



Rebecca W. Giles
Regulatory Case Manager
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May 15, 2015

Reg.12-10/A.12-10-009
SDG&E CNF PTC Application

Sent Via Electronic Mail

Lisa Orsaba California Public Utilities Commission Energy Division 505 Van Ness Avenue San Francisco, CA 94102	Rica Nitka Dudek 605 Third Street Encinitas, CA 92024
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Subject: CNF ED11-SDGE Response – Questions 1-6.

Dear Ms. Orsaba and Ms. Nitka:

Attached please find SDG&E's response to Energy Division's (ED) Data Request 11 issued on May 8, 2015. This submittal includes responses to questions 1 through 6 and completes the utility's response to this request.

If you have any questions, please contact me either by phone: (858) 636-6876 or email: RGiles@semprautilities.com.

Sincerely,

Signed

Rebecca W. Giles
Regulatory Case Manager

Enclosures

cc: Allen Trial – SDG&E
Elizabeth Cason – SDG&E
Tim Knowd – SDG&E
Central Files - SDG&E
Fred Bauermeister – Insignia
John Porteous – Dudek
Bob Hawkins – US Forest Service
Jeff Heys – Cleveland National Forest, USFS
Kelli Taylor - Cleveland National Forest, USFS

ED11-SDGE 05/15/2015 Response
A.12-10-009 Cleveland National Forest (CNF) Power Line Replacement Projects PTC
ED Data Request 11 Dated May 8, 2015
ED11-SDGE: Question 1-6

1. Project Description	Q1-2	Ref: ED10 Q1 Exh A
2. Biological Resources	Q3-5	Ref ED10 Q3 Exh B
3. Natural Community Conservation Plan (NCCP)	Q6	

Question 1:

Please indicate how many weathered steel poles are associated with C78 (Table B-2).

Response to Q1:

As provided in SDG&E's response to ED Data Request 10, 44 weathered steel poles will be constructed along the Proposed Projects' segment of C78.

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Question 2:

Please clarify the following discrepancies in Table B-7 with the GIS data provided with DR10. If changes to Table B-7 are necessary, please provide a corrected version of Exhibit A Table B-7 (please only show changes between Draft EIR/EIS text and new text in final table submitted).

- TL682
 - Guard structures, GIS indicates 4 within the Cleveland National Forest (CNF) (table indicates 14).
- TL626
 - “Fly yard” text is deleted under “Work Area Type” column; however, data inserted shows one site within CNF. Based on GIS data provided, this site is located outside CNF. This fly yard is located east of Pole Z372116.
- TL629
 - Removal, GIS data includes two removal areas that occur outside of CNF (table indicates six).
- TL6923
 - GIS doesn’t contain data for removal areas for this line (table indicates four).

Response to Q2:

SDG&E has included an updated Table B-7: Temporary Work Area Summary below, with clarifications between the Draft EIR/EIS and the final GIS data shown in **bold**.

- TL682: This power line includes 4 guard structures within the CNF boundary and 56 outside the CNF, for a total of 60. This change has been included in Table B-7 below.
- TL626: The fly yard located east of pole Z372116 is located outside the CNF boundary but, due to minor inconsistencies in GIS layer mapping, a very minor portion of the fly yard polygon overlaps with the CNF boundary. SDG&E has updated Table B-7 to reflect that this fly yard is outside the CNF. The text for this entry was inadvertently deleted, but has been added to Table B-7 below.
- TL629: The GIS data includes six Removal areas for this line, consistent with what was provided in SDG&E’s response to ED Data Request 10. The corresponding information for these areas can be found in the Action column of the GIS database.
- TL6923: The GIS data includes four Removal areas for this line, consistent with what was provided in SDG&E’s response to ED Data Request 10. The corresponding information for these areas can be found in the Action column of the GIS database.

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Table B-7
Temporary Work Area Summary

Work Area Type		Approximate Quantity			Required Improvements	Approximate Dimensions (Feet)	Total Approximate Area (Acres)		
		With in CNF	Outside CNF	Total			With in CNF	Outside CNF	Total
<i>69 kV Power Line</i>									
TL682	Direct-Bury Steel Pole Work Area	20	166	186	Vegetation removal and minor grading may be required.	40-foot diameter	0.6	4.8	5.4
	Self-Supported Steel Pole Work Area	7	60	67	Vegetation removal and minor grading may be required.	40-foot diameter	0.2	1.7	1.9
	Staging Area	0	3	3	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.0	4.1	4.1
	Stringing Site	2	31	33	Vegetation clearing may be required.	Varies	0.2	5.2	5.4
	Fly Yard	0	2	2	Vegetation clearing may be required.	Varies	0	4.9	4.9
	Guard Structure	44	56	70	Vegetation clearing may be required.	3-foot diameter	<0.1	<0.1	<0.1
TL626	Direct-Bury Steel Pole Work Area	93	114	207	Vegetation removal and minor grading may be required.	40-foot diameter	2.7	3.3	6.0
	Self-Supported Steel Pole Work Area	27	45	72	Vegetation removal and minor grading may be required.	40-foot diameter	0.8	1.3	2.1
	Wood Pole Removal Area	0	1	1	Vegetation removal and minor grading may be required.	40-foot diameter	0.0	<0.1	<0.1
	Staging Area	0	4	4	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.0	5.6	5.6
	Stringing Site	7	18	25	Vegetation clearing may be required.	Varies	0.6	2.2	2.8
	Fly Yard	1	1	1	Vegetation clearing may be required.	Varies	0.5	0.5	0.5
TL625	Direct-Bury Steel Pole Work Area	54	124	178	Vegetation removal and minor grading may be required.	40-foot diameter	1.6	3.6	5.2
	Self-Supported Steel Pole Work Area	27	72	99	Vegetation removal and minor grading may be required.	40-foot diameter	0.8	2.1	2.9

