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ADMINISTRATIVE

Question #1

The Preliminary Plan of Development (POD) does not provide the following:

- 1) Agency and public involvement contacts and correspondence to date, including names, addresses, phone numbers, and e-mail addresses.
- 2) An Excel spreadsheet that includes all parcels within 300 feet of any project component with the following data: assessor parcel number (APN), owner mailing address, and parcels' physical addresses. In addition to property owners within and adjacent to the project, please list all other contacts.

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

- 1) Agency and public involvement contacts and correspondence to date, including all collected contact information, was previously provided in Appendix H: Listing of Governmental Agencies Consulted and Statement of Position of SDG&E's Permit to Construct (PTC) Application A. 12-10-009 submitted to the CPUC on October 17, 2012.
- 2) An Excel spreadsheet containing a list of all parcels within 300 feet of the Cleveland National Forest (CNF) Power Line Replacement Projects (Proposed Projects) with each parcel's APN and owner mailing address was provided in Appendix C: Service List and Public Review Locations for Notice of Application of SDG&E's PTC Application A. 12-10-009 (submitted to the CPUC on October 17, 2012) and is included as Service List and Public Review Locations for Notice of Applications at the location provided in Attachment A: Electronic File Directory. The parcels' physical addresses are not provided in the parcel data obtained from San Diego Geographic Information Source (SanGIS), so this information has not been included. An Excel spreadsheet containing the APNs and owner mailing addresses for parcels within 300 feet of the Proposed Projects is included as CNF Land Owner Notifications in the location provided in Attachment A: Electronic File Directory.

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GEOGRAPHIC INFORMATION SYSTEM (GIS) DATA REQUESTS

Question #1

Please include road information showing existing, new, and planned for improvement.

SDG&E Response:

All roads are existing; no new roads are currently anticipated to be constructed as part of the Proposed Projects. GIS data for all access roads within the CNF associated with the Proposed Projects is included as CNF_Exclusive_Access_Roads Shapefile in the location provided in Attachment B: GIS Data File Directory.

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CUMULATIVE PROJECTS

Question #1

Per the California Public Utilities Commission's (CPUC's) Information and Criteria List and Working Draft PEA Checklist for Transmission Line and Substation Projects (PEA checklist), please provide a list of past, present, and reasonably foreseeable future projects within the project area that SDG&E is involved in (i.e., transmission line 637). Also, please provide a list of projects that have the potential to be within the geographic scope and time frame to the proposed project.

SDG&E Response:

The following are past, present, and reasonably foreseeable future projects within the combined area of the Proposed Projects with which SDG&E is/was involved:

- Sunrise Powerlink Project
- 69 Kilovolt (kV) Power Line (TL) 637 Project

The following are projects that have the potential to be within the geographic scope and time frame of the Proposed Projects:

- Buckman Springs Road/Oak Drive Intersection Improvements Project
- Pine Valley Park Ballfields Project
- Kitchen Creek Helitanker Base Project

References

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San Diego County. Current Projects. Site visited August 18, 2011.

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PRELIMINARY ENVIRONMENTAL RESOURCE EVALUATION (SECTION 10 OF POD)

General Comments

Question #1

Please provide the same level of detail for the connected actions and similar actions scenarios as the proposed action.

SDG&E Response:

The Preliminary POD was prepared in support of SDG&E's application for a Master Special Use Permit (MSUP) with the USFS. Consequently, the Preliminary POD considers three action types (Proposed, Connected, and Similar) as defined under the National Environmental Policy Act (NEPA).

The Preliminary POD is organized to provide discussion applicable to the Proposed Action (i.e., the MSUP) first, as that is the action within the jurisdiction of the USFS, with Connected Action- and Similar Action-specific discussions following after. Detailed discussion regarding construction, operation, and maintenance activities; the potential impacts from these activities; and the proposed measures to reduce or eliminate these impacts was provided in the Proposed Action sections of the Preliminary POD. Where this information also applies to Connected Actions and Similar Actions, the discussion for those sections refers to what is provided in the preceding Proposed Action discussion and the text is not repeated. Where specific data or unique conditions exist for the Connected Actions or Similar Actions that differ from what is provided for the Proposed Action, those differences are discussed in the appropriate Connected Actions or Similar Actions sections of the Preliminary POD.

Question #2

Please provide supporting technical reports/data for resource sections (e.g., air quality, biological resources, cultural resources, noise).

SDG&E Response:

The following technical reports are included in the locations provided in Attachment A: Electronic File Directory:

- Biological Technical Report (BTR) for the San Diego Gas & Electric Company Electric Safety and Reliability Plan Project, San Diego County, California

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- Rare Plant Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project in the Cleveland National Forest and Surrounding Areas, San Diego County, California
- Arroyo Toad (*Anaxyrus californicus*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Coastal California Gnatcatcher (*Poliophtila californica californica*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Hermes Copper Butterfly (*Hermelycaena [lycaena] hermes*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Least Bell's Vireo (*Vireo bellii pusillus*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Quino Checkerspot Butterfly (*Euphydryas editha quino*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Stephens' Kangaroo Rat (*Dipodomys stephensi*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- California Spotted Owl (*Strix occidentalis occidentalis*) Habitat Assessment and Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Southern Willow Flycatcher (*Empidonax traillii extimus*) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California
- Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project – Confidential
- Cleveland National Forest Electric Safety and Reliability Project Technical Noise Study Report
- Report on ASTM Phase I Environmental Site Assessment, Cleveland National Forest Electric Safety and Reliability Project, San Diego County, California

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- Visual Resources Technical Study, Cleveland National Forest Electric Safety and Reliability Project

GIS data for resource sections were previously provided with the Preliminary POD. In addition, the following GIS data are included in the locations provided in Attachment B: GIS Data File Directory:

- CNF_Exclusive_Access_Roads Shapefile
- CNF_Viewpoint_Simulations Shapefile
- CNF_Viewpoint_Simulations KMZ file
- USFS_Scenic_Integrity Shapefile
- CDF_Land_Cover Shapefile
- CNDDDB_County_Clip Shapefile
- Critical_Habitat_within_Vicinity Shapefile
- Vegetation_Survey Shapefile
- ARTO_Survey_Results Shapefile
- CAGN_Survey_Results Shapefile
- CSOW_Survey_Results Shapefile
- Hermes_Buffered_Results Shapefile
- Hermes_Locations_Results Shapefile
- LBVI_Survey_Results Shapefile
- QCB_Observed Shapefile
- QCB_Plant_Survey_Results Shapefile
- Rare_Plant_Survey_Results Shapefile
- SWFL_Survey_Results Shapefile
- Arroyo_Toad Shapefile
- CA_Gnatcatcher Shapefile
- CA_Red_Legged_Frog Shapefile
- Laguna_Mountains_Skipper Shapefile
- Least_Bell_Vireo Shapefile
- QCB_Not_Suitable Shapefile
- QCB_USFWS_Occupied_Habitat Shapefile
- San_Bernardino_Bluegrass Shapefile
- San_Diego_Thornmint Shapefile
- Stephens_Kangaroo_Rat Shapefile
- Willow_Flycatcher_Suitable Shapefile

Question #3

Please provide a description of the physical environmental (environmental setting/baseline data) for each resource area in context of the local and regional environment.

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SDG&E Response:

A description of the physical environment for each resource area that was included in the Preliminary POD is provided in CNF Existing Conditions, an electronic version of which is included in the location provided in Attachment A: Electronic File Directory.

Question #4

Please provide a description of the federal, state, and local regulatory environment.

SDG&E Response:

A description of the applicable federal, state, and local regulations for each resource area that was included in the Preliminary POD is included as Existing Conditions as part of SDG&E's response to General Comments Question #3 in the location provided in Attachment A: Electronic File Directory.

Question #5

The PEA checklist indicates that detailed descriptions should be limited to those resource areas that may be subject to a potentially significant impact. At a minimum, please provide, in addition to those areas evaluated in the POD, an evaluation for agricultural resources; geology and soils, and hazards and hazardous materials. Also, please provide rationales for those resources not expected to need a detailed analysis (i.e., population and housing, public services, and utilities and service systems.

SDG&E Response:

As part of SDG&E's preliminary environmental evaluation for the Proposed Projects, all resource areas included for consideration under CEQA were assessed for potentially significant impacts. Following this evaluation, SDG&E determined that, based on currently available data and local site conditions, only those resource areas included in the Preliminary POD may be subject to a potentially significant impact and necessitate detailed descriptions. As a result, in accordance with the CPUC Information and Criteria List and CPUC Checklist, several resource areas were not examined in greater detail. These include Agriculture and Forestry; Geology, Soils, and Seismicity; Hazards and Hazardous Substances; Population and Housing; Public Services; and Utilities and Service Systems. The following sections describe more detailed rationales for each resource not requiring a detailed analysis.

Agriculture and Forestry

Evaluation of existing agricultural and forestry resources involved a review of the San Diego County General Plan and associated subregional and community plans; aerial photographs;

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and GIS data, including Department of Conservation (DOC) Division of Land Resource Protection (DLRP) Farmland Mapping and Monitoring Program (FMMP) data, Williamson Act data, California Department of Forestry and Fire Protection (CAL FIRE) land cover data, U.S. Department of Agriculture (USDA) USFS forest legacy program data, and San Diego County (County) zoning data. Field visits to the combined area of the Proposed Projects were also conducted to gather relevant information.

Combined, the five existing 69 kV power lines span a total of approximately 1.6 linear miles of Unique Farmland and 12 linear miles of Farmland of Local Importance, as defined by the DOC's FMMP. This represents approximately 13 percent of the approximately 104.7 miles of existing alignments for the Proposed Projects. Approximately 21 existing poles to be removed and replaced as a result of the Proposed Projects are located on Unique Farmland, and 176 poles are located on Farmland of Local Importance. These poles represent approximately 14.3 percent of the approximately 1,375 existing poles being removed and replaced as part of the Proposed Projects. Of the approximately 223,326 acres of Important Farmland in the County, approximately 39.8 acres (less than 0.01 percent)—1.4 acres of Prime Farmland, approximately 0.8 acre of Unique Farmland, and approximately 37.6 acres of Farmland of Local Importance—will be temporarily used during Proposed Projects construction. Of these 39.8 acres, approximately 37.2 acres (93 percent) is rangeland used for the production of confined livestock and is not currently producing crops. Further, approximately 21.8 acres, or 59 percent, of these lands are designated for temporary use by nine staging areas and two fly yards. Combined, the Proposed Projects will result in approximately 0.01 acre of permanent impacts within Unique Farmland and approximately 0.04 acre of permanent impacts within Farmland of Local Importance.

Combined, the five existing 69kV power lines also span a total of approximately 8.5 linear miles of land under Williamson Act contract, or approximately 8.1 percent of the approximately 104.7 miles of existing alignments for the Proposed Projects. Approximately 118 of the existing poles to be removed and replaced as a result of the Proposed Projects are located on lands under Williamson Act contract. This represents approximately 8.6 percent of the approximately 1,375 poles being replaced as a result of the Proposed Projects. The Proposed Projects will not conflict with any Williamson Act contracts because the Proposed Projects will not subdivide any parcels, will not result in any changes in contract status or ownership, and will not impact the viability of the lands under contract for agricultural use.

In addition, combined, the five existing 69 kV power lines span approximately 64.1 linear miles of land zoned for agricultural use, approximately 61.3 percent of the total 104.7 linear miles of existing 69 kV power lines. Approximately 781 of the existing poles to be removed and replaced as a result of the Proposed Projects are located on land zoned for agricultural

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use. This represents approximately 56.8 percent of the approximately 1,375 poles to be replaced as a result of the Proposed Projects. The Proposed Projects will replace existing utility lines with new utility lines in the same alignment and will not result in conflicts with agricultural zoning nor any change of existing land uses. In addition, utility lines and poles are an allowed use on land zoned General Agriculture and Limited Agriculture.

Combined, the five existing 69 kV lines span approximately 15.7 linear miles of forest land, including approximately 0.1 mile of lands designated as conifer forest, approximately 1.1 miles of lands designated as hardwood forest, and approximately 14.5 miles of lands designated as hardwood woodland. This represents approximately 15 percent of the approximately 104.7 linear miles of existing 69kV power lines. Reconstruction of existing electric facilities within forest lands will not remove additional forest land from forest uses. Four of the approximately 1,375 existing poles being removed and replaced with steel poles as part of the Proposed Projects are located in lands designated as conifer forest. Similarly, 17 existing poles in lands designated as hardwood forest and 203 existing poles in lands designated as hardwood woodland will be replaced as a result of the Proposed Projects. Construction activities will not remove these lands from forest uses. Lastly, the Proposed Projects do not cross land designated as timberland or timberland zoned Timber Production (as defined by California Government Code Section 51104(g)).

Geology, Soils, and Seismicity

The existing conditions and potential impacts associated with geologic hazards were obtained from a review of geologic literature relevant to the combined area of the Proposed Projects. This review included publications and data from the U.S. Geological Survey (USGS), the USDA Natural Resource Conservation Service (NRCS), and the California Geological Survey (CGS). Planning documents prepared by the County and the USFS for the CNF were also reviewed, and reconnaissance field investigations were performed. In addition, a geotechnical report was prepared by VO Engineering, Inc. for the majority of the 69 kV power lines included in the Proposed Projects. The report includes information for TL625, TL626, TL629A, TL682, and TL6923, but does not provide geologic information for TL629C, TL629D, or TL629E. Potential impacts associated with these segments of the Proposed Projects were determined based on a literature review and available GIS data. Further, SDG&E's existing operation and maintenance procedures currently implemented for the existing 69 kV power lines within and around the CNF were taken into consideration when assessing the potential impacts that may result from the operation and maintenance of the Proposed Projects.

The Proposed Projects are located in an area that may be subjected to relatively strong seismic shaking or fault rupture due to earthquakes that occur along the nearby faults. However, the new steel power line structures will be more structurally sound than the

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existing wood poles due to improved engineering characteristics, increased material strength, and improved design safety requirements. Preliminary engineering calculations performed for the Proposed Projects' Preliminary Siting Assessment concluded that forces resulting from seismic loading are less than forces generated by wind and broken conductor loading on structures. Therefore, seismic ground motion and fault rupture does not need to be independently considered for the design of SDG&E's 69 kV power line structures.

As described in the Preliminary POD, the average area of each stringing site measures approximately 0.4 acre, and the average pole work area measures less than 0.1 acre. Ground disturbance will also be required in limited areas for the installation of the new steel poles. Following the removal of existing poles and the installation of the new steel poles, disturbed areas will be returned to near pre-construction conditions using soil excavated on site, where possible, during construction activities. Therefore, ground disturbance will be limited and relatively small in any one location.

Lastly, according to data provided by the NRCS, there are no expansive soil types underlying the Proposed Projects' alignment. No soils underlying the Proposed Projects have greater than a low shrink-swell potential.

Hazards and Hazardous Substances

Analysis of existing hazards and hazardous materials involved a review of the Phase I Environmental Site Assessment conducted by Haley & Aldrich, Inc., for the Proposed Projects, the San Diego County General Plan and associated community and subregional plans, CAL FIRE data, and emergency evacuation and response plans and Office of Emergency Services websites for the County. The Phase I Environmental Site Assessment is included as Report on ASTM Phase I Environmental Site Assessment, Cleveland National Forest Electric Safety and Reliability Project, San Diego County, California as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory.

Only one hazardous materials site poses a potential risk to the Proposed Projects. This site is the Pine Valley Trailer Park located at 27521 and 27541 Old Highway 80 in Guatay, near TL629A, where a release of gasoline occurred from two 1,000-gallon underground storage tanks and impacted soil and groundwater. High-vacuum dual-phase extraction remediation was conducted at the site between 2004 and 2007, which removed more than 10,000 pounds of petroleum hydrocarbons from the site. Approximately 36 cubic yards of petroleum-impacted soil remains at the site; however, the soil is located south of Old Highway 80 and outside of the work areas for the Proposed Projects. As reported in the Phase I Environmental Site Assessment, groundwater was encountered between 15 and 20 feet below

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ground surface (bgs) at this site. In March 2010, maximum groundwater concentrations beneath Old Highway 80 were recorded as follows:

- Total petroleum hydrocarbons (TPH) gasoline = 9,500 micrograms per liter ($\mu\text{g/L}$)
- TPH diesel = 19,000 $\mu\text{g/L}$
- Benzene = 390 $\mu\text{g/L}$
- Toluene = 410 $\mu\text{g/L}$
- Ethylbenzene = 460 $\mu\text{g/L}$
- Xylenes = 1,790 $\mu\text{g/L}$

The exact location of the groundwater plume is unknown. Because the exact location of the groundwater plume is unknown, contaminants may have migrated north toward TL629A (between existing pole Z173105 and Z173109). Current engineering design for this area includes direct-bury steel poles set to a maximum depth of approximately 11 feet bgs. Because groundwater in the area is reported to be approximately 15 to 20 feet bgs, excavation activities for these poles are not anticipated to reach the groundwater table. In addition, no groundwater will be pumped or removed at these pole locations. Further, any spoils from pole installation will be used as backfill around the pole or spread around the pole site; as a result, no soil will leave the site for these poles. No other soil or groundwater contamination was identified at any of the component locations of the Proposed Projects.

The limited use of some hazardous materials typically associated with construction and operation and maintenance of power lines will occur for the Proposed Projects. However, no on-site storage or use of large quantities of any of these materials is anticipated. All activities will be conducted consistent with existing company standard operating procedures. These procedures are considered part of the baseline condition when evaluating the potential for impacts, and because all activities will be conducted similar to what is included in the baseline, no impact will occur.

