

SDG&E Response
Cleveland National Forest Power Line Replacement Projects
Notice to Proceed #001 Data Request 01, Dated August 15, 2016

**CLARIFICATIONS ON NTP ATTACHMENT A: NTP #1 COMPONENTS MAP
TL625B/TL629E**

CPUC Question #1

Attachment A: NTP # 1 Components Map TL625B Map 11 of 12, Page 17 of the NTP Request shows road, stringing sites, and pole top activities for TL 625D. Please clarify if this map was included in error, as activities along the TL 625D do not appear to be requested in NTP #1.

San Diego Gas & Electric Company (SDG&E) Response:

Pole top work will be necessary at Pole Z105012, located adjacent to the Barrett Substation along transmission line (TL) 625D, for rebuilding the TL625B component. The final conductor phasing of the rebuilt TL625B will be different than the existing phasing of TL625B. In order to accomplish the change in phasing crews will “roll” (reorientation of phase conductors) the phasing of the conductors inside the Barrett Substation and the first span outside of the substation (Pole Z105012). This will allow for the final phasing of TL625B independently of rebuilding TL625D which is not scheduled for construction until 2017

The stringing site displayed on Attachment A: NTP #1 Components Map, TL625B Map 11 of 12, will not be utilized during the required pole top work at Z105012 or any other work associated with NTP Request #1. The pole will be accessed via the existing SDG&E access road to the Barrett Substation off of Manzanita Road. No ground disturbance will occur as part of the conductor work associated with Pole Z105012. As part of the preconstruction notification requirements for NTP Request #1, notification mailers were sent to property owners within 1,000 feet of this Pole Z105012, per the approved Construction Notification Plan (Mitigation Measure (MM) LU-1).

CPUC Question #2, Bullet #1

The following clarifications regarding **ROADS** identified in the NTP Request are requested:

- NTP #1, Attachment A identifies three types of access roads: Construction-only, Maintenance, and Navigation. Please explain the differences between these types of roads and use and similarly, clarify if improvements or maintenance are associated with specific road types/are proposed under NTP #1.

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SDG&E Response:

SDG&E's access roads are classified into the following three categories according to when the road is intended to be used:

- 1) **Construction-Only:** These roads are intended to be used solely during construction of the project and, depending on local site conditions, may require improvement or repair prior to or during construction. SDG&E does not currently anticipate requiring the use of these roads for operation and maintenance activities following construction completion.
- 2) **Maintenance:** These roads are currently maintained by SDG&E and are intended to be used during construction for various activities such as ingress and egress and as part of the work areas including material lay down, stringing sites, and external load pick-up locations as well as throughout the operation and maintenance phase of the Project. Depending on local site conditions, improvement or repair of these roads may be required prior to, during, or following construction as described in Section 4.6 Access Road Modification of SDG&E's April 2013 Revised Plan of Development and in Section B.5 in the Final Environmental Impact Report/ Final Environmental Impact Statement (FEIR/FEIS). In addition, SDG&E's Transmission, Construction, and Maintenance Department will continue maintaining these roads as per standard practice. SDG&E Maintenance roads within the Cleveland National Forest will only be maintained for operation and maintenance if included in the pending USFS Master Special Use Permit (MSUP).
- 3) **Navigation:** This category includes both public and private roadways not maintained by SDG&E that are intended to be used for construction and/or operation and maintenance of the Project for activities such as ingress and egress, and as part of the work areas including material lay down, stringing sites, and external load pick-up locations. This category also includes identified overland travel routes intended to be used during construction only. However, there are no Navigation roads that are overland travel routes within the Cleveland National Forest and included in the MSUP. No improvement, repair, or maintenance of these roads and routes will be conducted as part of the Project.

CPUC Question #2, Bullet #2

- NTP #1, Attachment A identifies new roads (either construction, maintenance, or navigation) not previously identified in the TL 625 and TL 629 map books dated 4-29-15. Please clarify how the Final EIR/EIS evaluated use of these newly identified roads.

SDG&E Response:

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SDG&E continues to refine the Project’s dataset in preparation for construction, additional Navigation roads have been incorporated into the dataset to provide potential alternative routes during construction and allow for in-field flexibility. As stated in the response to CPUC Question #2, Bullet #1, Navigation roads are not improved, repaired, or maintained by SDG&E and serve to provide travel ways to and from the project’s work locations and temporary staging of vehicles; most are public roadways. Described in Section 2 Purpose and Need of SDG&E’s April 2013 Plan of Development, “SDG&E has designed the Proposed Action to minimize electric line relocations and the potential environmental impacts and safety risks that may arise from such relocations—by maximizing the use of existing roads and facility corridors.” Additionally, Pages B-45 and B-46 of Section B.5 Project Construction of the Final EIR/EIS discusses how staging areas, fly yards, and trench work areas “would be accessed using public roadways and existing access roads.”

