

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



Ms. Rebecca Giles
Regulatory Case Administrator
San Diego Gas & Electric
(via email: RGiles@semprautilities.com)

May 8, 2015

Subject: San Diego Gas & Electric Company – Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects, PTC Application No. 12.10.009 – Data Request No. 11

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) and United States Forest Service (Forest Service) reviewed the San Diego Gas & Electric (SDG&E) response dated May 1, 2015, to Data Request No.10 (DR10) dated February 27, 2015, and supporting geographic information system (GIS) data provided. Based on information provided in response to DR10 and the GIS data, the CPUC and Forest Service have identified additional information required in order to complete preparation of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects (see Attachment A). Note that where there are minor discrepancies between the DR10 Exhibit A and Exhibit B tables and the GIS data provided by SDG&E, the Final EIR/EIS will reflect the data provided in the GIS data set.

Your response to this data request is requested by **Friday, May15, 2015**.

If you have any questions or need additional information, please contact me at 415.703.1966 or lisa.orsaba@cpuc.ca.gov.

Sincerely,

MJ Orsaba

Lisa Orsaba, Project Manager
Energy Division, California Public Utilities Commission

cc: *Tim Knowd, SDG&E (TKnowd@semprautilities.com)*
Robert Hawkins, US Forest Service (rhhawkins@fs.fed.us)
Jeff Heys, US Forest Service (jaheys@fs.fed.us)
John Porteous, Dudek (jporteous@dudek.com)

ATTACHMENT A
Data Request No. 11 – May 8, 2015
Application No. A.12-10-009
SDG&E Master Special Use Permit and
Permit to Construct Power Line Replacement Projects

1.0 PROJECT DESCRIPTION

DR10 Exhibit A Tables (DR10 Question 1 (Q1))

1. Please indicate how many weathered steel poles are associated with C78 (Table B-2).
2. Please clarify the following discrepancies in Table B-7 with the GIS data provided with DR10. If changes to Table B-7 are necessary, please provide a corrected version of Exhibit A Table B-7 (please only show changes between Draft EIR/EIS text and new text in final table submitted).
 - TL682
 - Guard structures, GIS indicates 4 within the Cleveland National Forest (CNF) (table indicates 14).
 - TL626
 - “Fly yard” text is deleted under “Work Area Type” column; however, data inserted shows one site within CNF. Based on GIS data provided, this site is located outside CNF. This fly yard is located east of Pole Z372116.
 - TL629
 - Removal, GIS data includes two removal areas that occur outside of CNF (table indicates six).
 - TL6923
 - GIS doesn’t contain data for removal areas for this line (table indicates four).

2.0 BIOLOGICAL RESOURCES

DR10 Exhibit B – Question 3 (Q3)

3. Tables D.4-5 and D.4-6 (Exhibit B in DR10) provide temporary and permanent impact acreages to vegetation communities and land cover types. Under land cover types, GIS vegetation data is separated into three categories: disturbed (ruderal/barren), pastureland/cultivated agriculture, and urban and developed/ornamental landscaping. During consultation meetings in early 2015 with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service (the Wildlife Agencies), the Wildlife Agencies expressed concern that areas designated as ruderal or pastureland may include suitable habitat for special-status species. Therefore, please provide clarification and detailed information on how many acres of the “disturbed (ruderal/barren)” and “pastureland/cultivated agriculture”

ATTACHMENT A
Data Request 11

**SDG&E Master Special Use Permit and Permit to Construct
Power Line Replacement Projects**

categories are considered habitat by the Wildlife Agencies, which would consequently count as “take” under SDG&E’s Subregional NCCP. If impacted acreage differs (i.e., some is considered habitat and some is not) in these two categories from the information submitted on May 1, 2015, please clearly indicate the acreage considered habitat vs. not-habitat in Tables D.4-5 and D.4-6. If Table D.4-5 and Table D.4-6 acres are revised based on Wildlife Agencies’ discussions, please provide an updated GIS vegetation layer clearly showing which areas previously considered disturbed (ruderal/barren) and pastureland/cultivated agriculture are now considered “habitat.”

4. DR10 Q3 requested the following information “...please provide temporary and permanent impacts acreages for the newly proposed work areas shown in Exhibit C by habitat type (i.e., vegetation community, land cover type, *wetland resources*, and *jurisdictional resources*), as well as *biological resources that are known to occur in the newly proposed work areas (i.e., USFWS designated critical habitat and known occurrences of special-status species)*.” SDG&E’s response indicated that information was available in the updated proposed project GIS database. However, the GIS data only provides the vegetation data and no information regarding the items in italics above. Please state whether or not any items in italics above occur on the newly proposed work areas. If yes, please provide specifics and a statement on which databases were reviewed. If not, please provide a statement on which databases were reviewed to determine if the items in italics do not occur in the newly proposed work areas.
5. Table D.4-10 (Exhibit B in DR10) shows < 0.01 acre of temporary and/or permanent impact acreages to U.S. Army Corps of Engineers-jurisdictional waters for the following project lines: C78, C157, C442, C440, and C449. Please clarify where these impacts to ephemeral drainages occur along these lines. Please include the pole numbers where impacts occur.

Natural Community Conservation Plan (NCCP)

6. Per CPUC Energy Division Director Edward Randolph’s letter dated May 4, 2015, to SDG&E Vice President, Dan Skopec, the CPUC CNF PTC Final EIR/EIS will rely on SDG&E compliance with the current NCCP based on CPUC and Forest Service current understanding that sufficient take authorization (quantified as acres of impacted habitat) is available for this project. Please provide the total acreage available in the NCCP and confirm that the overall total “take” acreage that remains in the SDG&E NCCP is sufficient for the incidental take of covered species anticipated for the CNF MSUP/PTC.