The Proposed Projects are not within two miles of a public airport, and only two Proposed Projects—TL625 and TL6923—are within one mile of a private airstrip. Approximately 17 replacement poles will be constructed using helicopters within two miles of these areas. These poles will not be classified as an obstruction by the Federal Aviation Administration (FAA) because the airports do not meet the requirements of FAA Regulation, Part 77.9(d). Similarly, construction of the Proposed Projects will not directly impair an adopted emergency response or evacuation plan. Brief closures (approximately 10 to 15 minutes in duration) may be required while stringing or removing the conductors across Interstate (I-) 8, State Route (SR-) 76, SR-78, and SR-79; during the installation and removal of crossing structures, and where the line will be installed underground along TL629E. However, all roads are anticipated to remain accessible to emergency vehicles and for evacuation purposes during construction of the Proposed Projects.

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Population and Housing

Because the combined area of the Proposed Projects comprises a broadly dispersed set of mostly unincorporated areas within predominantly undeveloped lands throughout central San Diego County, data collection and analysis centered on trends within unincorporated areas in the County, including the Alpine, Central Mountain, Jamul-Dulzura, Julian, Mountain Empire, North Mountain, and Pala-Pauma Valley community planning areas. Demographic, housing, and economic data were obtained primarily from the San Diego Association of Governments (SANDAG), the primary regional planning agency for the San Diego area. Additional population and housing information was obtained from the U.S. Census Bureau's 2010 and 2000 data, the California Department of Finance population estimates, and the San Diego Convention and Visitors Bureau 2010 data on temporary housing.

Although some part-time employment of the local labor force may occur during construction of the Proposed Projects, the majority of crewmembers will commute from outside the vicinity of the Proposed Projects or reside temporarily at local lodging establishments. During the peak of construction period, approximately 100 crewmembers will be working on the Proposed Projects throughout the area. A total of approximately 58,000 temporary housing units are located in the County, of which the average occupancy rate is 63.3 percent. Thus, adequate temporary housing is available for crew members, and while the area's population may increase during the construction phase, the Proposed Projects will not cause a permanent increase in population. In addition, the Proposed Projects include no new extensions of service to new communities, either inside or outside of the CNF, and will not induce population growth.

Construction of the Proposed Projects will occur entirely within existing ROWs in the combined area of the Proposed Projects. Residents dwelling in houses within the ROWs will be temporarily relocated during construction activities that occur within close proximity to their dwellings, to the extent practicable, to ensure their safety during pole construction and stringing of the 69 kV power lines over these houses, as is consistent with current SDG&E customer contact and construction notification procedures. The number of residents within the ROWs requiring temporary relocation during construction activities is approximately 0.6 percent of all houses within 500 feet of the Proposed Projects.

Public Services

Information regarding local public services was primarily gathered from an Internet search of local planning agencies and service providers, as well as research visits to the combined area of the Proposed Projects and spatial analysis of GIS data obtained from the SanGIS website. Specifically, information regarding fire and emergency services was obtained from the San Diego Local Agency Formation Commission (San Diego LAFCO) and individual websites

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for local emergency services agencies and fire departments. Information regarding local area schools was obtained from local school district websites and the California Department of Education website. Information regarding local police services was obtained from the San Diego County Sheriff's Department and the U.S. Customs and Border Protection (CBP) websites.

Components of the Proposed Projects will be constructed primarily in remote areas within existing ROWs. No expansion of these existing 69 kV power lines will be added to the existing system as part of the Proposed Projects. As a result, the Proposed Projects will not result in the need for additional government or public services, such as schools or parks, because they will not induce population growth. Further, construction activities will not require the temporary or permanent closure of any existing public service facilities that could otherwise reduce service ratios or response times.

Utilities and Service Systems

Information regarding utilities and service systems was obtained from local government websites and through personal communication with public service providers, including the Ramona Municipal Water District, and various utility providers in the central San Diego County area. The San Diego County General Plan and General Plan Update Environmental Impact Report were reviewed for information pertaining to utility service areas, providers, and levels of service.

Water use during construction will be minimal and limited to approximately one 4,000-gallon water truck at each location for dust control and fire suppression activities. Water will be obtained from a local district of the San Diego County Water Authority (SDCWA) according to construction activity location and need. Based on recent water availability information from local public utility districts, water requirements during construction will not exceed the available supply in the area. Water used during construction activities will be distributed over the combined area of the Proposed Projects and will infiltrate the ground. Portable restrooms will be used and maintained during construction and removed after completion of the Proposed Projects. Wastewater from the portable restrooms will be disposed of at a wastewater treatment facility that currently has capacity. No impact to local sewer systems will result from the Proposed Projects, and no new water or wastewater treatment facilities will be required. No new point sources of water pollution will result from construction, and no wastewater treatment requirements established by the Regional Water Quality Control Board (RWQCB) will be exceeded. The Proposed Projects will also comply with construction-related best management practices as required by the RWQCB and currently implemented by SDG&E for all construction activities.

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Only transportation-related storm water drainage facilities along I-8 and various County roads are present within the combined area of the Proposed Projects. Further, construction of the Proposed Projects will not occur within these areas. Sufficient sources of potable water are available for SDG&E to conduct standard dust control and fire suppression activities. During the approximately four-year construction period, approximately one 4,000-gallon water truck will be available for dust control and fire suppression at each location while construction activities are occurring. Water will be obtained from a local district of the SDCWA according to construction location and need. Based on recent water availability from local public utility districts, water requirements during construction will not exceed the available supply in the area.

The Proposed Projects will not significantly affect landfill capacity because they will generate a limited amount of construction waste, which will be recycled to the maximum extent possible. Removed wood poles and conductors will be relocated to SDG&E's Mountain Empire Center of Operations yard and sorted for recycling or disposal. Construction and demolition materials not disposed of directly at a landfill will be processed at one of two processing facilities—Sanco Resource Recovery or San Marcos Construction Demolition and Inert Materials Processing—which have adequate capacity to accommodate the daily waste needs of the Proposed Projects. Any additional waste materials will be disposed of at the Ramona Landfill, Sycamore Landfill, Otay Landfill, or the Borrego Landfill. The remaining capacity at these landfills is approximately 65 million cubic tons, providing landfill capacity for the region until approximately 2071. Poles that are treated will be disposed of at a Clean Harbors Landfill, which is the nearest hazardous materials disposal facility and has the capacity to accommodate the Proposed Projects.

While there may be limited-duration telecommunication or cable television outages to some customers during construction activities, notice of a planned outage will be provided according to existing SDG&E procedures prior to its occurrence. Though some outages may be unavoidable, they will be short term, and will likely occur only during the stringing of new conductors or during the migration of the existing telecommunication and cable lines to the replacement SDG&E poles.

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Air Quality

Question #1

Please provide an air quality environmental and regulatory setting, including but not limited to:

- a. A description of the physical environment in the vicinity of the project (e.g., topography, climate, attainment status with respect to the California and National Ambient Air Quality Standards, existing ambient air quality in the project area)
- b. A list of air quality regulations applicable to the proposed project including San Diego Air Pollution Control District rules and regulations (e.g., Rule 55—Fugitive Dust Control)
- c. A description of greenhouse gases, the greenhouse effect, and potential impacts of climate change, and a description of applicable regulatory measures at the federal, state, and local level to reduce greenhouse gas (GHG) emissions.

SDG&E Response:

- a. A description of the environmental setting for Air Quality is included as CNF Existing Conditions as part of SDG&E's response to General Comments Question #3 in the location provided in Attachment A: Electronic File Directory.
- b. A description of the regulatory setting for Air Quality is included as CNF Existing Conditions as part of SDG&E's response to General Comments Question #3 in the location provided in Attachment A: Electronic File Directory.
- c. The following subsections provide a description of GHGs, the greenhouse effect, potential impacts of climate change, and the regulatory setting of the Proposed Projects regarding GHG emissions.

Greenhouse Gas Background

Many chemical compounds found in the earth's atmosphere act as GHGs. These gases allow sunlight to enter the atmosphere freely but absorb heat radiated from the surface of the earth and trap the heat in the atmosphere. Many gases exhibit these "greenhouse" properties. Some of them occur in nature—such as water vapor, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O)—and some are man-made, such as gases used for aerosols. Over time, the amount of energy sent from the sun to the earth's surface should be about the same as the amount of energy radiated back into space, keeping the temperature of the earth's surface roughly constant. The generally accepted scientific understanding is that human-caused increases in GHGs have and will continue to contribute to global warming; however,

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the scientific community is still in disagreement over the rate or magnitude of this warming. Potential effects of global warming include an increase of the earth's average temperatures and the changing of weather patterns over time. Effects on rainfall and temperature have the potential to affect energy supply and demand, water availability, agricultural production, population migration, and the economy.

Regulatory Setting

Over the past decade, the issue of climate change has developed into a critical issue for consideration in land use planning. The public and political will to address this issue has resulted in recent legislation in California designed to curb emissions and mandate limits and reductions on GHG emissions. The California Climate Action Team's Report to the Governor, published in April 2006, identifies initial strategies that the state should pursue for managing GHG emissions.

There are currently no regulations that define GHG emission thresholds that would apply to the Proposed Projects. In addition, there is currently no established standard for evaluating GHG emissions from mobile sources such as those that will compose the entirety of GHG emissions for the Proposed Projects. Diesel-powered construction equipment planned for use during construction of the Proposed Projects is typically not reported unless associated with a facility, and there are no reporting facilities included in any of the Proposed Projects.

California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32)

In response to Executive Order S-3-05 (June 2005), which declared California's particular vulnerability to climate change, the California Global Warming Solutions Act of 2006 AB 32, was signed into effect on September 27, 2006. In enacting the bill, the California Legislature found that:

"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."

This law requires the California Air Resources Board (CARB) to adopt a statewide GHG emissions limit equivalent to the levels in 1990 to be achieved by 2020. The following six compounds have been defined as GHGs under AB 32: CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (SF₆). To achieve this reduction goal, the CARB is

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required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The CARB established the statewide emissions limit for 2020 at its meeting on December 6, 2007. At the same time, the CARB also adopted regulations that require mandatory GHG emissions reporting.

The CPUC and California Energy Commission (CEC) concluded a lengthy proceeding in October 2008 to provide electricity and natural gas-specific recommendations to the CARB for inclusion in its scoping plan and AB 32 regulations and programs. The CARB adopted a comprehensive scoping plan in December 2008 that outlined programs designed to achieve the 2020 GHG reduction goal of 174 million metric tons of CO₂ equivalent (MMTCO₂E) emissions through regulations, market mechanisms, and other actions. For the electricity sector, the scoping plan adopted the fundamental recommendations of the CPUC for both investor-owned and publicly owned utilities to continue and increase the implementation of programs designed to reduce emissions and increase the use of electricity supplies obtained from renewable generation sources to 33 percent by 2020. The scoping plan also identified the CARB's plan to establish a cap and trade system to ensure an overall reduction of emissions from electric generation and other sources. As stated in the Final Recommendations:

“The electricity and natural gas sectors will play a critical role in achieving this ambitious goal. Indeed, [C]ARB’s Climate Change Draft Scoping Plan envisions that the electricity sector will contribute at least 40 percent of the total statewide GHG reductions, even though the sector currently creates just 25 percent of California’s GHG emissions. This is before considering the additional emissions reductions that are projected to result from a GHG emissions allowance cap and trade system, if such a system is adopted and implemented. The electricity sector is expected to reduce its emissions further due to its participation in such a market-based system.”

The CPUC/CEC Joint Recommendation Decision, adopted on October 16, 2008, details the planned GHG reductions. This document makes three important points. First, GHG emissions from the electricity sector have been essentially flat since 1990. Second, the “reference case” modeled by the CPUC’s consultants (the current 20 percent Renewable Portfolio Standard [RPS]¹ and existing energy efficiency programs) would result in continued compliance with the electricity sector’s 1990 proportional share of GHG emissions by 2020, despite population growth. Third, the “accelerated policy case” (33 percent RPS plus greater energy efficiency as proposed by the CPUC, CEC, and CARB) would produce approximately 30 MMTCO₂E of annual reductions or approximately 27 percent below 1990 levels. This is without considering additional reductions expected from the cap and trade

¹ The requirement imposed on utilities to derive a specified percentage of their power from renewable sources is known as an RPS.

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program that the CARB has adopted and implemented, with the first compliance period beginning in 2013.

Throughout 2009, CARB staff drafted rules to implement the AB 32 Scoping Plan and held public workshops on each measure, including market mechanisms. The CARB has identified “Discrete Early Actions” that would be implemented to reduce GHG emissions from the years 2007 to 2012. On January 29, 2009, the CARB also announced its regulatory schedule to adopt 74 separate regulations and other measures and the 33 percent RPS recommended in the Final Recommendations and in the CARB Scoping Plan. The early action measures identified within the Scoping Plan took effect on January 1, 2010, and the CARB continued to adopt GHG emissions regulations throughout 2011 and 2012. On January 1, 2012, GHG rules and market mechanisms adopted by the CARB became legally enforceable.

Greenhouse Gas Emissions Inventory

CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆ are all GHGs that contribute to global climate change. Emissions of CO₂ occur largely from combustion of fossil fuels. The major categories of fossil fuel combustion sources can be broken into the following five sectors: residential, commercial, industrial, transportation, and electricity generation. GHG emissions—such as CH₄ and N₂O, which occur in smaller quantities—are also tracked by state inventories. The Proposed Projects do not include any materials or equipment that contain SF₆.

California is responsible for approximately 500 MMTCO₂E, or more than one percent of the 49,000 MMTCO₂E emitted globally. Electricity generation within California is responsible for about 55 MMTCO₂E (depending on yearly variations) or 11 percent of the total statewide CO₂ emissions and about one percent of statewide CH₄ emissions.

The Climate Registry (Registry)—formerly the California Climate Action Registry (CCAR)—offers protocols to facilitate the preparation of inventories of GHG emissions. The Registry is a non-profit public corporation that records GHG emissions inventories that California entities voluntarily report. SDG&E has been a Registry/CCAR member since 2003 and has provided voluntary reports of “entity-wide” GHG emissions since 2004.

Greenhouse Gas Significance Thresholds, CEQA Guidelines

The Office of Planning and Research (OPR) is the statewide, comprehensive planning agency that is responsible for making policy recommendations and coordinating land use planning efforts. The OPR also coordinates the state-level review of environmental documents pursuant to the CEQA. The OPR drafted amendments to the CEQA Guidelines discussing analysis of GHG emissions. The California Natural Resources Agency adopted

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the amendments, which became effective in 2010. The amendments include Code of Regulations, Title 14, Section 15064.4, which states that the “lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.”

The lead agency has discretion to use either a quantitative or a qualitative approach to analyzing GHG emissions. The lead agency should consider factors such as whether the project increases or reduces GHG emissions compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies; and the project’s compliance with regulations or requirements adopted to implement a statewide, regional, or local plan for reducing or mitigating GHG emissions.

On October 24, 2008, the CARB released its interim CEQA significance thresholds for GHG emissions, stating that a zero threshold is not required. The guidance divides projects analyzed under CEQA into two categories—industrial and residential/commercial—and provides significance criteria for each. The Proposed Projects qualify as industrial projects and, as a result, would each be considered less than significant if the following two conditions are met:

- The project meets minimum performance standards or includes equivalent mitigation measures for the following:
 - Construction – Meets an interim CARB performance standard for construction-related emissions
 - Transportation – Meets an interim CARB performance standard for transportation-related emissions
- The project with mitigation would emit no more than approximately 7,000 MMTCO₂E per year from operation of non-transportation-related GHG sources. These sources include:
 - Combustion-related components/equipment
 - Process losses
 - Purchased electricity

South Coast Air Quality Management District Greenhouse Gas Emissions Threshold

The South Coast Air Quality Management District (SCAQMD) has issued a proposed approach to evaluate GHG emissions and suggested significance thresholds until a state-wide approach and thresholds are adopted. The SCAQMD proposal calls for a tiered approach to the evaluation of emissions, with one of the significance thresholds being that GHG

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emissions from industrial projects total less than 10,000 metric tons of CO₂ equivalent (MTCO₂E) per year. Construction emissions are evaluated by amortizing them over 30 years and adding them to the operational emissions. The SCAQMD is the closest local air district to the Proposed Projects that has prepared such a threshold.

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Question #2

Please provide the supporting construction emission calculations of the proposed action, connected actions, and similar actions. If the emissions by calendar year are not clearly

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available from the supporting calculation, please provide tables showing the annual and maximum daily emissions by calendar year.

SDG&E Response:

Annual and maximum daily emissions calculations, by calendar year, as well as all supporting construction emissions calculations for the Proposed Action, Connected Actions, and Similar Actions have been provided in Table 1: Criteria Air Pollutant Exceedances During Construction – Proposed Action (Revised Table 17 from the Preliminary POD), Table 2: Criteria Air Pollutant Exceedances During Construction – Connected Actions (Revised Table 18 from the Preliminary POD), Table 3: Criteria Air Pollutant Exceedances During Construction – Similar Actions (Revised Table 19 from the Preliminary POD), and Table 4: Annual GHG Emissions.

Question #3

The discussion of General Conformity on page 69 contains some errors:

- a. The San Diego Air Basin is not designated as nonattainment or maintenance with respect to the National Ambient Air Quality Standard for PM₁₀. Therefore, General Conformity does not apply to the proposed U.S. Forest Service action, contrary to the statement in the POD. Furthermore, the U.S. Environmental Protection Agency (EPA) has adopted de minimis thresholds for all criteria air pollutants, contrary to statements in the POD. The discussions in paragraph 2, page 68, and paragraph 3, page 69, should be revised accordingly.
- b. The non-desert (western and central) portion of the San Diego Air Basin, in which the project is located, is designated as a maintenance area with respect to the National Ambient Air Quality Standard for carbon monoxide. Please add carbon monoxide to the discussion of General Conformity (paragraph 3, page 69). The de minimis threshold for carbon monoxide is 100 tons per year.