CPUC Question #2, Bullet #3

- Clarify which roads identified in NTP #1 are SDG&E exclusive use roads. If none exist for TL 625B and TL 629E, please state this.

SDG&E Response:

In the context of this Project, SDG&E Exclusive Use Roads classification pertain solely to roads that currently exist on USFS managed lands and as described in the Final EIR/EIS (pages D.14-8-D.14-9). SDG&E Exclusive Use Roads are described as follows:

“For decades SDG&E has regularly maintained a network of approximately 30 miles of existing access roads, spur roads, and turnarounds within the CNF to support and provide access to its existing 69-kilovolt (kV) power lines, as well as approximately 15.6 miles of access roads to support existing 12 kV distribution lines within the CNF. Based on recent updates to the Forest Service route inventory, SDG&E also used an additional 5.5 miles of road within the CNF in the past and either abandoned those roads or converted them to foot trails. SDG&E also regularly maintains a network of approximately 0.9 mile of existing access roads, spur roads, and turnarounds to support and provide access to the existing 69 kV power lines extending outside of Forest Service-administered lands, as well as a network of approximately 0.7 mile of existing access roads, spur roads, and turnarounds to support and provide access to the existing 12 kV distribution lines extending outside of Forest Service-administered lands. The access roads provide connectivity between established local and regional roadways and electric line ROW areas. Spur roads provide access to pole locations and other equipment where facilities are located away from access road locations. Turnarounds are extended vehicle use areas that provide maneuverable space for work vehicles. These roads and turnarounds may contain paved, gravel, or unpaved earth surfaces (SDG&E 2013a).”

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There are no exclusive use access roads associated with TL625B.

Along TL629E, one section of road, from just west of Pole Z44162 to just east of Pole Z44180, has been classified as exclusive use by the USFS.

CPUC Question #2, Bullet #4

- NTP #1, Attachment A, Page 11 (Attachment A: NTP #1 Components Map TL625B Map 5 of 12) shows temporary and permanent road disturbance adjacent to Z272867. This was not identified in the corresponding 4-29-15 TL 652 map book, Page 9. Please quantify this acreage and habitat impacts.

SDG&E Response:

The proposed location of Pole Z272867 has not changed since the submittal of the April 29, 2015 map books. However, during constructability reviews conducted in 2015 and 2016, it was determined that the proposed location of fire-hardened Pole Z272867 will restrict access along the existing access road to poles further to the east, including Z272868 and Z272869. Therefore, a minor realignment of the road at Pole Z272867 is required to maintain access to the two poles located to the east along the existing access road. Approximately 0.02 acre of existing road and 0.09 acre of southern mixed chaparral will be temporarily impacted to realign the road around Pole Z272867. In addition, approximately 0.02 of southern mixed chaparral will be permanently impacted for the road realignment.

CPUC Question #3, Bullet #1

The following clarifications regarding **POLE** activities identified in NTP #1 are requested:

- Numerous labels (R, S, N), and in some cases, pole locations in NTP #1, Attachment A do not correspond to the 4-29-15 map books for TL 625 and 629. Please revise the NTP request accordingly, or provide rationale for each pole showing a different label or location.

SDG&E Response:

The changes in pole labels and locations are a result of constructability reviews for TL 625B and TL 629E conducted in 2015 and 2016 that updated the preliminary alignment presented in the Final EIR/EIS and the April 29, 2015 map books. As the Project has continued to develop, SDG&E has updated and refined the engineering design to include specific input regarding construction methodology. As a result, changes to the pole locations and labels are needed to facilitate alignment and engineering needs. The following is a list of the poles that have changed and the rationale behind each change:

