will file an objection to the Draft Record of Decision for the LMPA, which identifies Alternative 2a as the Preferred Alternative.

TL 626 currently serves as very important backbone infrastructure for electric customers located in eastern San Diego County. It is the only north-south electric transmission connection in the east county and has been an important link to providing electric service for east county residents for many decades. In light of USFS' draft proposal to expand the Recommended Wilderness designation in the LMPA process and the public

concerns raised about relocating a segment of TL 626, SDG&E requests that the alternatives analysis contained in the EIR / EIS evaluate the feasibility and impacts of a Project alternative that would remove TL 626 from service. As described below, SDG&E has identified system improvements that would be required in order to potentially allow TL 626 to be removed from service, after further more detailed assessment of this potential alternative, including the impact on grid operations and electrical service reliability to SDG&E customers. This material and any views expressed herein are provided for informational purposes only and should not be construed in any way as an endorsement or inducement by SDG&E to select or construct the alternative. It is essential that any evaluation of potentially removing TL 626 from service consider how to mitigate impacts to the loss of this line. These impacts would include, but not be limited to, losses related to electric system reliability as well as current and future operational flexibility.

The EIR / EIS should evaluate the feasibility of removing TL 626

Faced with the potential of not being able to reconstruct TL 626 in its existing location and the potentially prohibitive expense and environmental impacts of relocating a segment of the line in a new and undisturbed corridor east of the national forest boundary, SDG&E would ask that the CPUC and USFS consider the following components of the "Remove TL 626 from Service Alternative" in the Draft EIR / EIS.

1. Remove TL 626 from Service. TL 626 is one of five 69kV power lines currently being proposed to be rebuilt from wood to steel in the CNF MSUP / PTC Powerline Replacement Projects. It is an 18.9 mile power line connecting Descanso, Boulder Creek and Santa Ysabel Substations and also currently provides service to a single radially fed distribution customer at Boulder Creek.
2. Construct additional system enhancements that would provide for safe customer electric service, operational flexibility and system reliability.
 - a. Upgrade the existing 69kV power line, TL 6931, to supply the customer load pocket from Boulevard substation, and/or
 - b. Loop-in the modified TL 625 between Loveland-Barrett into Suncrest Substation, install a 230/69 kV Class 70 transformer bank and install a 69 kV substation rack, establishing a new 69 kV source.
 - c. Develop an alternative source for the customer at Boulder Creek substation.
 - i. Convert the ST-BC section of TL 626 from 69kV to 12kV distribution, or
 - ii. Install an off-grid solution, such as solar panel/battery storage combination capable of serving the approximately 35 kW load at Boulder Creek.

Again, SDG&E appreciates the opportunity to comment on the scope of the Draft EIR/EIS and we look forward to continuing to work with you on this very important project.

Sincerely,



Tim Knowd

cc: Allen Trial – SDG&E
Estela de Llanos – SDG&E
Central Files - SDG&E
Fred Bauermeister – Insignia
Rica Nitka - Dudek

John Porteous – Dudek
Bob Hawkins – US Forest Service
Debbie Hobbs – Cleveland National Forest, USFS
Kelli Taylor - Cleveland National Forest, USFS