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Table 1: Criteria Air Pollutant Exceedances During Construction – Proposed Action (Revised Table 17 from the Preliminary POD)

Pollutant	Threshold (pounds per day)	Maximum (pounds per day)	Approximate Number of Weeks Exceeded
Volatile Organic Compounds (VOCs)	75	136.56	19
Nitrous Oxides (NO _x)	250	1,082.4	55
Carbon Monoxide (CO)	550	571.08	1
Sulfur Dioxide (SO ₂)	250	1.52	0
Particulate Matter (PM) Less Than 10 Microns in Diameter (PM ₁₀)	100	71.18	0
PM Less Than 2.5 Microns in Diameter (PM _{2.5})	55	63.18	2

Table 2: Criteria Air Pollutant Exceedances During Construction – Connected Actions (Revised Table 18 from the Preliminary POD)

Pollutant	Threshold (pounds per day)	Maximum (pounds per day)	Approximate Number of Weeks Exceeded
VOCs	75	136.56	32
NO _x	250	1,082.4	90
CO	550	571.08	1
SO ₂	250	1.52	0
PM ₁₀	100	71.18	0
PM _{2.5}	55	63.18	4

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Table 3: Criteria Air Pollutant Exceedances During Construction – Similar Actions (Revised Table 19 from the Preliminary POD)

Pollutant	Threshold (pounds per day)	Maximum (pounds per day)	Approximate Number of Weeks Exceeded
VOCs	75	136.56	14
NO _x	250	1,082.4	40
CO	550	571.08	<1
SO ₂	250	1.52	0
PM ₁₀	100	71.18	0
PM _{2.5}	55	63.18	2

Table 4: Annual GHG Emissions

Pollutant	Annual Emissions (metric tons per year)					Total
	2013	2014	2015	2016	2017	
Unmitigated CO ₂ Equivalent (CO ₂ E)	4,924.46	9,017.90	8,116.24	4,603.81	1,321.54	27,983.95
Reduction from APM- AIR-01	492.45	901.79	811.62	460.38	132.15	2,798.40
Mitigated CO ₂ E	4,432.01	8,116.11	7,304.62	4,143.43	1,189.39	25,185.56

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SDG&E Response:

a. Paragraph 2, page 68, of the Preliminary POD should be revised as follows:

In federal nonattainment areas, the federal General Conformity rule (42 U.S. Code Section 7606(c), Code of Federal Regulations, Title 40, Section 51, Subpart W) would provide additional significance criteria. In the County, there are no applicable General Conformity thresholds for pollutants other than ozone precursors, such as volatile organic compounds (VOCs), and PM₁₀ because these areas attain the federal ambient air quality standards for all other pollutants. The General Conformity applicability *de minimis* threshold for ~~volatile organic compounds (VOCs)~~ in the Proposed Action area is 100 tons per year; ~~no threshold exists for PM₁₀~~. The General Conformity applicability *de minimis* threshold for carbon monoxide (CO), 100 tons per year, is also taken into consideration as the area is designated as a maintenance area.

b. Paragraph 3, page 69, of the Preliminary POD should be revised as follows:

Based on the currently anticipated schedule and construction equipment required for the Proposed Action, the Proposed Action would emit a maximum of approximately 4.2 tons per year of VOCs, well below the General Conformity applicability *de minimis* threshold for VOCs. In addition, the Proposed Action would emit a maximum of approximately 17.5 tons per year of CO, which also falls below the General Conformity applicability *de minimis* threshold for CO. The Proposed Action's largest emission would be of nitrogen oxides (NO_x); the maximum annual emission of this pollutant would be approximately 33.0 tons per year, also well below the federal threshold of 100 tons per year that would be applied were San Diego County a nonattainment area for this pollutant. ~~As stated previously, there are no General Conformity thresholds for CO, PM_{2.5}, and PM₁₀.~~

Question #4

For the purpose of full disclosure, it would be preferable to report the emissions of all criteria air pollutants in Table 17 on page 70 (Proposed Action), rather than only those that exceed the significance thresholds.

SDG&E Response:

Table 1: Criteria Air Pollutant Exceedances During Construction – Proposed Action (Revised Table 17 from the Preliminary POD), provided previously in response to Air Quality Question #2, should be revised as indicated to include the anticipated maximum daily emissions for all criteria air pollutants.

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Question #5

Please show the maximum daily emission values for all criteria air pollutants in Tables 18 on page 72 (Connected Actions) and 19 on page 73 (Similar Actions), rather than only the significance thresholds and the number of days of exceedance as shown in the tables.

SDG&E Response:

Table 2: Criteria Air Pollutant Exceedances During Construction – Connected Actions (Revised Table 18 from the Preliminary POD) and Table 3: Criteria Air Pollutant Exceedances During Construction – Similar Actions (Revised Table 19 from the Preliminary POD) should be revised to indicate the maximum daily emissions for all criteria air pollutants. In addition, the tables in the Preliminary POD incorrectly reported the number of days that each threshold may be exceeded. The header row in the tables provided previously in response to Air Quality Question #2 has been updated to reflect the number of weeks that each threshold may be exceeded.

Question #6

Please provide a table showing the cumulative daily emissions due to overlapping construction activities for the proposed action, connected actions, and similar actions. The emissions of the collective project should also be compared to the significance thresholds, and not just each separate action or project.

SDG&E Response:

At the time of construction schedule development, a distinction was not made among construction activities regarding the applicable regulatory jurisdiction. As stated in the Preliminary POD, construction activities are anticipated to occur over an approximately four-year time frame as regulatory approval and external conditions—such as planned outages and local weather conditions—are taken into consideration. As a result, construction activities pertaining to the Proposed Action, Connected Actions, and Similar Actions cannot be accurately separated from one another for the purposes of construction scheduling. In order to evaluate a potential worst-case scenario, SDG&E summed all daily emissions rates for the Proposed Action, Connected Actions, and Similar Actions to identify the cumulative daily emissions rates for all activities. These cumulative daily emissions rates are the same as the maximum daily emissions rates indicated in Table 1: Criteria Air Pollutant Exceedances During Construction – Proposed Action (Revised Table 17 from the Preliminary POD), Table 2: Criteria Air Pollutant Exceedances During Construction – Connected Actions (Revised Table 18 from the Preliminary POD), and Table 3: Criteria Air Pollutant Exceedances During Construction – Similar Actions (Revised Table 19 from the Preliminary POD), which have been provided in response to Air Quality Questions #4 and #5. The column “Approximate Number of Weeks

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Exceeded” in these revised tables compares the cumulative/maximum daily emissions rates to the significance thresholds and provides the approximate number of weeks where each threshold may be exceeded due to construction activities.

Question #7

Please provide the following:

- Quantify GHG emissions from a business-as-usual snapshot. That is, what the GHG emissions will be from the proposed action, connected actions, and similar actions if no mitigations are used.
- Quantify GHG emission reductions from every Applicant Proposed Measure (APM) that is implemented. The quantifications will be itemized and placed in a table format.
- Identify the net emissions of a project after mitigations have been applied.
- Calculate and quantify GHG emissions (CO₂ equivalent) for the project including construction.
- Calculate and quantify the GHG reduction based on reduction measures proposed for the project.

It is recognized that typical mitigation measures or APMs to reduce criteria air pollutant emissions (e.g., carpooling for workers, minimized idling of construction equipment and trucks) are not generally quantifiable and would not substantially reduce GHG emissions. Therefore, the Applicant should quantify the GHG emissions associated with construction of the proposed action, connected actions, similar actions, and the cumulative emissions over the entire construction per period by calendar year.

- Propose Applicant Proposed Measures (APM) to implement and follow to maximize GHG reductions.
- Discuss programs already in place to reduce GHG emissions on a systemwide level. These programs may include the applicant’s voluntary compliance with the U.S. EPA SF₆ reduction program, reductions from energy efficiency, demand response, Long-Term Procurement Plan, and renewable energy.

SDG&E Response:

Bullet #1: Business-As-Usual Snapshot

Maximum daily emissions from the Proposed Action, Connected Actions, and Similar Actions are assumed to be identical as all actions will utilize similar construction scenarios.

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Further, construction activities of the Proposed Action, Connected Actions, and Similar Actions may overlap periodically depending on the final construction schedule. Table 4: Annual GHG Emissions, provided in response to Air Quality Question #2, represents the maximum annual GHG emissions, by year, from construction.

All 69 kV power lines and 12 kV distribution lines included in the Proposed Action, Connected Actions, and Similar Actions are existing lines operated and maintained according to established SDG&E procedures. Due to the typically reduced maintenance requirements of steel poles when compared to wood poles, these existing activities will not change, or may decrease slightly following construction of the Proposed Action, Connected Actions, and Similar Actions. As a result, the GHG emissions associated with this work were not calculated and were assumed to be unchanged. The emissions above represent a business-as-usual profile for construction of the combined Proposed Action, Connected Actions, and Similar Actions. As described in response to Question #1, the SCAQMD has issued a proposed approach to evaluation of GHG emissions and suggested significance thresholds until a state-wide approach and thresholds are adopted; the SCAQMD is the closest local air district to the Proposed Projects that has prepared such a threshold. The SCAQMD proposed approach includes a threshold of significance for industrial projects of less than 10,000 MTCO₂E per year. Construction emissions are evaluated by amortizing them over 30 years and adding them to the operational emissions. As shown in Table 4: Annual GHG Emissions, provided in response to Air Quality Question #2, the unmitigated CO₂E emissions calculated for the construction phases of the Proposed Action, Connected Actions, and Similar Actions are less than the 10,000 MTCO₂E threshold.

Bullet #2: GHG Emissions Reductions from APMs

As described in the Preliminary POD, SDG&E incorporated a number of APMs recommended by the CPUC in Section 6.4 Suggested Applicant Proposed Measures to address GHG Emissions of *Attachment 1: Addition of GHG Guidance in the Working Draft of the PEA Checklist*. As stated in the Preliminary POD, APM-AIR-01 requires that unnecessary construction vehicle and idling time be minimized. It also requires that a “common sense” approach to vehicle use be applied during construction. This APM is expected to reduce overall vehicle emissions by up to 10 percent. The table provided in response to Bullet #1 shows an estimated reduction in annual GHG emissions from the implementation of APM-AIR-01.

Bullet #3: Net Emissions Following Mitigation

The table provided in response to Bullet #1 indicates the reduced annual GHG emissions associated the implementation of APM-AIR-01. Although the unmitigated CO₂E emissions are already under the SCAQMD’s proposed threshold of 10,000 MTCO₂E per year,

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SDG&E's incorporation of APM-AIR-01 is anticipated to reduce total GHG emissions by approximately 2,800 MTCO₂E over the approximately four-year construction schedule.

Bullet #4: Calculate GHG Emissions (CO₂ Equivalent) Including Construction

The table provided in response to Bullet #1 contains the GHG emissions, by year, and total GHG emissions related to the construction of the Proposed Projects. Because operation and maintenance activities for the Proposed Projects will not differ from the activities currently undertaken for the existing 69 kV power lines, and because these activities are considered as part of the baseline conditions for the Proposed Projects, the calculated GHG emissions provided in this response result only from construction activities.

Bullet #5: Calculate GHG Emissions Reductions

As described previously, APM-AIR-01 is anticipated to reduce GHG emissions by up to 10 percent. The table provided in response to Bullet #1 above contains the reductions associated with APM-AIR-01 and the resulting GHG emissions from construction of the Proposed Projects. SDG&E's incorporation of APM-AIR-01 is anticipated to reduce total GHG emissions by approximately 2,800 MTCO₂E over the approximately four-year construction schedule.

Bullet #6: APMs to Maximize GHG Emissions Reductions

The Preliminary POD includes two APMs, APM-AIR-01 and APM-AIR-04, to reduce potential GHG emissions. These APMs are measures suggested by the CPUC in Section 6.4 Suggested Applicant Proposed Measures to address GHG Emissions of *Attachment 1: Addition of GHG Guidance in the Working Draft of the PEA Checklist*. As discussed in the responses to Bullets #1, 3, and 5, any GHG emissions associated with the Proposed Projects will be well under the significance threshold used by the SCAQMD; therefore, no additional APMs have been proposed.

Bullet #7: System-wide Programs to Reduce GHG Emissions

SDG&E participates in and has implemented a number of system-wide programs and practices to reduce GHG emissions, but none of these activities are applicable to the Proposed Projects. Additional information regarding SDG&E's corporate practices can be found on the company's website, including the following page: <http://www.sdge.com/clean-energy/environmental-compliance/greenhouse-gas-emissions-reporting>.

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Biological Resources

Question #1

General overall comments for Section 10.1:

- a. There is no discrete Methods section provided in Section 10.1. Please provide thorough descriptions of the methods used to conduct vegetation mapping, focused surveys, and analysis for the variety of listed and special-status botanical and wildlife species that might have potential to occur within the project area. A listing of these species is included in Tables 20 and 21.
- b. Please include a table of survey conditions (e.g., date, temperature, wind speed, cloud cover, times, moon phase and water temperature as appropriate, soil temperature as appropriate, etc.) and personnel used to conduct the surveys/analysis/assessments.
- c. Please include a section on the literature used to evaluate the project.
- d. Please provide a description of the methods used to evaluate wetlands and other jurisdictional areas. Please discuss the survey limitations.
- e. Please provide shapefiles for all biological resources, including but not limited to focal species survey results, wetland delineation results, vegetation mapping results, California Natural Diversity Database/U.S. Fish and Wildlife Service/U.S. Forest Service (CNDDDB/USFWS/USFS) data used in the analysis. It is anticipated that these data sets will include appropriate buffers to the actual proposed action, connected actions, and similar actions alignments.
- f. Please provide copies of the focused survey reports.
- g. Please discuss the environmental setting as it applies to biological resources (e.g., soils, water resources, slopes) and the regional context (e.g., draft East County Multiple Species Conservation Plan, Forest Management Plan):

SDG&E Response:

Relevant methodologies for the general biological resource surveys and focused surveys are included in the biological resource technical reports, which have been provided as part of SDG&E's response to General Comments Question #2 in the locations provided in Attachment A: Electronic File Directory.

Survey conditions and information regarding personnel who conducted the general biological resource surveys and focused surveys are included in the biological resource technical

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reports, which have been provided as part of SDG&E's response to General Comments Question #2 in the locations provided in Attachment A: Electronic File Directory.

A description of the literature and other information used to evaluate the Proposed Projects is included in Section 3.1 Literature and Database Review of the BTR, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory.

- a. The methodology used to conduct general hydrological resource surveys for the Proposed Projects was provided in the Section 10.4 Hydrology of the Preliminary POD.
- b. GIS shapefiles not previously provided with the Preliminary POD for biological resources are included in the GIS data provided as part of SDG&E's response to General Comments Question #2 in the locations provided in Attachment B: GIS Data File Directory. Wetland delineations have not been conducted for the Proposed Projects, so GIS shapefiles for this information has not been included.

All focused survey reports are included in the technical reports provided as part of SDG&E's response to General Comments Question #2 in the locations provided in Attachment A: Electronic File Directory.

The environmental setting for biological resources in the combined area of the Proposed Projects is described in the Preliminary POD and the BTR, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory. Supplemental information has also been included in CNF Existing Conditions, which has been provided as part of SDG&E's response to General Comments Question #3 in the location provided in Attachment A: Electronic File Directory.

Question #2

Section 10.1, Introduction (page 73): Please provide additional background information and sources with regard to 2009 and 2012 USFS consultation regarding potential sensitive biological resources.

SDG&E Response:

SDG&E prepared the 2010 focused surveys in consultation with the CNF biologist, Kirsten Winter, and USFWS biologist, Kathleen Pollett. There was also some preliminary coordination with the California Department of Fish and Game (CDFG) Natural Community Conservation Plan (NCCP) Coordinator (Julia Dyer), but because these surveys were being performed in support of the federal MSUP action, the CDFG's involvement was limited.

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There was no additional consultation with the CNF or USFWS on the 2012 BTR as it summarizes the results of the 2010 survey.

Kirsten Winter provided direction that CNF-identified occupied habitat should be assumed to be occupied and did not require confirmation. Kathleen Pollett concurred with this direction. Habitat assessments and focused surveys were limited to modeled potentially suitable habitat.

Question #3

Section 10.1, Introduction (page 74): Please enumerate the ways in which SDG&E's Natural Community Conservation Plan (NCCP) fully addresses all of the potential construction and operations and maintenance (O&M) activities associated with the project.

SDG&E Response:

SDG&E's NCCP was developed in coordination with the USFWS and the CDFG to protect and preserve certain biological resources and associated habitats as if they were listed under the federal Endangered Species Act (ESA) or California ESA (CESA), while at the same time allowing SDG&E to construct, operate, and maintain gas and electric transmission and distribution facilities throughout its service territory. To this end, the NCCP facilitates construction, operation, and maintenance activities by enabling these activities to be conducted without having to undergo the typical ESA and CESA permitting processes on a project- or species-specific basis. Protection of the 111 species covered under the NCCP includes the avoidance of impacts, where possible, and includes 61 protective and conservation measures, or operational protocols, to avoid, minimize, or mitigate any potential impacts to covered species during SDG&E's activities.

As part of SDG&E's NCCP process, surveys are conducted prior to construction to identify the location of and assess potential impacts to listed species, as well as species on the USFS Regional Forester's sensitive species list. Project-specific avoidance and minimization measures to be implemented alongside the NCCP's applicable operational protocols are identified during this process, and all relevant information collected is provided to the USFWS and the CDFG for review and comment in a pre-activity survey report (PSR). In addition, according to the NCCP, if a species is known or expected to occur in the project area, the PSR will provide a discussion as to whether the species was observed or would be expected at the specific project site based on habitat conditions. Where activities will occur within the CNF, this information is also provided to the USFS for review, comment, and approval.