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TL625B

1. NTP Request #1 Map 1 of 12. Pole Z30610 was mislabeled in the April 29, 2015 map books as a transmission structure to be replaced. P30610 is an existing distribution pole and will be removed during construction.
2. NTP Request #1 Map 1 of 12. Pole Z272840 Removal was added to the NTP Request #1 maps for ease of locating it in the field (the replacement structure is approximately 200 feet west of the current location). The current Pole Z272840 will be removed. The location of the replacement Pole Z272840 remains consistent with the April 29, 2015 map books.
3. NTP Request #1 Map 2 of 12. Pole P273066 was labeled as “new” in the April 29, 2015 map books. Attachment A of NTP Request #1 correctly labels Pole P273066 as a replacement of an existing 12 kV interset pole.
4. NTP Request #1 Map 7 of 12. Pole P675321 was labeled as “new” in the April 29, 2015 map books. Attachment A of NTP Request #1 correctly labels Pole P675321 as a replacement of an existing 12 kV interset pole.
5. NTP Request #1 Map 8 of 12. Pole Z272888 was depicted as a removal and a replacement in the April 29, 2015 map books, but just the replacement location was shown on the NTP Request #1 maps. The same activities (removal of the old pole and the installation of the new pole) will occur. The replacement location remains consistent with the April 29, 2015 map books.
6. NTP Request #1 Map 8 of 12. Pole Z272889 was depicted as a removal and a replacement in the April 29, 2015 map books, but just the replacement location was shown on the NTP Request #1 maps. The same activities (removal of the old pole and the installation of the new pole) will occur. The replacement location remains consistent with the April 29, 2015 map books.
7. NTP Request #1 Map 10 of 12. Pole Z571416 will no longer be replaced as part of TL625B but will be replaced as part of the rebuilding of TL625D, so it was not displayed on the NTP Request #1 maps.

TL629E

1. NTP Request #1 Map 1 of 13. Poles Z40571 and P192946 will no longer be replaced as part of TL629E work; instead, they will be replaced as part of TL629C work. However, pole top work will occur at these two locations, as depicted in the NTP Request #1 maps.

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2. NTP Request #1 Map 9 of 13. Pole P199313S will no longer be required based on constructability reviews and will be removed as depicted on the NTP Request #1 maps. The April 29, 2015 map books did not show any work at this location.
3. NTP Request #1 Map 9-13 of 13. Poles P40845/P40846, P40847, P40848, P40849, P40859, P40860, P40861, P40862, P190371, P41025, P41026, P41027, P41028, P41029, P4100073, P41030, P41031, P41032, P190481, P190480, P190479, P174084S are no longer required because of the approved 12 kV underbuild design of the fire-hardened TL629E. However, due to extended correspondence with the Campo Tribe regarding the relocation of the existing 12 kV to the rebuilt TL629E, these poles were not identified for removal in the April 29, 2015 map book. Since the time of the April 29, 2015 map book submittal, resolution with the Campo Tribe has been achieved and the Tribe and SDG&E agreed to remove all of the old distribution poles associated with the underbuild design. Please note that the poles will not be removed until the communication line (AT&T) is transferred to the rebuilt TL629E (per MM PSU-1).
4. NTP Request #1 Map 11 of 13. Pole 165714 will be a wood-to-steel replacement of a distribution pole in order to maintain safe service to the customer after the fire-hardening of TL629E. The April 29, 2015 map books depicted no action at this location.
5. NTP Request #1 Map 13 of 13. Pole Z100035 is the same pole as Pole Z44234 in the April 29, 2015 map books. The number of the pole was changed when it was replaced as part of normal operation and maintenance. The pole action (replacement) has not changed since the April 29, 2015 map books.

CPUC Question #3, Bullet #2

- Please describe the “Pole Top Only” locations shown in NTP #1, Attachment A and activities associated with these locations. These activities are not identified as such in the 4-29-15 map books. Also, please describe these activities in relation to the Final EIR/EIS and explain the type of impacts associated with this work (i.e. if no impacts occur, please explain why).

SDG&E Response:

Pole top work will be necessary on all distribution tap poles that are being fed from the underbuilt distribution system, which is collocated within the existing transmission right-of-way. The work being conducted on the transmission structures (fire-hardening) will ultimately affect the conductor that serves the distribution taps. New conductor will be required to be placed between the fire-hardened transmission structures and the first distribution tap pole. Crews will need access to these structures and their pole tops to install any new hardware associated with the

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conductor replacement, install new conductor, and maintain the distribution system, which serves the local customers load.

Extra stringing sites and access roads will be not required as the construction crew will be walking to and climbing each pole to complete the activities rather than using large, heavy equipment. The potential construction and installation of additional facilities is described on Page B-10 of Section 3.1.1 Installation of Other Facilities in the Final EIR/EIS, as follows:

“In addition to the replacement steel poles and conductors, SDG&E may install all necessary and proper guys, anchorage, crossarms and braces, and other fixtures for use in connection therewith, including but not limited to, ancillary facilities such as pole- or pad-mounted transformers and other equipment needed to effectively support and enable electric transmission and distribution across the system.”

No additional impacts will occur as a result of these activities because they will be taking place on top of existing poles and will not be disturbing the ground adjacent to or surrounding the poles. Additionally, the majority of the “Pole Top Only” locations are previously disturbed areas. Activities associated with these pole top only locations will occur in the same manner as described in the Final EIR/EIS for construction, operation, and maintenance of the Project.

CPUC Question #3, Bullet #3

- Please explain how pole topping activities along TL629C, and TL629D have met pre-construction requirements (e.g. landowner notification) as applicable.

SDG&E Response:

The locations of the “pole top only” work areas were included within the resource surveys conducted in 2010, 2015, and 2016. All sensitive resources identified by the resource surveys will be flagged and fenced for avoidance, per MMs BIO-10, BIO-14, BIO-16, and CUL-3, as a preemptive protective measure although crews will be walking to and climbing the poles for this work eliminating the chance of any ground disturbance. The notification mailers were sent to property owners within 1,000 feet of each pole where pole topping activities will be occurring, per the approved Construction Notification Plan (MM LU-1). Additionally, all other Plans that have been approved will be implemented, as necessary, immediately prior to and during construction at these locations.

CPUC Question #4

The following clarification regarding **GUARD STRUCTURES** identified in NTP#1 is being requested:

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- Please explain if guard structures are proposed along TL 625B and TL 629E alignments, as they are included in the 4-29-15 map books.

SDG&E Response:

Guard structures, bucket trucks or temporary wooden structures, will be placed prior to stringing new conductor at all locations where the conductor crosses public and private roads that will not be closed during stringing activities. The locations of the guard structures are depicted on the Work Space and Sensitive Resource Maps that will be submitted as part of pre-construction compliance documentation.

CPUC Question #5, Bullet #1

The following clarifications regarding **STAGING AREAS** identified in the NTP Request are being requested:

- Please quantify acreages habitat disturbance by type associated with the staging areas compared with previous anticipated acreages. Please confirm that all staging areas were previously identified in the 4-29-15 map book set.

SDG&E Response:

During the constructability reviews conducted in 2015 and 2016, it was determined that several of the yards previously identified in the April 29, 2015 map books could no longer be used due to landowner requests or access and safety concerns. Therefore, the yards were removed from NTP Request #1. In addition, a few of the yards identified in NTP Request #1 needed to be realigned slightly to allow safe access or to maximize the use of disturbed areas. The Sweetwater Staging Yard (approximately 0.7 acre) and the Kitchen Creek Staging Yard (approximately 0.92 acre) have not changed in size or shape since the April 29, 2015 map books. Since the April 29, 2015 map books, the Anderson Staging Yard was shifted slightly to the north to allow for safer access; however, it has not changed in size and will remain 4.48 acres. Since the April 29, 2015 map books, the Japatul Spur Staging Yard was slightly reconfigured, per the landowner request, which resulted in a slight increase in size from 3.02 acres to 3.07 acres. The increase in size will result in an increase of 0.05 acre of temporary impacts to ruderal/barren areas. Since the April 29, 2015 map books, the Merrigan Staging Yard was reconfigured in order to utilize the current fenced-in developed area. The size of this staging yard was increased from 2.78 acres to 3.19 acres; however, since the currently developed area partially overlaps the staging yard identified in the April 29, 2015 map books, there would be a reduction in temporary impacts to agricultural lands by utilizing the currently developed area.

All five yards requested in the NTP Request #1 were included in the April 29, 2015 map books, as detailed in the following:

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- The Sweetwater Staging Yard was depicted as a stringing site (see SDG&E response to Question #5, Bullet #2 below for clarification) on Attachment B.1 TL625 Route Map 6 of 56.
- The Anderson Staging Yard was depicted on Attachment B.1 TL629 Route Map 33 and 34 of 73. The Kitchen Creek Staging Yard was depicted on Attachment B.1 TL629 Map 41 of 73.
- The Japatul Spur Staging Yard was depicted on Attachment B.1 TL625 Route Map 33 and 34 of 56.
- The Merrigan Yard (this is currently a developed staging yard) was depicted on Attachment B.1 TL629 Route Map 7 of 73.