The NCCP is an effective impact identification, avoidance, and minimization tool because:

- pre-construction surveys are conducted prior to any work being performed;

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- the operational protocols were created with the intent of covering all potential impacts from SDG&E's typical construction, operation, and maintenance activities, such as those included for the Proposed Projects;
- any specific measures that are needed to supplement the operational protocols for a Proposed Project will be clearly defined prior to construction; and
- the process has been successfully implemented on SDG&E's wood-to-steel conversion projects since its inception and has the approval of both the USFWS and CDFG.

SDG&E has identified a number of operational protocols which, at a minimum, will be included to protect biological resources during construction. These operational protocols are provided in Table 5: SDG&E NCCP Operational Protocol List. Because SDG&E's operation and maintenance activities for the Proposed Projects will be the same as those currently in place for the existing 69 kV power lines and have previously been vetted by the USFWS and the CDFG, no additional avoidance and minimization measures for these activities will be required.

Question #4

Section 10.1, Introduction (page 74): Please provide more information regarding why focused surveys were not conducted within areas considered to be occupied habitat by USFS.

SDG&E Response:

As described in the response to Biological Resources Question #2, the USFS directed SDG&E to presume occupancy of those areas modeled by the USFS as occupied habitat. As a result, focused surveys were not conducted.

Question #5

Section 10.1.0, Proposed Action (page 74): Please provide more detailed descriptions of the 15 vegetation communities for the proposed action, connected actions, and similar actions. It is anticipated that these communities were further delineated to their subcommunities, alliances, or associations. Please also include an acreage table for each community by circuit. Please discuss their conservation status.

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Table 5: SDG&E NCCP Operational Protocol List

NCCP Operational Protocol	Species
<i>7.1.1 General Behavior for All Field Personnel</i>	
1. Vehicles must be kept on access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads to allow reptile species to disperse. Vehicles must be turned around in established or designated areas only.	Special-status plant and wildlife species
2. No wildlife, including rattlesnakes, may be harmed, except to protect life and limb.	Special-status wildlife species
3. Firearms shall be prohibited on the rights-of-way except for those used by security personnel.	Special-status wildlife species
4. Feeding of wildlife is not allowed.	Special-status wildlife species
5. SDG&E personnel are not allowed to bring pets on the rights-of-way in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations.	Special-status wildlife species
7. Plant or wildlife species may not be collected for pets or any other reason.	Special-status plant and wildlife species
<i>7.1.2 Training</i>	
11. All SDG&E personnel working within the project area shall participate in an employee training program conducted by SDG&E, with annual updates. The program will consist of a brief discussion of endangered species biology and the legal protections afforded to Covered Species; a discussion of the biology of the Covered Species protected under this Subregional Plan; the habitat requirements of these Covered Species; their status under the Endangered Species Acts; measures being taken for the protection of Covered Species and their habitats under this Subregional Plan; and a review of the Operational Protocols. A fact sheet conveying this information will also be distributed to all employees working in the project area.	Special-status plant and wildlife species

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NCCP Operational Protocol	Species
7.1.3 Preactivity Studies	
<p>13. The Environmental Surveyor shall conduct preactivity studies for all activities occurring off of access roads in natural areas. The scope of these studies is included in Appendix A. The Environmental Surveyor will complete a preactivity study form contained in Appendix A, including recommendations for review by a biologist and construction monitoring as appropriate. Biologists should be called in when there is the potential for unavoidable impacts to Covered Species. The forms are for information only, and will not require CDFG or USFWS approval. These forms shall be faxed to CDFG and USFWS, along with phone notification, who will reply within 5 working days, indicating if they would like to review the project and/or suggest recommendations for post project monitoring. If a biologist is required, he/she will be contacted concurrent to notification to CDFG and USFWS. SDG&E's project may proceed during this time if necessary, in compliance with the recommendations of the biologist (For narrow endemic species see mitigation IV following Table 3.1). USFWS survey protocols performed by qualified biologists will be required for new projects which are defined as projects requiring CEQA review. In those situations where the Environmental Surveyor cannot make a definitive species identification, an on-call biologist will be brought in. When the biologist is called he or she will be contacted concurrently with CDFG and USFWS. The biologist will make the determination of the species in question and recommend avoidance or mitigation approaches to the Environmental Surveyor and a decision will be made. In those situations where more than one visit may be necessary to identify a given species, such as certain birds, no more than three site visits shall be required. It is expected that the typical USFWS search protocols will not be utilized in most situations due to the Plan's avoidance priority. Background information necessary to complete the annual report shall be collected on the preactivity study form and used by SDG&E to prepare the annual report.</p>	Special-status plant and wildlife species
<p>14. In order to ensure that habitats are not inadvertently impacted, the Environmental Surveyor shall determine the extent of habitat and flag boundaries of habitats which must be avoided. When necessary, the Environmental Surveyor should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the Environmental Surveyor shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project specific basis.</p>	Special-status plant and wildlife species

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NCCP Operational Protocol	Species
15. SDG&E will maintain a library of rare plant locations known to SDG&E occurring within easements and fee owned properties. "Known" means a verified population, either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency Habitat Conservation Plans, pre-activity surveys, or biological surveys conducted for environmental compliance on a project site (e.g. initial study), but there is no requirement for development of original biological data. Plant inventories shall be consulted as part of pre-activity survey procedures.	Special-status plant species
<i>7.1.4 Maintenance, Repair and Construction of Facilities</i>	
16. Maintenance, repair and construction Activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.	Special-status plant species
17. Routine maintenance of all Facilities includes visual inspections on a regular basis, conducted from vehicles driven on the access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot, or from the air.	Special-status plant and wildlife species
20. Hydrologic impacts will be minimized through the use of state-of-the-art technical design and construction techniques to minimize pending, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices.	Special-status plant and wildlife species
24. During work on facilities, all trucks, tools, and equipment should be kept on existing access roads or cleared areas, to the extent possible.	Special-status plant and wildlife species
25. Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable.	Special-status plant and wildlife species
27. Brush clearing around facilities for fire protection shall not be conducted from March through August without prior approval by the Environmental Surveyor. The Environmental Surveyor will make sure that the habitat contains no active nests, burrows, or dens prior to clearing.	Special-status wildlife species

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NCCP Operational Protocol	Species
<p>28. In the event SDG&E identifies a covered species of plant within a 10' radius around power poles, which is the area required to be cleared for fire protection purposes, SDG&E shall notify USFWS (for ESA listed plants), and CDFG (for CESA listed plants), in writing, of the plant's identity and location and of the proposed Activity, which will result in a Take of such plant. Notification will occur ten (10) working days prior to such Activity, during which time USFWS or CDFG may remove such plant(s). If neither USFWS or CDFG have removed such plant(s) within the ten (10) working days following the notice, SDG&E may proceed to complete its fire clearing and cause a Take of such plant(s).</p> <p>When fire clearing is necessary in instances other than around power poles, and the potential for impacts to Covered Species exists, SDG&E will follow the preactivity study and notification procedures in Operational Protocol number 13.</p>	Special-status plant species
<p>29. Wire stringing is allowed year round in sensitive habitats if conductor is not allowed to drag on ground or in brush and vehicles remain on access roads.</p>	Special-status plant and wildlife species
<p>30. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes.</p>	Special-status plant and wildlife species
<p>34. If any previously unidentified dens, burrows, or plants are located on any project site after the preactivity survey, the Environmental Surveyor shall be contacted. Environmental Surveyor will determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc.</p>	Special-status plant and wildlife species
<p>35. The Environmental Surveyor shall conduct monitoring as recommended in the preactivity survey report. At completion of work, the Environmental Surveyor shall check to verify compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the Environmental Surveyor is responsible for removing all habitat flagging from the construction site.</p>	Special-status plant and wildlife species
<p>36. The Environmental Surveyor shall conduct checks on mowing procedures, to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than 4 inches.</p>	Special-status plant and wildlife species

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NCCP Operational Protocol	Species
37. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected or from which animals could not be removed shall be capped or otherwise covered at the end of each work day. Old piping or other supplies that have been left open, shall not be capped until inspected and any species found in it allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by CDFG.	Special-status wildlife species
38. All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife are located in the trench or excavation, the Environmental Surveyor shall be called immediately to remove them if they cannot escape unimpeded.	Special-status wildlife species
39. Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities will be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour.	Special-status plant species
<i>7.1.5 Maintenance of access roads shall consist of:</i>	
41. Repair of erosion by grading, addition of fill, and compacting. In each case of repair, the total area of disturbance shall be minimized by careful access and use of appropriately sized equipment. Repairs shall be done after preactivity surveys conducted by the Environmental Surveyor and in accordance with the recommendations regarding construction monitoring and relevant protocols. Consideration should be given to source of erosion problem, when source is within control of SDG&E.	Special-status plant and wildlife species
42. Vegetation control through grading should be used only where the vegetation obscures the inspection of facilities, access may be entirely lost, or the threat of Facility failure or fire hazard exists. The graded access road area should not exceed 12'-wide on straight portions (radius turns may be slightly wider) (See Figure 23).	Special-status plant species
43. Mowing habitat can be an effective method for protecting the vegetative understory while at the same time creating access to a work area. Mowing should be used when permanent access is not required since, with time, total revegetation is expected. If mowing is in response to a permanent access need, but the alternative of grading is undesirable because of downstream siltation potential, it should be recognized that periodic mowing will be necessary to maintain permanent access.	Special-status plant and wildlife species

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NCCP Operational Protocol	Species
44. Maintenance work on access roads should not expand the existing road bed (See Figure 23).	Special-status plant and wildlife species
<i>7.1.8 Survey Work</i>	
54. Brush clearing for foot paths or line-of-sight cutting is not allowed from March through August in sensitive habitats without prior approval from the Environmental Surveyor, who will ensure that activity does not adversely affect a sensitive species.	Special-status wildlife species
55. SDG&E survey personnel must keep vehicles on existing access roads. No clearing of brush for panel point placement is allowed from March through August without prior approval from the Environmental Surveyor.	Special-status wildlife species
<i>7.1.9 Emergency Repairs</i>	
57. During a system emergency, unnecessary carelessness which results in environmental damage is prohibited.	Special-status plant and wildlife species

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SDG&E Response:

Section 4.1 Ecosystems of the BTR provides detailed descriptions of the 15 vegetation communities. Table 4: Vegetation Acreages per Circuit and Tie-Line and Table 5: Vegetation Acreages for Survey Area in the BTR provide acreage tables for each vegetation community by power line and distribution circuit. Of the 15 vegetation communities present in the Proposed Projects area, three—freshwater seep, montane wet meadow, and southern riparian forest—have federal and/or state conservations status, which are shown in Table 6: Vegetation Community Conservation Status and discussed further as follows.

Freshwater seep and montane wet meadow have the potential to support the USACE, RWQCB, and CDFG-jurisdictional areas. Section 404 of the Clean Water Act (CWA) authorizes the USACE to regulate the discharge of dredged or fill material to waters of the U.S., including wetlands (U.S. Code, Title 33, Section 1344). A CWA Section 401 Water Quality Certification through the RWQCB is generally required to impact wetland features, including isolated wetland features. The CDFG may take jurisdiction over wetland features that are adjacent to another CDFG-jurisdictional feature, such as a drainage that exhibits bed and bank or a riparian area.

All riparian areas in the combined area of the Proposed Projects, including southern riparian forest, are potentially under the jurisdiction of the CDFG. Riparian areas have the potential to occur in most vegetation communities present along the alignment, in the vicinity of hydrologic features. The CDFG protects riparian areas due to their value to wildlife species.

The remaining 12 vegetation communities that will be impacted by the Proposed Projects do not have any state or federal conservations statuses associated with them being biological resources. The California Native Plant Society (CNPS), through the CNDDDB, provides Nature Conservancy Heritage Program Status Ranks for certain vegetation communities along the alignment. For example, chamise chaparral and non-native grassland are both listed as G4 S4; however, there is no conservation status associated with Nature Conservancy Heritage Program Status Ranks. The CNDDDB provides spatial data for sensitive vegetation communities, and none of the sensitive vegetation communities identified by the CNDDDB cross any portion of the Proposed Projects.

The NCCP does not provide conservation statuses for specific vegetation communities, but requires that protocols be implemented to protect vegetation communities. The protocols include limiting vehicle speeds to reduce fugitive dust, monitoring during vegetation removal, and minimizing vegetation removal to the greatest extent feasible.

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Table 6: Vegetation Community Conservation Status

Vegetation Community	Conservation Status
Chamise Chaparral	None
Diegan Coastal Sage Scrub	None
Disturbed (Ruderal/Barren)	None
Freshwater Seep/Open Water	State and/or Federally Protected
Mixed Oak Woodland	None
Native Grassland	None
Non-Native Grassland	None
Oak Savanna	None
Pastureland/Cultivated Agriculture	None
Semi-Desert Chaparral	None
Southern Mixed Chaparral	None
Southern Riparian Forest	State Protected
Urban and Developed/Ornamental Landscaping	None
Montane Forest	None
Montane Wet Meadow	State and/or Federally Protected

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References

CNPS. 1997. Sawyer, J. and Keeler-Wolf, T. *A Manual of California Vegetation*. Online. <http://davisherb.ucdavis.edu/CNPSActiveServer/intro.html#tnchp>. Site visited November 19, 2012.

USACE. Regulatory Guidance Letter No. 08-02: Jurisdictional Determinations. June 26, 2008.

USACE. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). September 2008.

Question #6

Section 10.1.0, Proposed Action (page 74): Please provide figures of the vegetation communities and designated critical habitat areas as they relate to the proposed action connected actions, and similar actions. These should be broken down by the circuit as outlined within Tables 20 and 21.

SDG&E Response:

Maps of the vegetation communities within the survey corridors and designated critical habitat areas along each of the 69 kV power lines have been provided in the BTR, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory. The corresponding GIS data were previously provided as Vegetation_Survey, which have been included as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment B: GIS Data File Directory.

USFWS-designated critical habitat and USFS-designated occupied habitat maps are also included in the locations provided in Attachment C: Map File Directory.

The BTR does not distinguish between the Proposed Action, Connected Actions, and Similar Actions. Species potentials were described in the BTR and were assessed for the entire length of each power line; therefore, species potentials were not determined separately for the Proposed Action, Connected Actions, or Similar Actions.

Question #7

Section 10.1.0, Proposed Action (page 75): Please provide more detail regarding consultations that occurred with the USFS regarding which species to include for the proposed action, connected actions, and similar actions. Was the Bureau of Land Management included in the discussions? Please outline which species were considered,

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which were chosen, and why the others were excluded. Please include a similar discussion for San Diego County Group A through D and 1 and 2 species.

SDG&E Response:

As discussed in the responses to Biological Resources Questions #2 and #4, SDG&E consulted with the USFS, the USFWS, and, to a limited extent, the CDFG. The CNF biologist provided direction that CNF-identified occupied habitat should be assumed to be occupied and did not require confirmation. The USFWS biologist concurred with this direction. Therefore, habitat assessments and focused surveys were limited to modeled potentially suitable habitat. Bureau of Land Management (BLM) was not consulted regarding which species to include in the analysis. All species identified during the literature and database reviews were considered; the BTR includes any species with the potential to occur within the area of the Proposed Projects. Species that were determined to have no potential to occur were not included in the Preliminary POD, but are discussed in the BTR. Because these documents were prepared to support the USFS MSUP and CPUC approval process, species identified as sensitive by the County (San Diego County Group A through D and 1 and 2 species) that are not otherwise protected by state or federal regulations have not been considered.

Question #8

Section 10.1.0, Proposed Action (page 75): The generic rationales for what “Present,” “High Potential,” “Moderate Potential,” “Low Potential,” and “No Potential” are generally adequate, but please provide any additional species-specific information by circuit which would help provide a robust case for inclusion or not for the proposed action, connected actions, and similar actions.

SDG&E Response:

Section 4.3 Special-Status Plant, Section 4.4 Special-Status Wildlife, Section 4.5 Special-Status Plants Within BLM Lands, and Section 4.6 Special-Status Wildlife Within BLM Lands of the BTR, and the focused survey reports—which have been provided in response to General Comments Question #2 in the locations indicated in Attachment A: Electronic File Directory—provide additional species-specific information regarding why species were included or excluded by the Proposed Projects. The BTR and survey reports describe species potentials by 69 kV power line and 12 kV distribution line.

Question #9

Section 10.1.0, Proposed Action, (page 76): Tables 20 and 21 are information-rich, but please provide figures or shapefiles outlining where the suitable habitat was determined to occur for

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the listed or fully protected, or List 1 species for the proposed action, connected actions, and similar actions.

SDG&E Response:

Figures or shapefiles outlining where suitable habitat was determined to occur have not been generated and, therefore, are not available.

Question #10

Section 10.1.0, Proposed Action (page 88): Please provide more detail and rationale regarding why the plant and wildlife special-status species were determined to have low or no potential to occur within the right-of-way (ROW) for the proposed action, connected actions, and similar actions.

SDG&E Response:

Section 4.3 Special-Status Plants, Section 4.4 Special-Status Wildlife, Section 4.5 Special-Status Plants Within BLM Lands, and Section 4.6 Special-Status Wildlife Within BLM Lands of the BTR, which has been provided previously in response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory, provide more detail regarding why plant and wildlife special-status species were determined to have a low potential or no potential to occur. The BTR does not distinguish among the Proposed Action, Connected Actions, and Similar Actions. Species potentials were described in the BTR and assessed for each 69 kV power line; therefore, species potentials were not determined separately for the Proposed Action, Connected Actions, or Similar Actions.

Question #11

Section 10.1.0, Proposed Action: Please include a list of other species observed or detected during the various survey efforts. Please include an analysis of impacts to wetland and jurisdictional wetland areas. Please provide an analysis regarding impacts to San Diego County (the County) resources. Please provide an analysis regarding USFS Management Indicator Species.

SDG&E Response:

A complete list of plant species observed is provided in Appendix B: Inventory of Plant Species Observed by Tie-Line in the Rare Plant Survey Report, which has been included as part of SDG&E's response to General Comment #2 in the location provided in Attachment A: Electronic File Directory. Incidental sightings of wildlife species observed during focused surveys are provided in the following appendices of the technical reports, which

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have been included as part of SDG&E's response to General Comment #2 in the locations provided in Attachment A: Electronic File Directory.

- Appendix B: Wildlife Species List in the Southwestern Willow Flycatcher Focused Survey Report
- Appendix F: Total Species Observed 2010 in the Arroyo Toad Focused Survey Report
- Appendix B: Wildlife Species List in the Coastal California Gnatcatcher Focused Survey Report
- Appendix B: Wildlife Species List in the Least Bell's Vireo Focused Survey Report
- Appendix B: Species List in the California Spotted Owl Focused Survey Report
- Appendix B: Butterfly Species Observed During Hermes Copper Butterfly Focused Surveys in the Hermes Copper Butterfly Focused Survey Report
- Appendix B: Butterfly Species Observed in the Quino Checkerspot Butterfly Focused Survey Report

An analysis of impacts to wetlands and jurisdictional wetland areas was provided in Section 10.4 Hydrology of the Preliminary POD.

An analysis of USFS Management Indicator Species was not conducted for the Proposed Projects as the USFS did not request this analysis. However, a similar analysis to evaluate the potential effects of the Sunrise Powerlink Project on CNF Management Indicator Species was completed in July 2010. Although the facilities and location of the Sunrise Powerlink Project are distinguishable from the activities currently proposed as part of the Proposed Projects, this assessment may be a useful background reference and is included as the USFS Management Indicator Species Assessment for the Sunrise Powerlink in the location provided in Attachment A: Electronic File Directory.

Question #12

Section 10.1.0, Proposed Action (page 88 and on): Please provide more detailed discussion about what the causes and effects of short- and long-term temporary impacts would be to vegetation communities, special-status plants, special-status wildlife species, and wetlands and jurisdictional areas for the proposed action, connected actions, and similar actions.

SDG&E Response:

The BTR, provided previously in response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory, and the Biological Resources section of the Preliminary POD include detailed discussions of potential temporary and permanent impacts to vegetation communities, and special-status plant and animal species. Section 10.4

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Hydrology of the Preliminary POD provides a detailed discussion of potential temporary and permanent impacts to hydrological resources.

Potential impacts to special-status plant species may include the temporary or permanent loss of habitat, including loss of habitat that supports the species, and loss of potential seed bank due to the excavation of pole holes, consistent with construction activities conducted for other similar wood-to-steel replacement projects. Other impacts may include potential crushing by equipment, vehicles, and personnel working within suitable or occupied habitat. Equipment and vehicles may introduce noxious weeds that compete with special-status species, or may result in petroleum product or other chemical spills that negatively affect special-status plant species and habitat. In addition, impacts such as an increase in fugitive dust could reduce the growth and vigor of special-status plant species.

Impacts to special-status wildlife species include potential crushing of individuals by equipment, vehicles, and personnel working within suitable or occupied habitat. Other impacts may include the permanent and temporary loss of habitat or the introduction of invasive weed species, which may result in the loss of vegetation that supports the species. In addition, temporary impacts to special-status wildlife species may also be caused by the disruption of hibernating, nesting, feeding, and/or breeding as a result of increased human activity such as an increase in vehicle and equipment noise.

These potential impacts would be avoided or minimized through implementation of SDG&E's standard practices and protocols, including those associated with the NCCP.

Question #13

Section 10.1.0, Proposed Action (page 88 and on): Please provide more detail regarding the NCCP process that would be followed regarding potential impacts to species, pre-activity surveys and reporting, and appropriate Operational Protocols.

SDG&E Response:

SDG&E's NCCP is a type of Habitat Conservation Plan (HCP) that was developed and approved by the USFWS and CDFG in 1995. As part of the NCCP process, SDG&E, the USFWS, and the CDFG entered into a long-term Implementing Agreement, which provides the legal obligation to implement and maintain SDG&E's HCP.

The purpose of SDG&E's NCCP is to allow SDG&E to develop, install, maintain, operate, and repair its gas and electric facilities within their service territory in San Diego County and portions of Orange and Riverside counties. SDG&E prepared its HCP following the NCCP approach authorized by the federal ESA and California Fish and Game Code. The NCCP complies with the federal ESA and CESA, and is designed to authorize take, if necessary, of

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species and habitat, as identified and described in the NCCP, and these species are referred to as “covered species” in the NCCP documentation. There is one exception to the allowed take of covered species within the NCCP; within the list of covered species, there is a subset of wildlife and plants that have been identified as narrow endemic species. Narrow endemics are species that are confined to a specific geographic region, soil type, and/or habitat. Take of narrow endemic species is limited to emergencies and unavoidable impacts from repairs to existing facilities. The following three narrow endemic species have a low potential to occur in the combined area of the Proposed Projects:

- San Diego ambrosia (*Ambrosia pumila*) has a low potential to occur along TL629 and TL6923;
- western burrowing owl (*Speotyto cunicularia hypogea*) has a low potential to occur across the entire combined areas of the Proposed Projects; and
- coastal cactus wren (*Campylorhynchus brunneicapillus*) has a low potential to occur along TL629.

However, through the implementation of the NCCP protocols described in the following paragraphs, no impacts to these species are anticipated.

The NCCP permit covers a 55-year term of federal and state resource agency approvals and oversight, with an option for the permittee to terminate the agreement after 25 years and every 10 years thereafter. The NCCP was created to protect and preserve the County’s natural resources, while at the same time reducing and streamlining the regulatory processes typically involved with the operation, maintenance, and expansion of the existing gas and electric systems within SDG&E’s service territory. Implementation of the NCCP provides assurances to SDG&E, the USFWS, and the CDFG that all covered species identified in the NCCP and their associated habitats would be protected as if they were listed under the federal or state ESAs.

SDG&E’s NCCP facilitates construction, operation, and maintenance activities by allowing these activities to commence without requiring additional federal and state ESA permitting processes. The NCCP was designed to streamline the permitting process, provide protection to covered species and their habitat, and facilitate construction activities (as described in the NCCP). This approach provides for long-term covered species and habitat protection without the need to acquire Incidental Take Permits on a species- or project-specific basis. The permit provides protection for 111 covered species and their habitat within SDG&E’s service territory. Protection of the covered species includes avoidance of impacts, whenever possible. SDG&E, in conjunction with the USFWS and the CDFG, developed 61 protective and conservation measures, known as operational protocols (field protocols), to avoid, minimize, or mitigate any impacts to covered species during construction, operation, or maintenance activities. In addition, SDG&E and contractor personnel attend regular

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environmental trainings conducted by SDG&E and/or their consultants to explain the purpose of the NCCP permit and detail specific environmental requirements that must be adhered to during construction, operation, or maintenance activities.

SDG&E's projects generally do not fall within the discretionary regulatory authority of local governments due to the CPUC preemption; therefore, the NCCP is the accepted mechanism to facilitate SDG&E's construction, operation, and maintenance activities throughout the SDG&E's area of operations.

Biological Review Process

Pursuant to the NCCP, SDG&E conducts pre-construction studies for all activities occurring off of existing access roads in natural areas. Surveys of all potential impact areas for each Proposed Project will be conducted, and a PSR outlining all anticipated impacts related to the Proposed Project will be prepared. The PSR will also include Proposed Project-specific avoidance and minimization measures, which supplement the standard operational protocols outlined in the NCCP according to Proposed Project-specific conditions. The Proposed Projects may include monitoring for all project components, as recommended by the PSR, as well as other avoidance and minimization measures determined to be necessary during the PSR process.

Forest Service Lands

For SDG&E construction, operation, and maintenance activities anticipated to occur within the administrative boundary of the CNF, USFS conducts additional review of these activities and the proposed avoidance and minimization measures. A Biological Evaluation/Biological Assessment (2006) for the federal MSUP action was previously prepared by the USFS to comply with the legal requirements set forth under Section 7 of the federal ESA and the standards set forth in Forest Service Manual 2672.4 through 2672.42.

In addition to SDG&E NCCP-covered species, species on the CNF's Regional Forester's sensitive-species list are specifically addressed when preparing PSRs for activities that will occur within the administrative boundary of the CNF. If a species is known or anticipated to occur in a Proposed Project area, the PSR will provide a discussion as to whether the species was observed or would be expected to occur within the Proposed Project area based on local habitat conditions. The PSR also discusses the potential effects of a Proposed Project's activities on the species and provide recommendations for avoiding and minimizing impacts to the species during Proposed Project activities.

PSR Reporting and Implementation

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Pursuant to the NCCP, completed PSRs (for both USFS lands and non-USFS lands) are submitted to representatives of both the USFWS and the CDFG for review and comment. The CDFG and the USFWS may recommend additional avoidance and minimization measures or post-project monitoring based on their review of a particular activity. PSRs prepared for projects located within the administrative boundary of the CNF are also submitted to the USFS for review, comment, and approval. SDG&E Environmental staff prepares an internal environmental document for each project, which includes information on the project description, detailed instructions on the environmental restrictions, and whether additional surveying or monitoring is required during construction.

Monitoring

Biological monitors may be present during a project to ensure implementation of the NCCP operational protocols and any additional avoidance and minimization measures required for a project. If the previously delineated work areas must be modified during construction due to local site conditions or construction activity requirements, the biological monitors will survey the additional work areas to determine if any sensitive resources may potentially be impacted by the proposed activities, identify any additional avoidance and minimization measures necessary to minimize potential impacts to covered species and their habitats within the additional work areas, and document any additional impacts. Any additional impacts that result in these work areas are then included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank.

Annual Reporting

Impact and mitigation calculations are submitted to the USFWS and CDFG as part of the NCCP Annual Report pursuant to the requirements of the NCCP and the NCCP Implementing Agreement.

Specific Operational Protocols

As previously discussed, SDG&E, in conjunction with the USFWS and the CDFG, developed 61 operational protocols to avoid, minimize, or mitigate any impacts to covered species during construction, operation, or maintenance activities. These operational protocols are broadly based and are applied during construction, operation, and maintenance activities as needed to protect covered wildlife species, plant species, or both depending on project-specific conditions. While the complete list of operational protocols to be applied to each Proposed Project will be finalized prior to construction depending on local conditions at the time of construction, Table 5: SDG&E NCCP Operational Protocol List identifies those operational protocols that will, at a minimum, be applied to the Proposed Projects during

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construction activities. Additionally, the following operational protocols will also be applied during operation and maintenance activities for the Proposed Projects, consistent with SDG&E's current operation and maintenance activities for the existing 69 kV power lines:

- **Operational Protocol 13:** The Environmental Surveyor shall conduct preactivity studies for all activities occurring off of access roads in natural areas. The scope of these studies is included in Appendix A. The Environmental Surveyor will complete a preactivity study form contained in Appendix A, including recommendations for review by a biologist and construction monitoring as appropriate. Biologists should be called in when there is the potential for unavoidable impacts to Covered Species. The forms are for information only, and will not require CDFG or USFWS approval. These forms shall be faxed to CDFG and USFWS, along with phone notification, who will reply within 5 working days, indicating if they would like to review the project and/or suggest recommendations for post project monitoring. If a biologist is required, he/she will be contacted concurrent to notification to CDFG and USFWS. SDG&E's project may proceed during this time if necessary, in compliance with the recommendations of the biologist (For narrow endemic species see mitigation IV following Table 3.1). USFWS survey protocols performed by qualified biologists will be required for new projects which are defined as projects requiring CEQA review. In those situations where the Environmental Surveyor cannot make a definitive species identification, an on-call biologist will be brought in. When the biologist is called he or she will be contacted concurrently with CDFG and USFWS. The biologist will make the determination of the species in question and recommend avoidance or mitigation approaches to the Environmental Surveyor and a decision will be made. In those situations where more than one visit may be necessary to identify a given species, such as certain birds, no more than three site visits shall be required. It is expected that the typical USFWS search protocols will not be utilized in most situations due to the Plan's avoidance priority. Background information necessary to complete the annual report shall be collected on the preactivity study form and used by SDG&E to prepare the annual report.
- **Operational Protocol 14:** In order to ensure that habitats are not inadvertently impacted, the Environmental Surveyor shall determine the extent of habitat and flag boundaries of habitats which must be avoided. When necessary, the Environmental Surveyor should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the Environmental Surveyor shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project specific basis.

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- Operational Protocol 16: Maintenance, repair and construction Activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.
- Operational Protocol 25: Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable.
- Operational Protocol 35: The Environmental Surveyor shall conduct monitoring as recommended in the preactivity survey report. At completion of work, the Environmental Surveyor shall check to verify compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the Environmental Surveyor is responsible for removing all habitat flagging from the construction site.

These operational protocols delineate SDG&E's requirement to prepare a PSR evaluating the Proposed Project's activities and potential impacts to covered species, specify how the NCCP is to be applied during Proposed Project activities, describe how SDG&E will incorporate local conditions during Proposed Project design to avoid and minimize potential impacts, and define general monitoring requirements to verify compliance and ensure identified sensitive areas are avoided during Proposed Project activities. As described in the Preliminary POD and consistent with NCCP Operational Protocol 16, SDG&E included all collected data and information regarding local conditions and covered species potentials during design activities for the Proposed Projects to identify construction locations and associated work areas that will avoid or minimize impacts to covered species and other sensitive environmental resources to the greatest extent practicable.

In addition to the operational protocols described previously, the NCCP Implementing Agreement includes a trigger for requiring a PCR in Section 9. Monitoring and Reporting:

- 9.1 During the term of this Agreement, SDG&E will continuously monitor and maintain a written record of the amount and type of Habitat lands within the Subregional Plan Area impacted by its Activities, whether such impacts were within or outside of Preserve Areas, and whether such impacts were "permanent" or "temporary"

As described in Section 9.2, however, individual PCRs are not submitted to the USFWS and the CDFG for each Proposed Project, but are included in a single annual report:

- 9.2 SDG&E will prepare and submit to USFWS and CDFG...a single annual report describing (a) amount and type of impacted habitat, (b) Activity causing the impact to

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Habitat (C) amount of impacted Habitat within Preserve Areas, (d) and whether such Habitat was mitigated by Habitat enhancement techniques or Mitigation credits.

References

SDG&E. 1995. Subregional Natural Community Conservation Plan Implementation Agreement/CESA Memorandum of Understanding – Entered Into By and Among United States Fish and Wildlife Service, California Department of Fish and Game, and San Diego Gas & Electric Company.

Question #14

Section 10.1.0, Proposed Action (page 88 and on): For each special-status species analysis paragraph, please provide more detail regarding the NCCP protocols to be used. At a minimum, include these within a descriptive table for easier reviewer reference.

- a. For Hermes copper butterfly (*Lycaena hermes*): Were host plants detected, and what was their proximity to the work area? Are there any specific measures to protect the host plants?
- b. For Quino checkerspot butterfly (*Euphydryas editha quino*): Please provide more detail regarding the anticipated impacts and proposed mitigation measures.
- c. The figure included for Laguna Mountains skipper (*Pyrgus ruralis lagunae*) is useful. Please provide similar figures for the other listed species.
- d. Please indicate if there is a Limited Operating Period in place for spotted owl (*Strix occidentalis*).
- e. Please indicate what specific nesting buffers are proposed.
- f. Please indicate the timing of buffer establishment.
- g. Please indicate what the process is for identifying whether golden eagles (*Aquila chrysaetos*) are nesting within line of sight or in proximity to the project. Please identify the specific proposed measures to protect the golden eagles.
- h. Please explain why the California gnatcatcher (*Poliophtila californica*) was not addressed in the Preliminary Plan of Development. Is it because the elevation/range excludes their potential?
- i. Please specify what methods will be used to identify bat roosts.

SDG&E Response:

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Table 5: SDG&E NCCP Operational Protocol List, provided previously as part of SDG&E's response to Biological Resources Question #3, describes each NCCP protocol to be implemented for special-status species with the potential to occur in the Proposed Projects area. SDG&E will also implement any additional measures that are identified during the PSR process prior to construction, as well as any measures that are required by the USFWS and CDFG based on the PSR process.

a. Spiny redberry/host plant locations were mapped and recorded during the 2010 focused plant surveys. Details are provided in the for Hermes Copper Butterfly Focused Survey Report, which has been included as part of SDG&E's response to General Comments #2 in the location provided in Attachment A: Electronic File Directory. Hermes copper butterfly is a candidate for federal listing under the ESA; however, Hermes copper butterfly is not federally or state-listed as endangered or threatened. Therefore; no species-specific measures were identified to protect Hermes copper butterfly host plants. Host plant species will be protected through implementation of NCCP protocols that require pre-construction surveys to flag sensitive biological resources for avoidance prior to construction. Host plant species located within these avoidance areas will therefore be protected by their inclusion within the avoidance area. In addition, NCCP protocols require that vegetation removal be monitored and minimized to the extent feasible; any host plants identified by biological monitors during these activities will be flagged for avoidance.

b. Impacts to Quino checkerspot butterfly (QCB) include potential crushing of larvae or adults by equipment, vehicles, and personnel working within suitable or occupied habitat. Other impacts may include the permanent and temporary loss of habitat, including loss of vegetation (e.g., larval host plants and adult nectaring plants) that supports the species. Vehicles and equipment may introduce noxious weeds, which have the potential to outcompete QCB host and nectar plants. In addition, an increase in fugitive dust could reduce the growth and vigor of host and nectar plant species.