CPUC Question #5, Bullet #2

- The Sweetwater Staging Area (NTP #1, Attachment A, page 10) was previously shown as a stringing site in the 4-29-15 map book (page 6, TL 625). Please clarify the impact differences.

SDG&E Response:

Within the dataset associated with the April 29, 2015 map books, the developed, graveled parking lot at the Loveland Reservoir was mislabeled as a stringing site and was always intended to be used as a staging area. This site is located over 500 feet from the alignment, and therefore is infeasible to be used as a stringing site due to the extreme angle and distance from the ROW. No additional impacts to sensitive resources or vegetation will occur as a result of the parking lot being utilized as a staging area as intended.

CPUC Question #5, Bullet #3

- The Merrigan Staging Area and Anderson Staging Area are along alignments TL 629A and TL 629C. Please describe how SDG&E has satisfied pre-construction requirements for these areas (i.e. surveys, public notification, etc.), as they are outside TL 625B and TL 629E.

SDG&E Response:

Project staging areas were included within the Project environmental analysis and resource surveys, as required. No sensitive resources have been identified by the resource surveys at the Merrigan Staging Area and Anderson Staging Area. These sites are characterized as cultivated agriculture in the environmental analysis. They are not identified as requiring additional pre-construction surveys under MM BIO-13, MM BIO-17, MM BIO-31, MM BIO-33. All other pre-

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construction requirements, such as the pre-construction survey verification study in compliance with the Natural Community Conservation Plan (NCCP) protocol, will be implemented. The notification mailers were sent to property owners within 1,000 feet of all five staging yards associated with NTP Request #1, per the approved Construction Notification Plan (MM LU-1). Additionally, all other Plans that have been approved will be implemented, as necessary, immediately prior to and during construction at these locations.

Question #6

The following clarifications regarding STRINGING SITES identified in the NTP Request are being requested:

- SDG&E states in the NTP#1 Request: “Due to changes in site conditions and to facilitate constructability, some of the stringing site and yard boundaries were refined relative to the last Geographic Information System data set submittal in February 2015 in response to CPUC Data Request #9.” In its review of the NTP #1 Attachment A, CPUC has found numerous additional, modified, or eliminated stringing sites proposed in and not previously identified in the 4-29-15 map book. Because of this, CPUC requests that SDG&E provide revised maps showing 1) the extent of the biological and cultural survey area for the Project, 2) a quantification of temporary disturbance compared to that of the Final EIR/EIS, and 3) a quantification of impacts by habitat type in relation to the Final EIR/EIS.

SDG&E Response:

Since the time of the initial NTP Request #1 submittal, SDG&E’s primary contractor, Crux Subsurface, Inc/PAR Electric, has become fully integrated into the Project and has developed a specific stringing plan for TL 625B and TL 629E that identified stringing sites that are necessary to conduct the rebuilding of the powerlines. As depicted on the provided Work Space and Sensitive Resource Maps for TL 625B and TL 629E and the TL 625B and TL 629E Compare Maps, several of the stringing sites (approximately 30) have been removed from the NTP Request #1 Attachment A Maps and the April 29, 2015 map books, based on the Crux stringing plan. Please note that all developed access roads identified on the Work Space and Sensitive Resource Maps for TL 625B and TL 629E will be utilized for construction activities, including, but not limited to parking, staging materials and equipment, vehicle turn arounds, and stringing operations. The attached Survey Area Maps depict the survey area for cultural and biological resources for the surveys conducted for the Project from 2010 through 2016. The temporary impacts identified in the FEIR/EIS (based on the April 2015 Data Request Response) for stringing sites included 0.98 acre to native habitat, 0.24 acre to non-native grasslands, and 3.33 acres to agricultural/disturbed/developed areas. The revised stringing sites depicted on the Work Space and Sensitive Resource Maps have 0.72 acre of temporary impacts to native vegetation,

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0.23 acre of temporary impacts to nonnative grasslands, and 0.75 acre of temporary impacts to agricultural/disturbed/developed areas. The temporary impacts identified in the FEIR/EIS for pole work areas included 3.9 acres to native habitat, 0.19 acre to non-native grasslands, and 0.63 acre to agricultural/disturbed/developed areas. The delineated work spaces depicted on the Work Space and Sensitive Resource Maps have 2.98 acres of temporary impacts to native vegetation, 0.175 acre of temporary impacts to nonnative grasslands, and 0.49 acre of temporary impacts to agricultural/disturbed/developed areas, not including bare ground and existing access roads that will be utilized for construction.