SDG&E will mitigate potential impacts to QCB from the Proposed Projects' construction activities by implementing SDG&E's Low-Effect HCP for the QCB. This HCP emphasizes protection of habitat through impact avoidance and use of operational protocols designed to avoid or minimize impacts to the QCB. The HCP was prepared in consultation with the USFWS to fulfill the requirements of SDG&E's Section 10(a)(1)(B) permit application for the aforementioned proposed activities. The HCP protocols require SDG&E to conduct protocol-level adult QCB flight season surveys within suitable QCB habitat prior to construction and submit the 45-day QCB Survey Results Report to the USFWS and the CPUC. If the timing of a Proposed Project will not allow for adult flight season surveys to determine the presence or absence of QCB in the Proposed Project area, it will be assumed that the identified suitable QCB habitat is occupied. The HCP protocols also include

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mitigating for impacts to QCB occupied habitat at a two-to-one ratio, and mitigating for impacts to QCB suitable habitat at a one-to-one ratio. In addition, HCP protocols will require crew training, monitoring during clearing and grading activities, and reducing speeds to 15 miles per hour along a Proposed Project's access roads to reduce fugitive dust.

c. USFWS-designated critical habitat and USFS-designated occupied habitat maps for the other federally and state-listed and candidate species with the potential to occur in the combined area of the Proposed Projects have been included as part of SDG&E's response to Biological Resources Question #6 in the locations provided in Attachment C: Map File Directory.

d. There is currently no Limited Operating Period in place for spotted owl for the Proposed Projects; the USFS provides guidance on when construction activities should occur according to project-specific requirements. Spotted owl has the potential to occur in the Proposed Project area for TL682. Prior to construction, SDG&E will coordinate with the USFS to define a Limited Operating Period for this Proposed Project as needed.

e. SDG&E will implement the NCCP operational protocols identified in Table 5: SDG&E NCCP Operational Protocol List as well as any additional operational protocols or other specific avoidance and minimization measures identified for inclusion during the PSR process for a Proposed Project. Additionally, SDG&E will coordinate with the USFWS and the CDFG prior to construction of the Proposed Project construction to ensure compliance with the Migratory Bird Treaty Act and other applicable federal and state regulations protecting bird nests.

f. SDG&E will coordinate with the USFWS and the CDFG as part of the PSR process prior to construction of a Proposed Project to identify any required nesting buffers for a Proposed Project according to local conditions and anticipated construction activities.

g. Golden eagle is a covered species under the NCCP and therefore will be evaluated during the PSR process. Prior to the start of construction activities for a Proposed Project, SDG&E will conduct the PSR process described in the NCCP. During the PSR process, SDG&E will work with the CDFG, the USFWS, and the USFS to identify any additional potential nesting areas. SDG&E will observe any necessary nesting buffers as determined during the PSR process prior to the start of construction based on each Proposed Project's local conditions and golden eagle nesting status. In addition, implementation of the NCCP operational protocols and other avoidance and minimization measures identified prior to construction will provide incidental protection to golden eagles.

h. The California gnatcatcher (*Poliophtila californica*) does not have any protection status; therefore, it is not assessed in the Preliminary POD. The Coastal California gnatcatcher

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subspecies (*Polioptila californica californica*) is the only protected subspecies of California gnatcatcher. Coastal California gnatcatcher is federally listed as threatened and is a CDFG Species of Species Concern, and is described in the Preliminary POD as having a high potential to occur along TL625. A discussion of potential impacts to this subspecies as well as the avoidance of these potential impacts is provided in Section 10.1 Biological Resources of the Preliminary POD. This species is also addressed in detail in the Coastal California Gnatcatcher Focused Survey Report and Section 3.1.4: Focused Sensitive Wildlife Surveys and Section 4.4.31 Coastal California Gnatcatcher of the BTR, which have been provided as part of SDG&E's response to General Comment #2 in the locations provided in Attachment A: Electronic File Directory.

i. SDG&E does not anticipate encountering special-status bat species during construction of the Proposed Projects, as the majority of local bat species nest in caves, rock crevices, old buildings, and other roosting areas outside the combined area of the Proposed Projects. If special-status bat species are identified during the PSR process, however, where construction activities may occur near areas with the potential for bat roosts, SDG&E will develop and implement an exclusion buffer, where practicable, during the maternity season for the species to avoid or minimize potential impacts. The size of the buffer zone will be established by the qualified biologist based on the species' sensitivity to the potential disturbances identified for the construction activities occurring within the area of potential impact.

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Cultural Resources

Question #1

Based on review of the summary of cultural resource investigations completed for this project, including the impacts assessments, there is sufficient information to develop a joint environmental impact report/environmental impact statement (EIR/EIS) for this project. However, please provide copies of the cultural resources technical reports, including the records search/literature review, as well as all documentation of Native American consultation and correspondence.

SDG&E Response:

The Inventory, Evaluation, and Treatment of Cultural Resources - Confidential has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

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Noise

Question #1

In addition to the information included in the POD, please provide the Noise and Vibration Technical Report.

SDG&E Response:

The Technical Noise Study Report has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #2

Please identify applicable National Environmental Policy Act (NEPA) noise and vibration criteria such as those identified in US DOT FTA 2006, as well as all applicable County noise thresholds including impulsive noise and noise criteria for public utility transmission facilities.

SDG&E Response:

The applicable noise and vibration criteria and thresholds are provided in Section 2.1 Guidelines for the Determination of Significance of the Technical Noise Study Report, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #3

Please provide an existing conditions section identifying existing land uses, noise sensitive receptors, and ambient noise levels.

SDG&E Response:

Existing land uses, noise-sensitive receptors, and ambient noise levels have been provided in CNF Existing Conditions, which has been provided as part of SDG&E's response to General Comment Question #3 in the location provided in Attachment A: Electronic File Directory.

Question #4

Please include a description of the noise methodology and equipment.

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SDG&E Response:

A description of the noise methodology and equipment is provided in Section 1.3 Methodology and Equipment of the Technical Noise Study Report, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #5

Please evaluate impacts based on the applicable criteria. Please note, the County's construction noise thresholds apply at the boundary line of the property where the noise source is located or any occupied property where the noise is being received. Therefore, please discuss/determine noise impacts relative to these locations and provide a table or figure that identifies the properties subject to noise levels in excess of the County's noise ordinance criteria or NEPA thresholds.

SDG&E Response:

Applicable criteria regarding potential noise impacts are described in CNF Existing Conditions, which has been provided as part of SDG&E's response to General Comment #3 in the location provided in Attachment A: Electronic File Directory. Table 7: Residential Parcels Within Zones of Potential Construction Noise Impacts identifies the number of residential parcels of which one or more property boundaries fall within the zones of potential construction noise impacts for the Proposed Projects. Approximately 490 parcels have a property boundary within one or more zones of potential Proposed Project construction noise impacts. Approximately 123 of these parcels, or approximately 15 percent of all residential parcels within 590 feet of the Proposed Projects' components, have one or more property boundaries within 590 feet of the staging areas and fly yards for the Proposed Projects. Of these 123 parcels, approximately 76 have residences within 590 feet of staging areas and fly yards for the Proposed Projects. Potential noise impacts at these areas will be similar to those described for construction activities (and accompanying helicopter operation) at helicopter-set micro-pile foundation poles, as described in the Preliminary POD and the Technical Noise Study Report, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

References

SanGIS. Parcels. Online. <http://www.sangis.org/download/index.html>.

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Question #6

Please identify existing corona discharge noise level and confirm that the project will not exceed the County's applicable noise criteria for public utility transmission facilities.

SDG&E Response:

Existing noise levels are provided in Section 1.2.2 Existing Noise Conditions Along Transmission Lines and Section 12.3 Existing Noise Conditions Along Distribution Lines of the Technical Noise Study Report, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory. The Proposed Projects will not exceed the County's applicable noise criteria for public utility transmission facilities during operation and maintenance activities, including corona noise, as discussed in Section 2.2 Potential Impacts of the Technical Noise Study Report.

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Table 7: Residential Parcels Within Zones of Potential Construction Noise Impacts²

Activity	Distance to $L_{eq}^3 = 75$ A-Weighted Sound Pressure Level (dBA) (feet)	Number of Residential Parcels ⁴ Impacted
Improve Access Roads	<25	22
Construct Micro-pile Pole Foundation (Helicopter Set)	590	64
Construct Micro-pile Pole Foundation (Truck Set)	180	233
Construct Direct-Bury Pole (Helicopter Set)	330	79
Construct Direct-Bury Pole (Truck Set)	190	271
Pole Removal (Ground Access)	<25	4
Pole Removal (No Ground Access)	280	1
String Conductor	100	317
Restore ROW	150	361
Use Staging Area/Fly Yard	590	123

Source: SanGIS, 2012.

Question #7

Please identify potential blasting noise and vibration levels as an alternative method for steel pole installation, compare to County’s noise limits (both $L_{eq}(8)$ and impulsive noise level limits) and applicable vibration thresholds.

SDG&E Response:

Rock splitting/blasting was considered in the noise analysis, as described in Section 1.1.3.4.1 Direct-bury Steel Poles of the Technical Noise Study Report, which has been provided as part of SDG&E’s response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory. Sensitive receptors within approximately 190 feet of a truck-set direct-bury steel pole or within approximately 330 feet of a helicopter-set direct-bury steel pole may experience noise in excess of the County’s noise significance

² A residential parcel may be located within more than one zone of potential construction noise impacts.

³ L_{eq} is an average of the time-varying sound energy for a specified time period.

⁴ Residential parcels were determined based on whether one or more dwelling units were identified in the parcel data obtained from SanGIS.

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guideline for the one to two days of construction activity at that site, as described in Section 3.3 Potential Construction Noise Impacts of the Technical Noise Study Report. Sensitive receptors within approximately 60 feet of most construction activities may experience vibration in excess of the County vibration significance guideline for infrequent events, as described in Section 4 Construction Ground-borne Vibration Impacts of the Technical Noise Study Report.

Question #8

Please include a discussion of the noise and vibration impacts associated with the undergrounding (jack-and-bore or trenching construction).

SDG&E Response:

Sensitive receptors within approximately 150 feet of the undergrounding activities may experience noise and vibration in excess of the County's noise significance guideline, as described in Section 3.3 Potential Construction Noise Impacts of the Technical Noise Study Report, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory. No sensitive receptors within approximately 150 feet of planned undergrounding activities for the Proposed Projects have been identified.

Question #9

Please either identify where helicopters could operate between 6:30 a.m. and 7 a.m., or state a minimum setback distance helicopters would operate from all occupied properties between 6:30 a.m. and 7:00 a.m. and what the noise level would be with the setback distance.

SDG&E Response:

Helicopters may fly from their overnight locations to the fly yards in order to start construction at 7:00 a.m. Between 6:30 a.m. and 7:00 a.m., helicopters will maintain a minimum setback distance of 600 feet from all occupied residences on the approach to the staging areas and fly yards, where possible, according to weather and safety conditions. With this 600-foot setback distance, noise levels from these activities will be below 75 dBA at ground level.

Question #10

Please review the APMs relative to the identification of the noise impact at the boundary line of the property where the noise source is located or any occupied property where the noise is being received.

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SDG&E Response:

SDG&E evaluated the potential for noise impacts according to both the location of the boundary lines of potentially affected parcels (consistent with the County's construction noise thresholds) as well as the location of residential structures on parcels identified by SanGIS as having at least one dwelling unit. As described in SDG&E's response to Noise Question #5 and shown in Table 7: Residential Parcels Within Zones of Potential Construction Noise Impacts, noise levels from construction activities may exceed the County's 75 dBA threshold at residential property boundaries during construction of the Proposed Projects.

Based on a review of County and SanGIS data, aerial photos, and information gathered during field surveys for the Proposed Projects, SDG&E determined that parcel sizes in the combined area of the Proposed Projects are generally large, and dwelling units are typically located some distance away from their property boundaries. SDG&E also evaluated the location of residences on potentially affected parcels to determine the number of residences where construction noise may exceed the County's 75 dBA threshold. All parcels identified by the County as having at least one dwelling unit were evaluated to determine whether those parcels' residences are located within an area where construction noise may exceed the County threshold; SDG&E assumed each parcel's residence to be the closest building to the construction activity—any buildings further away would therefore have even lower construction noise impacts.

Whereas approximately 490 unique parcels may have construction noise levels at their property boundaries in excess of the County's 75 dBA threshold, only approximately 280 residences on these parcels may experience construction noise in excess of this threshold. Of these 280 residences, approximately 178 may experience construction noise in excess of the County threshold from more than one construction activity. Table 8: Residences Within Zones of Potential Construction Noise Impacts shows the number of residences potentially affected by each construction activity. A list of parcels containing residences within areas where the County's noise threshold may be exceeded is provided at the location shown in Attachment A: Electronic File Directory.

Based on SDG&E's analysis of potential construction noise impacts at property boundaries and on residences located on those properties, SDG&E developed APM-NOI-05 to be implemented where noise thresholds at residences are anticipated to exceed the County's 75 dBA threshold.

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Table 8: Residences Within Zones of Potential Construction Noise Impacts⁵

Activity	Distance to $L_{eq}^6 = 75$ A-Weighted Sound Pressure Level (dBA) (feet)	Number of Residences ⁷ Impacted
Improve Access Roads	<25	0
Construct Micro-pile Pole Foundation (Helicopter Set)	590	29
Construct Micro-pile Pole Foundation (Truck Set)	180	90
Construct Direct-Bury Pole (Helicopter Set)	330	30
Construct Direct-Bury Pole (Truck Set)	190	103
Pole Removal (Ground Access)	<25	0
Pole Removal (No Ground Access)	280	0
String Conductor	100	114
Restore ROW	150	174
Use Staging Area/Fly Yard	590	76

Sources: SanGIS, 2012; Google, 2012.

Question #11

Please discuss proximity of proposed staging areas or fly yards to occupied properties, and if nearby, please describe potential noise impacts at these areas.

SDG&E Response:

A total of 123 residential parcels have one or more property boundaries within 590 feet of the staging areas and fly yards for the Proposed Projects. Of these parcels, approximately 76 residences are located within 590 feet of staging areas and fly yards for the Proposed Projects. Potential noise impacts at these areas will be similar to those described for construction activities (and accompanying helicopter operation) at helicopter-set micro-pile foundation poles. These impacts are described in the Preliminary POD and the Technical

⁵ A residential parcel may be located within more than one zone of potential construction noise impacts.

⁶ L_{eq} is an average of the time-varying sound energy for a specified time period.

⁷ Residential parcels were determined based on whether one or more dwelling units were identified in the parcel data obtained from SanGIS.

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Noise Study Report, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #12

Please identify which residents, as discussed in APM-NOI-07, are anticipated to exceed the applicable noise thresholds, and how it will be determined that the residences will experience noise levels in excess of applicable noise thresholds. Please indicate where the residents will be relocated and whether relocation expenses will be paid/reimbursed.

SDG&E Response:

A list of residential parcels with property boundaries within the zones of potential construction noise impacts for the 69 kV power lines has been provided as CNF Noise Impacted Residential Parcels in the location provided in Attachment A: Electronic File Directory. Approximately 490 residential parcels may be affected by noise levels in excess of the County noise threshold of 75 dBA for construction activities. These residential parcels were determined by buffering the Proposed Projects components by the distance where L_{eq} is 75 dBA for each construction activity, which has been provided in Table 7: Residential Parcels Within Zones of Potential Construction Noise Impacts as part of SDG&E's response to Noise Question #5.

Additionally, SDG&E evaluated the number of residences located within the 75 dBA noise threshold buffer to determine the number of sensitive receptors that may be impacted by construction noise. Approximately 280 unique residences may experience construction noise in excess of the County's 75 dBA noise threshold. Residents will be given the option of relocation, and those who choose to be relocated will be accommodated according to discussions with the resident prior to construction. Residents will be provided reasonable accommodations located in proximity to the residence.

Question #13

Please quantify/discuss the residual impact after mitigation.

SDG&E Response:

The Preliminary POD included APMs to reduce noise impacts. Most of the APMs are standard operating procedures and are therefore incorporated into the baseline assessment for the Proposed Projects. Because these APMs do not ensure that potential noise impacts remain below the County noise standard, APM-NOI-05—which requires that when stationary noise-generating equipment is used within 80 feet of a sensitive receptor, a temporary noise barrier with an effective height of approximately three feet will be placed

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between the property and stationary noise-generating equipment during use—has been included as an additional APM in the Preliminary POD. The following discussion provides the residual noise impacts after installation of a noise barrier.

Diesel-powered equipment has most of its sound energy in the lower frequencies and represents a worst-case scenario. Table 9: Temporary Barrier Attenuation at 80 Feet provides the A-weighted noise reduction of a typical diesel-powered piece of equipment.

Table 9: Temporary Barrier Attenuation at 80 Feet

Frequency (Hertz)	Sound Level at the Receiver without Barrier (dB)	Approximate Barrier Attenuation ⁸ (dB)	Attenuated Sound Level and the Receiver (dB)
63	76.0	-6.5	69.5
125	81.0	-9.0	72.0
250	84.0	-11.7	72.3
500	79.0	-14.6	64.4
1,000	77.0	-17.5	59.5
2,000	74.0	-20.0	54.0
4,000	68.0	-20.0	48.0
8,000	62.0	-20.0	42.0

Table 9: Temporary Barrier Attenuation at 80 Feet indicates the sound level at a receiver located 80 feet from the noise source, the approximate attenuation created by the barrier, and the resulting sound level at the receiver with the barrier installed. Typically, the maximum attenuation possible is approximately 20 decibels (dB).

The barriers will be installed within three feet of the noise source and will be approximately three feet taller than the piece of equipment. The distance between the barrier and the piece

⁸ The attenuation ΔL is approximated by:

$$\Delta L = 10 \times \log(1 + 20N)$$

where N is the Fresnel number:

$$N \cong Hb_{eff}^2 \times \frac{1}{\lambda} \times \left(\frac{1}{Dsb} \times \frac{1}{Dbr} \right)$$

Hb_{eff} is the effective height of the barrier, Dsb is the distance from the receiver to the barrier, and Dbr is the distance between the barrier and the source.

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of equipment may be adjusted to ensure safe equipment operation. Construction at each work area within 80 feet of a residence is anticipated to be short term, lasting only a few days. The temporary noise barriers will be removed at the end of the noise-generating activities at each location.

Question #14

Please provide the same level of detail for the connected actions and similar actions scenarios as the proposed action.

SDG&E Response:

The Connected Actions and Similar Actions are located in the same general areas as the Proposed Action. Because the variation amongst the three action types (Proposed Action, Connected Actions, and Similar Actions) is based solely on regulatory jurisdiction rather than any resource-related distinction, the detailed discussion regarding construction and operation and maintenance activities, the potential impacts from these activities, and the proposed measures to reduce or eliminate these impacts was provided in the first section under each resource; in this case, the Proposed Action is discussed first, so the detailed discussion was provided in that section. In order to reduce the amount of duplicative text, the Connected Actions and Similar Actions discussions refer back to the Proposed Action's detailed discussions, where appropriate, to incorporate by reference the relevant information for the reader. Where data are distinct, or unique conditions exist for the Connected Actions or Similar Actions, those differences are discussed in the appropriate section of the Preliminary POD.

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Visual Resources

Question #1

Pages 140 and 141 of the POD detail the USFS Scenery Management System (SMS) and scenic integrity objectives (SIOs) applicable to the proposed action. Please provide maps and GIS data depicting the SIOs on lands that would be traversed by the proposed action.

SDG&E Response:

A map depicting the SIOs is included as CNF Scenic Integrity in the location provided in Attachment C: Map File Directory. GIS data for the SIOs is included as USFS-SIO in the location provided in Attachment B: GIS Data File Directory.

Question #2

Please provide of summary or table identifying the visual resource policies of relevant land use plans that are applicable to the proposed action, connected actions, and similar actions.

SDG&E Response:

Visual resource policies of land use plans that are relevant to the Proposed Action, Connected Actions, and Similar Actions are provided in Appendix A: Policy Consistency Analysis of the Visual Resources Technical Study, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment A: Electronic File Directory.

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Wilderness and Recreation

Question #1

Please include user information for the Pine Creek Wilderness Area and the Hauser Wilderness. How many visitors do these wilderness areas receive per month/per year? Are there any trailheads, campgrounds, or other facilities located in these wilderness areas? From where and how does the public access these areas? Are there any water sources (natural or man-made such as drinking fountains) within these areas?

SDG&E Response:

The USFS does not collect information about the number of visitors to wilderness areas; therefore, this information is not available.

Pine Creek Trail, Horsethief Trail, and Espinosa Trail run through Pine Creek Wilderness Area. No trailheads, campgrounds, or other facilities are located within the wilderness area. Access to the wilderness area is from the Pine Creek Trailhead on Lyons Valley Road, approximately 1.5 miles south of Japatul Road. No drinking fountains are located within the Pine Creek Wilderness Area, but Pine Creek is a natural water source.

The Pacific Crest National Scenic Trail runs through Hauser Wilderness Area. No trailheads, campgrounds, or other facilities are located within the wilderness area. The wilderness area contains one campground—Hauser Creek Campground. Access to the wilderness area is along the Pacific Crest National Scenic Trail from the Lake Morena County Campground. There are no drinking fountains within the Hauser Wilderness Area, but Cottonwood Creek is a natural water source.

References

Bleedhorn, Spencer. USFS Descanso Ranger District. Personal communication with E. Carrillo, Insignia Environmental. October 9, 2012. (619) 445-6235.

Question #2

Please characterize the nature of temporary restrictions of recreational activities on Cleveland National Forest land. For example, how long would pole replacement take at each site and where would project activities result in the closure of recreational facilities? The POD states that access restrictions could occur where new or existing poles are located within or adjacent to recreational facilities such as trails or campgrounds. Please identify all recreational facilities/resources (including those located on San Diego County jurisdictional lands) that could potentially be affected by project activities.

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SDG&E Response:

Restrictions will be temporary and short-term, generally lasting approximately one to two days per recreational facility. The following trails may be temporarily restricted:

- Barrett Lake Trail
- Big Potrero Truck Trail
- Boulder Creek Road Pathway
- Buckman Springs Road Pathway
- California Riding and Hiking Trail
- Cameron Truck Trail
- Carveacre Trail
- Descanso Valley Pathway
- Glens Trail
- Hunters Camp Trail
- Japatul Trail
- Kitchen Creek Trail
- La Posta Trail
- Lake Morena Drive Pathway
- Lake Trail
- Manzanita to Lake Trail
- Meadow Trail
- Old Highway 80 Pathway
- Pacific Crest National Scenic Trail
- Phelps/Cameron Connector Trail
- Pine Creek Road Pathway
- Private Road Trail
- Sequan Truck Trail Pathway
- Skye Valley Trail
- South Loveland Reservoir Trail
- SR-76 Pathway
- Trans County Regional Trail
- Unknown Trail
- Wildwood Glen Lane Pathway

La Jolla Campground and Laguna Campground may also be temporarily restricted.

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Traffic and Transportation

Question #1

Please provide the same level of detail for the connected actions and similar actions scenarios as the proposed action.

SDG&E Response:

The Connected Actions and Similar Actions are located in the same general areas as the Proposed Action. Because the variation amongst the three action types (Proposed Action, Connected Actions, and Similar Actions) is based solely on regulatory jurisdiction rather than any resource-related distinction, the detailed discussion regarding construction and operation and maintenance activities, the potential impacts from these activities, and the proposed measures to reduce or eliminate these impacts was provided in the first section under each resource; in this case, the Proposed Action is discussed first, so the detailed discussion was provided in that section. In order to reduce the amount of duplicative text, the Connected Actions and Similar Actions discussions refer back to the Proposed Action's detailed discussions, where appropriate, to incorporate by reference the relevant information for the reader. Where data are distinct, or unique conditions exist for the Connected Actions or Similar Actions, those differences are discussed in the appropriate section of the Preliminary POD.

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ATTACHMENTS

Attachment F

Question #1

Key Viewpoint (KVP) locations. Please provide GIS data and, if possible, KMZ files, for each of the KVP locations. Information regarding the specific location of each KVP is necessary in order to accurately describe the KVP and identify user groups.

SDG&E Response:

GIS data for each of the KVP locations is included as CNF_KVP_Locations Shapefile, which has been provided as part of SDG&E's response to General Comment Question #2 in the location provided in Attachment B: GIS Data File Directory. KMZ files for each of the KVP locations are included as CNF KVP Locations in the location provided in Attachment B: GIS Data File Directory.

Question #2

For all KVP photos and simulations, detail the user groups and viewing conditions to project components from each KVP. Who would be afforded views of project components from the KVP locations, and what is the distance of the KVP to existing poles/proposed project components? For example, in Visual Simulation—Hauser Mountain near Pacific Crest Trail (KVP 55), what user group types are afforded this view, and what is the distance of replacement pole locations/pole location to the KVP location?

SDG&E Response:

The user groups and viewing conditions to the Proposed Projects' components from each KVP are detailed in the Visual Resources Technical Study, which has been provided as part of SDG&E's response to General Comment Question #2. The distance of each KVP to the existing/Proposed Projects' components has been included as CNF Distances from KVPs to Proposed Projects Poles in the location provided in Attachment A: Electronic File Directory.

Question #3

Visual Simulation—Hauser Mountain near Pacific Crest Trail (KVP 55) indicates that the KVP is located near the Pacific Crest Trail. Please include the alignment of Pacific Crest Trail on Attachment F (TL 6923, sheet 5 of 11). If the trail in KVP 55 shown as located adjacent to the TL 6923 alignment is the Pacific Crest Trail, then a KVP should be situated on the trail to represent the true visual experience of a recreationist.

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SDG&E Response:

A revised figure for Attachment F: Visual Simulations (TL6923 - Sheet 5 of 11) with the alignment of Pacific Crest Trail is included as CNF Attachment F Visual Sims TL6923 in the location provided in Attachment C: Map File Directory.

KVP 55 provides a view of TL6923 where it crosses the Pacific Crest National Scenic Trail. This is a relatively remote location; therefore, the photograph used for the simulation was taken during a helicopter survey of the area. The simulation approximates hikers' views along the trail, as described in Section 4.3 Visual Change of the Visual Resources Technical Report, which has been provided as part of SDG&E's response to General Comments Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #4

Visual Simulation—Japatul Valley Road (KVP 7). As shown in the existing conditions photograph and the accompanying visual simulation of the project, KVP 7 is situated on the southbound travel lane of Japatul Valley Road. Please indicate the alignment of Japatul Valley Road on Attachment F (TL 625, sheet 1 of 11) and include text for Japatul Valley Road on the figure to clarify the location of KVP 7.

SDG&E Response:

A revised figure for Attachment F: Visual Simulations (TL625 – Sheet 1 of 11) with the alignment of Japatul Valley Road is included as CNF Attachment F Visual Sims TL625 in the location provided in Attachment C: Map File Directory.

Question #5

Visual Simulation— La Jolla Indian Reservation (KVP 43). What is the distance of pole locations to the residence in the foreground and to the KVP location? Also, what is the significance of the KVP location? Please clarify the user groups afforded views of the project from KVP 43.

SDG&E Response:

The distance of each KVP to the existing/Proposed Projects' components is included in CNF Distances from KVPs to Proposed Projects Poles, which has been provided as part of SDG&E's response to Attachment F Question #2 in the location provided in Attachment A: Electronic File Directory. KVP 43 represents a residential view of the Proposed Projects taken in one of the more densely settled parts of the La Jolla Indian Reservation, as discussed in Section 4.3 Visual Change of the Visual Resources Technical Study, which has been provided as part of SDG&E's response to General Comments Question #2 in the location

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provided in Attachment A: Electronic File Directory. In addition, KVP 43 was requested by the La Jolla Band of Luiseno Indians.

Question #6

Visual Simulation—Boulder Creek Road near Tule Springs Road (KVP 19). What is the distance of pole locations to the residence in the foreground and to the KVP location?

SDG&E Response:

The distance of each KVP to the existing/Proposed Projects' components is included in CNF Distances from KVPs to Proposed Projects Poles, which has been provided as part of SDG&E's response to Attachment F Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #7

Visual Simulation—Boulder Oaks Campground (KVP 33). What is the distance of pole locations to the campground and KVP location (campsite)? From which campsite (#) is KVP oriented?

SDG&E Response:

The distance of each KVP to the existing/Proposed Projects' components is included in CNF Distances from KVPs to Proposed Projects Poles, which has been provided as part of SDG&E's response to Attachment F Question #2 in the location provided in Attachment A: Electronic File Directory.

Question #8

Visual Simulation—SR 76 near Palomar Mountain Road (KVP 42). What is the distance of KVP 42 to Palomar Mountain Road? What is the distance of replacement poles simulated in KVP 42 to SR-76? Also, it appears that two distribution poles are located within the TL 682 alignment and that these poles would be replaced as part of the Connected Actions. Please confirm and identify which distribution line would be affected.

SDG&E Response:

The distance of each KVP to the existing/Proposed Projects' components is included in CNF Distances from KVPs to Proposed Projects Poles, which has been provided as part of SDG&E's response to Attachment F Question #2 in the location provided in Attachment A: Electronic File Directory. The two distribution poles (P112105 and P714736) are interset

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between 69 kV power line poles, are part of TL682, and will be replaced as part of the Connected Actions to the MSUP Proposed Action.

Question #9

Please provide high quality JPEGs and PDFs of existing conditions photos and visual simulations for each of the KVPs included in Attachment F. The JPEGs and PDFs shall consist of images only (please do not provide individual JPEG and PDF files of pages from Attachment F).

SDG&E Response:

JPEGs and PDFs of existing condition photos and visual simulations for each of the KVPs are included in the locations provided in Attachment A: Electronic File Directory.

Question #10

Provided below is a summary table that approximates the number of visible existing poles and proposed poles as depicted in the various KVP photos and simulations. The proposed height of replacement poles is also provided and is based on the information provided in Tables 1 and 2 of the Preliminary Plan of Development. The differentiation between existing and proposed conditions is important as this information will form the basis of the impact analysis. Please review and revise. Please note that the height of existing transmission and distribution structures was not provided in Attachment C, Typical Drawings, and therefore, the entirety of the Approximate (Approx.) Height column for existing pole structures is blank (?).

Key Viewpoint (KVP)	# Existing Pole Structures (tangent/angle)	Approx. Height (feet)	# Proposed Pole Structures (tangent/angle)	Max. Height (feet)
3	5 (H-frame)	?	5 (angle)	120
7	5 (tangent)	?	5 (tangent)	120
10	3 (H-frame)	?	3 (angle)	120
14	4 (tangent)	?	4 (angle)?	120
17	5 (tangent)?	?	5 (tangent)	100
19	3 (tangent)	?	3 (tangent)	100
21	10 (tangent)	?	10 (tangent)	100
27	3 (1 tangent, 2 angle)	?	3 (1 tangent, 2 angle)	110
28	3 (2 tangent, 1 angle)	?	4 (3 tangent, 1 angle)	110
33	TL 629 (3 tangent, 1 angle)	?	TL 629 (4 angle poles, 2 tangent)	110
	C449 (3 dist. poles, 1 H-frame pole)	?	C449 (2 tangent dist. poles)	52

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Key Viewpoint (KVP)	# Existing Pole Structures (tangent/angle)	Approx. Height (feet)	# Proposed Pole Structures (tangent/angle)	Max. Height (feet)
37	1 (H-frame)	?	1 (tangent)	110
42	7 (5 tangent, 2 distribution poles)	?	7 (5 tangent, 2 distribution poles)?	110 (tangent poles) 38.5 (dist. poles)?
43	3 (2 tangent, 1 angle)	?	3 (2 tangent, 1 angle)	110
48	3 (tangent)	?	3 (tangent)	110
55	3 (tangent)	?	3 (1 tangent, 2 angle)	100
59	1 (dist. pole)	?	Removal of 1 dist. pole	—
60	5 (dist. poles, tangent)	?	5 (dist. poles, tangent)	52
62	7 (dist. poles)	?	Removal of 7 dist. poles	—
63	3 (dist. poles)	?	Removal of 3 dist. poles	—
67	4 (dist. poles)	?	4 (dist. poles, tangent)	47.5
68	2 (dist. poles, tangent)	?	Removal of 2 dist. poles (tangent)	—
69	2 (dist. poles, tangent)	?	3 (dist. poles, tangent)	61
74	2 (dist. poles, tangent)	?	2 (dist. poles, tangent)	61

SDG&E Response:

Approximate heights of existing poles are provided in Table 10: Approximate Height of Existing Pole Structures Depicted in the KVPs. Specific existing and Proposed Projects' pole heights have been previously provided in the GIS dataset.

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Table 10: Approximate Height of Existing Pole Structures Depicted in the KVPs

KVP	# Existing Pole Structures (tangent/ angle)	Approx. Height (feet)	# Proposed Pole Structures (tangent/ angle)	Max. Height (feet)
3	5 (H-frame)	72.7	5 (angle)	120
7	5 (tangent)	47.5	5 (tangent)	120
10	3 (H-frame)	58.8	3 (angle)	120
14	4 (tangent)	59.8	4 (angle)	120
17	5 (tangent)	76.1	5 (tangent)	100
19	3 (tangent)	48.6	3 (tangent)	100
21	10 (tangent)	54.9	10 (tangent)	100
27	3 (1 tangent, 2 angle)	61.0	3 (1 tangent, 2 angle)	110
28	3 (2 tangent, 1 angle)	52.9	4 (3 tangent, 1 angle)	110
33	TL 629 (3 tangent, 1 angle)	57.9	TL 629 (4 angle poles, 2 tangent)	110
	C449 (3 distribution poles, 1 H-frame pole)	29.3	C449 (2 tangent distribution poles)	52
37	1 (H-frame)	42.5	1 (tangent)	110
42	7 (5 tangent, 2 distribution poles)	47.8	7 (5 tangent, 2 distribution poles)	110 (tangent poles) 38.5 (distribution poles)
43	3 (2 tangent, 1 angle)	57.4	3 (2 tangent, 1 angle)	110
48	3 (tangent)	49.8	3 (tangent)	110
55	3 (tangent)	53.4	3 (1 tangent, 2 angle)	100
59	1 (distribution Pole)	39.5	Removal of 1 distribution pole	–
60	5 (distribution poles, tangent)	41	5 (distribution poles, tangent)	52
62	7 (distribution poles)	34.2	Removal of 7 distribution poles	–
63	3 (distribution poles)	28.0	Removal of 3 distribution poles	–
67	4 (distribution poles)	30.6	4 (distribution poles, tangent)	47.5

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KVP	# Existing Pole Structures (tangent/ angle)	Approx. Height (feet)	# Proposed Pole Structures (tangent/ angle)	Max. Height (feet)
68	2 (distribution poles, tangent)	41.5	Removal of 2 distribution poles (tangent)	–
69	2 (distribution poles, tangent)	40.0	3 (distribution poles, tangent)	61
74	2 (distribution poles, tangent)	42.5	2 (distribution poles, tangent)	61
79	3 (distribution poles, tangent)	29.7	Removal of 3 distribution poles	–

Attachment A: Electronic File Directory

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Document Name	Data Request Question #	File Name	File Path
Service List and Public Review Locations for Notice of Applications	Administrative Question #1	CNF PTC Application Appendix C Service List (10-17-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Administrative
CNF Land Owner Notifications	Administrative Question #1	CNF Land Owner Notifications (10-12-12S).xls	CPUC Data Request 1 Responses\Electronic Files\Administrative
Biological Technical Report for the San Diego Gas & Electric Company Electric Safety and Reliability Plan Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #6 Biological Resources Question #14	CNF Biological Technical Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\BTR
Rare Plant Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project in the Cleveland National Forest and Surrounding Areas, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF Rare Plant Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Arroyo Toad (<i>Anaxyrus californicus</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF ARTO Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Coastal California Gnatcatcher (<i>Poliophtila calioformica californica</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11 Biological Resources Question #14	CNF CAGN Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Hermes Copper Butterfly (<i>Hermelycaena [lycaena] hermes</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11 Biological Resources Question #14	CNF Hermes Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Least Bell's Vireo (<i>Vireo bellii pusillus</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF LBVI Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Quino Checkerspot Butterfly (<i>Euphydryas editha quino</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF QCB Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Stephens' Kangaroo Rat (<i>Dipodomys stephensi</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1	CNF SKR Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports

Document Name	Data Request Question #	File Name	File Path
California Spotted Owl (<i>Strix occidentalis occidentalis</i>) Habitat Assessment and Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF SPOW Habitat Assessment and Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Southern Willow Flycatcher (<i>Empidonax traillii extimus</i>) Focused Survey Report for the San Diego Gas & Electric Cleveland National Forest Master Services Permit Project, San Diego County, California	General Comments Question #2 Biological Resources Question #1 Biological Resources Question #11	CNF SWFL Focused Survey Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Biological\Focused Survey Reports
Inventory, Evaluation, and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project - Confidential	General Comments Question #2 Cultural Resources Question #1	CNF Cultural Resources Technical Report - Confidential (10-12-12S).pdf Appendix A Key Personnel Resumes – Confidential (10-12-12S).pdf Appendix B Record Search Updates - Confidential (10-12-12S).pdf Appendix C NAHC Correspondence – Confidential (10-12-12S).pdf Appendix D Survey Corridor Studies - Confidential (10-12-12S).pdf	CONFIDENTIAL\CPUC Data Request 1 Responses\CNF Cultural Resources Technical Report - Confidential
Cleveland National Forest Electric Safety and Reliability Project Technical Noise Study Report	General Comments Question #2 Noise Question #1 Noise Question #2 Noise Question #4 Noise Question #5 Noise Question #6 Noise Question #7 Noise Question #8 Noise Question #11	CNF Noise Technical Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Noise
Report on ASTM Phase I Environmental Site Assessment, Cleveland National Forest Electric Safety and Reliability Project, San Diego County, California	General Comments Question #2	CNF Phase I Environmental Site Assessment (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Phase I
Visual Resources Technical Study, Cleveland National Forest Electric Safety and Reliability Project	General Comments Question #2 Visual Resources Question #2 Attachment F Question #3	CNF Visual Resources Technical Report (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Technical Reports\Visual
CNF Existing Conditions	General Comments Question #3 General Comments Question #4 General Comments Question #5 Air Quality Question #1 Biological Resources Question #1 Noise Question #3 Noise Question #5	CNF Existing Conditions (12-03-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\General Comments\Existing Conditions
Management Indicator Species Assessment for the Sunrise Powerlink Project in the Cleveland National Forest	Biological Resources Question #11	Sunrise USFS MIS Assessment (12-03-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Biological Resources
CNF Noise Impacted Residential Parcels	Noise Question #12	CNF Noise Impacted Residential Parcels (12-03-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Noise
CNF Noise Impacted Residences	Noise Question #12	CNF Noise Impacted Residences (12-03-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Noise

Document Name	Data Request Question #	File Name	File Path
CNF Distances from KVPs to Proposed Projects Poles	Attachment F Question #2 Attachment F Question #5 Attachment F Question #6 Attachment F Question #7 Attachment F Question #8	CNF Distances from KVPs to Poles (12-03-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Attachment F\CNF Distances from KVPs to Poles
Existing View and Visual Simulation Photographs	Attachment F Question #9	CNF TL625 KVP 3 Existing View (10-12-12S).jpg CNF TL625 KVP 3 Existing View (10-12-12S).pdf CNF TL625 KVP 3 Visual Simulation (10-12-12S).jpg CNF TL625 KVP 3 Visual Simulation (10-12-12S).pdf CNF TL625 KVP 7 Existing View (10-12-12S).jpg CNF TL625 KVP 7 Existing View (10-12-12S).pdf CNF TL625 KVP 7 Visual Simulation (10-12-12S).jpg CNF TL625 KVP 7 Visual Simulation (10-12-12S).pdf CNF TL625 KVP 10 Existing View (10-12-12S).jpg CNF TL625 KVP 10 Existing View (10-12-12S).pdf CNF TL625 KVP 10 Visual Simulation (10-12-12S).jpg CNF TL625 KVP 10 Visual Simulation (10-12-12S).pdf CNF TL625 KVP 14 Existing View (10-12-12S).jpg CNF TL625 KVP 14 Existing View (10-12-12S).pdf CNF TL625 KVP 14 Visual Simulation (10-12-12S).jpg CNF TL625 KVP 14 Visual Simulation (10-12-12S).pdf CNF TL626 KVP 17 Existing View (10-12-12S).jpg CNF TL626 KVP 17 Existing View (10-12-12S).pdf CNF TL626 KVP 17 Visual Simulation (10-12-12S).jpg CNF TL626 KVP 17 Visual Simulation (10-12-12S).pdf CNF TL626 KVP 19 Existing View (10-12-12S).jpg CNF TL626 KVP 19 Existing View (10-12-12S).pdf CNF TL626 KVP 19 Visual Simulation (10-12-12S).jpg CNF TL626 KVP 19 Visual Simulation (10-12-12S).pdf CNF TL626 KVP 21 Existing View (10-12-12S).jpg CNF TL626 KVP 21 Existing View (10-12-12S).pdf CNF TL626 KVP 21 Visual Simulation (10-12-12S).jpg CNF TL626 KVP 21 Visual Simulation (10-12-12S).pdf CNF TL629 KVP 27 Existing View (10-12-12S).jpg CNF TL629 KVP 27 Existing View (10-12-12S).pdf CNF TL629 KVP 27 Visual Simulation (10-12-12S).jpg CNF TL629 KVP 27 Visual Simulation (10-12-12S).pdf	CPUC Data Request 1 Responses\Electronic Files\Attachment F\Existing View and Visual Simulation Photographs

Document Name	Data Request Question #	File Name	File Path
		CNF TL629 KVP 28 Existing View (10-12-12S).jpg CNF TL629 KVP 28 Existing View (10-12-12S).pdf CNF TL629 KVP 28 Visual Simulation (10-12-12S).jpg CNF TL629 KVP 28 Visual Simulation (10-12-12S).pdf CNF TL629 and C449 KVP 33 Existing View (10-12-12S).jpg CNF TL629 and C449 KVP 33 Existing View (10-12-12S).pdf CNF TL629 and C449 KVP 33 Visual Simulation (10-12-12S).jpg CNF TL629 and C449 KVP 33 Visual Simulation (10-12-12S).pdf CNF TL629 KVP 37 Existing View (10-12-12S).jpg CNF TL629 KVP 37 Existing View (10-12-12S).pdf CNF TL629 KVP 37 Visual Simulation (10-12-12S).jpg CNF TL629 KVP 37 Visual Simulation (10-12-12S).pdf CNF TL682 KVP 42 Existing View (10-12-12S).jpg CNF TL682 KVP 42 Existing View (10-12-12S).pdf CNF TL682 KVP 42 Visual Simulation (10-12-12S).jpg CNF TL682 KVP 42 Visual Simulation (10-12-12S).pdf CNF TL682 KVP 43 Existing View (10-12-12S).jpg CNF TL682 KVP 43 Existing View (10-12-12S).pdf CNF TL682 KVP 43 Visual Simulation (10-12-12S).jpg CNF TL682 KVP 43 Visual Simulation (10-12-12S).pdf CNF TL682 KVP 48 Existing View (10-12-12S).jpg CNF TL682 KVP 48 Existing View (10-12-12S).pdf CNF TL682 KVP 48 Visual Simulation (10-12-12S).jpg CNF TL682 KVP 48 Visual Simulation (10-12-12S).pdf CNF TL6923 KVP 55 Existing View (10-12-12S).jpg CNF TL6923 KVP 55 Existing View (10-12-12S).pdf CNF TL6923 KVP 55 Visual Simulation (10-12-12S).jpg CNF TL6923 KVP 55 Visual Simulation (10-12-12S).pdf CNF C78 KVP 59 Existing View (10-12-12S).jpg CNF C78 KVP 59 Existing View (10-12-12S).pdf CNF C78 KVP 59 Visual Simulation (10-12-12S).jpg CNF C78 KVP 59 Visual Simulation (10-12-12S).pdf CNF C78 KVP 60 Existing View (10-12-12S).jpg CNF C78 KVP 60 Existing View (10-12-12S).pdf CNF C78 KVP 60 Visual Simulation (10-12-12S).jpg CNF C78 KVP 60 Visual Simulation (10-12-12S).pdf CNF C79 KVP 62 Existing View (10-12-12S).jpg	

Document Name	Data Request Question #	File Name	File Path
		CNF C79 KVP 62 Existing View (10-12-12S).pdf CNF C79 KVP 62 Visual Simulation (10-12-12S).jpg CNF C79 KVP 62 Visual Simulation (10-12-12S).pdf CNF C79 KVP 63 Existing View (10-12-12S).jpg CNF C79 KVP 63 Existing View (10-12-12S).pdf CNF C79 KVP 63 Visual Simulation (10-12-12S).jpg CNF C79 KVP 63 Visual Simulation (10-12-12S).pdf CNF C157 KVP 67 Existing View (10-12-12S).jpg CNF C157 KVP 67 Existing View (10-12-12S).pdf CNF C157 KVP 67 Visual Simulation (10-12-12S).jpg CNF C157 KVP 67 Visual Simulation (10-12-12S).pdf CNF C440 KVP 68 Existing View (10-12-12S).jpg CNF C440 KVP 68 Existing View (10-12-12S).pdf CNF C440 KVP 68 Visual Simulation (10-12-12S).jpg CNF C440 KVP 68 Visual Simulation (10-12-12S).pdf CNF C440 KVP 69 Existing View (10-12-12S).jpg CNF C440 KVP 69 Existing View (10-12-12S).pdf CNF C440 KVP 69 Visual Simulation (10-12-12S).jpg CNF C440 KVP 69 Visual Simulation (10-12-12S).pdf CNF C442 KVP 74 Existing View (10-12-12S).jpg CNF C442 KVP 74 Existing View (10-12-12S).pdf CNF C442 KVP 74 Visual Simulation (10-12-12S).jpg CNF C442 KVP 74 Visual Simulation (10-12-12S).pdf CNF C449 KVP 79 Existing View (10-12-12S).jpg CNF C449 KVP 79 Existing View (10-12-12S).pdf CNF C449 KVP 79 Visual Simulation (10-12-12S).jpg CNF C449 KVP 79 Visual Simulation (10-12-12S).pdf	

Attachment B: GIS Data File Directory

CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS SAN DIEGO GAS & ELECTRIC COMPANY (SDG&E) Geographic Information System (GIS) Data Transfer

December 3, 2012

Introduction

The following document describes the GIS data created or used by Insignia Environmental (Insignia) when preparing the Preliminary Plan of Development and supplementary information for the Proposed Projects. Table 1: GIS Data File Directory includes the name, description, data type, source, and file path for each GIS file being transmitted. Notation has also been provided to indicate the applicable California Public Utilities Commission Data Request #1 question to which each shapefile applies.

File Name Abbreviations

The following list of abbreviations was used during the naming of the GIS files:

- ARTO: Arroyo toad
- CA: California
- CAGN: California gnatcatcher
- CNDDDB: California Natural Diversity Database
- CSOW: California spotted-owl
- LBVI: Least Bell's vireo
- QCB: Quino Checkerspot Butterfly
- SWFL: Southwestern flycatcher

Coordinate System

All shapefiles are provided in the NAD_1983_StatePlane_California_VI_FIPS_0404_Feet coordinate system, in Feet_US units.

Table 1: GIS Data File Directory

Feature Class	Description	Geometry Type	Source	File Path	Data Request Section/Question Number					
					GIS Data Requests #1	General Comments #2	Biological Resources #1	Biological Resources #6	Visual Resources #1	Attachment F #1
CNF_Exclusive_Access_Roads.shp	Access roads under the CNF MSUP	Polyline	SDG&E, 2012; Insignia, 2012	CPUC Data Request 1 Responses\GIS Data.zip	✓	✓				
CNF_KVP_Locations.shp	Key viewpoint locations	Point	Environmental Vision, 2012	CPUC Data Request 1 Responses\GIS Data.zip		✓				✓
CNF KVP Locations.kmz	Key viewpoint locations	Point	Environmental Vision, 2012	CPUC Data Request 1 Responses\GIS Data.zip		✓				✓
USFS_Scenic_Integrity.shp	Scenic integrity levels	Polygon	United States (U.S.) Forest Service (USFS), 2006	CPUC Data Request 1 Responses\GIS Data.zip		✓			✓	
CDF_Land_Cover.shp	Land cover	Polygon	California Land Cover Mapping & Monitoring Program, California Department of Forestry and Fire Protection & USFS, 2005	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles		✓	✓			
CNDDDB_County_Clip.shp	CNDDDB clipped to the San Diego County boundary	Polygon	California Department of Fish and Game, 2012	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles		✓	✓			
Critical_Habitat_within_Vicinity.shp	Critical habitat species within the vicinity of the Power Line Replacement Projects	Polygon	U.S Fish and Wildlife Service (USFWS), 2012	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles		✓	✓			
Vegetation_Survey.shp	Vegetation survey data	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles		✓	✓	✓		
ARTO_Survey_Results.shp	Arroyo toad survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			

Feature Class	Description	Geometry Type	Source	File Path	Data Request Section/Question Number					
					GIS Data Requests #1	General Comments #2	Biological Resources #1	Biological Resources #6	Visual Resources #1	Attachment F #1
CAGN_Survey_Results.shp	California gnatcatcher survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
CSOW_Survey_Sites_Results.shp	California spotted-owl survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
Hermes_Buffered_Results.shp	Hermes copper butterfly survey results plus buffer approximating species coverage	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
Hermes_Locations_Results.shp	Hermes copper butterfly survey results	Point	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
LBVI_Survey_Results.shp	Least Bell's vireo survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
QCB_Observed.shp	Observed Quino checkerspot butterfly locations	Point	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
QCB_Plant_Survey_Results.shp	Quino checkerspot butterfly plant survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
Rare_Plant_Survey_Results.shp	Rare plant survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			

Feature Class	Description	Geometry Type	Source	File Path	Data Request Section/Question Number					
					GIS Data Requests #1	General Comments #2	Biological Resources #1	Biological Resources #6	Visual Resources #1	Attachment F #1
SWFL_Survey_Results.shp	Southwestern willow flycatcher survey results	Polygon	Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Species Survey Results		✓	✓			
Arroyo_Toad.shp	Modeled suitable and occupied habitat for arroyo toad	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
CA_Gnatcatcher.shp	Modeled suitable and occupied habitat for California gnatcatcher	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
CA_Red_Legged_Frog.shp	Modeled suitable and occupied habitat for California red-legged frog	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
Laguna_Moutains_Skipper.shp	Modeled suitable and occupied habitat for Laguna Mountains skipper habitat	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
Least_Bells_Vireo.shp	Modeled suitable and occupied habitat for Least Bell's vireo	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
QCB_Not_Suitable.shp	Not suitable habitat for Quino checkerspot butterfly	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
QCB_USFWS_Occupied_Habitat.shp	Quino checkerspot butterfly occupied habitat	Polygon	USFWS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			

Feature Class	Description	Geometry Type	Source	File Path	Data Request Section/Question Number					
					GIS Data Requests #1	General Comments #2	Biological Resources #1	Biological Resources #6	Visual Resources #1	Attachment F #1
San_Bernardino_Bluegrass.shp	Modeled suitable and occupied habitat for San Bernardino bluegrass	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
San_Diego_Thornmint.shp	Modeled suitable and occupied habitat for San Diego thornmint	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
Stephens_Kangaroo_Rat.shp	Modeled suitable and occupied habitat for Stephen's kangaroo rat	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			
Willow_Flycatcher_Suitable.shp	Modeled suitable and occupied habitat for southwestern willow flycatcher	Polygon	USFS; Chambers Group Inc., 2010	CPUC Data Request 1 Responses\GIS Data.zip\Biological Resource Shapefiles\Suitable and Occupied Habitat		✓	✓			

Attachment C: Map File Directory

Attachment C: Map File Directory

Map Name	Data Request Question #	File Name	File Path
USFWS-Designated Critical Habitat and USFS-Designated Occupied Habitat Maps	Biological Resources Question #6 Biological Resources Question #14	CNF Critical Habitat Map and Occupied Habitat Map (10-12-12S).pdf CNF TL625 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF TL626 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF TL629 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF TL682 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF TL6923 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C78 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C79 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C157 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C440 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C442 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf CNF C449 Critical Habitat and Occupied Habitat Map (10-12-12S).pdf	CPUC Data Request 1 Responses\Maps\Biological Resources
CNF Scenic Integrity	Visual Resources Question #1	CNF Scenic Integrity (12-03-12S).pdf	CPUC Data Request 1 Responses\Maps\Visual Resources
CNF Attachment F Visual Sims TL6923	Attachment F Question #3	CNF Attachment F Visual Sims TL6923 (10-12-12S).pdf	CPUC Data Request 1 Responses\Maps\Visual Resources
CNF Attachment F Visual Sims TL625	Attachment F Question #4	CNF Attachment F Visual Sims TL625 (10-12-12S).pdf	CPUC Data Request 1 Responses\Maps\Visual Resources