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Work Area Type		Approximate Quantity			Required Improvements	Approximate Dimensions (Feet)	Total Approximate Area (Acres)		
		With in CNF	Outside CNF	Total			With in CNF	Outside CNF	Total
	Wood Pole Removal Area	7	10	17	Vegetation removal and minor grading may be required.	40-foot diameter	0.2	0.3	0.5
	Staging Area	0	11	11	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.0	10.0	10.0
	Stringing Site	7	30	37	Vegetation clearing may be required.	Varies	0.5	5.4	5.9
	Fly Yard	1	4	5	Vegetation clearing may be required.	Varies	0.3	7.4	7.7
	Guard Structure	14	62	76	Vegetation clearing may be required.	3-foot diameter	<0.1	<0.1	<0.1
TL629	Direct-Bury Pole Work Area	91	192	283	Vegetation removal and minor grading may be required.	40-foot diameter	2.6	5.5	8.1
	Self-Supported Pole Work Area	53	119	172	Vegetation removal and minor grading may be required.	40-foot diameter	1.5	3.4	4.9
	Wood Pole Removal Area	6	15	21	Vegetation removal and minor grading may be required.	40-foot diameter	0.2	0.4	0.6
	Staging Area	0	5	5	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.0	9.5	9.5
	Stringing Site	13	69	82	Vegetation clearing may be required.	Varies	2.1	13.1	15.2
	Fly Yard	0	3	3	Vegetation clearing may be required.	Varies	0.0	1.2	1.2
	Guard Structure	16	13	29	Vegetation clearing may be required.	3-foot diameter	<0.1	<0.1	<0.1
TL6923	Direct-Bury Steel Pole Work Area	22	54	76	Vegetation removal and minor grading may be required.	40-foot diameter	0.6	1.5	2.1
	Self-Supported Steel Pole Work Area	14	40	54	Vegetation removal and minor grading may be required.	40-foot diameter	0.4	1.2	1.6
	Wood Pole Removal Area	0	4	4	Vegetation removal may be required.	40-foot diameter	0	0.1	0.1

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Table B-7
Temporary Work Area Summary

Work Area Type		Approximate Quantity			Required Improvements	Approximate Dimensions (Feet)	Total Approximate Area (Acres)		
		<i>With in CNF</i>	<i>Outsi de CNF</i>	<i>Tot al</i>			<i>With in CNF</i>	<i>Outsi de CNF</i>	<i>Total</i>
	Staging Area	0	3	3	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0	22.5	22.5
	Stringing Site	5	21	26	Vegetation clearing may be required.	Varies	0.5	2.1	2.6
	Guard Structure	0	4	4	Vegetation clearing may be required.	3-foot diameter	0.0	<0.1	<0.1

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Table B-7
Temporary Work Area Summary

Work Area Type		Approximate Quantity			Required Improvements	Approximate Dimensions (Feet)	Total Approximate Area (Acres)		
		With in CNF	Outsi de CNF	Tot al			With in CNF	Outsi de CNF	Total
<i>12 kV Distribution Line</i>									
C79	Wood Pole Removal Area	47	17	64	Vegetation removal and minor grading may be required.	20-foot diameter	0.3	0.1	0.4
	Staging Area	1	6	7	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.3	0.2	0.5
	Fly Yard	1	0	1	Vegetation clearing may be required.	Varies	<0.1	0.0	<0.1
	Stringing Site	2	23	25	Vegetation clearing may be required.	Varies	<0.1	0.2	0.3
	Underground Duct Bank	0	1	1	Vegetation removal and minor grading may be required.	<12-foot width	0	4.1	4.1
C78	Direct-Bury Steel Pole Work Area	33	11	44	Vegetation removal and minor grading may be required.	20-foot diameter	0.2	0.1	0.3
	Wood Pole Removal Area	21	0	21	Vegetation removal and minor grading may be required.	20-foot diameter	0.2	0.0	0.2
	Stringing Site	1	3	4	Vegetation clearing may be required.	Varies	0.0	0.1	0.1
C157	Direct-Bury Steel Pole Work Area	28	29	57	Vegetation removal and minor grading may be required.	20-foot diameter	0.2	0.2	0.4
	Staging Area	1	1	2	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.1	0.2	0.3
	Stringing Site	1	2	3	Vegetation clearing may be required.	Varies	<0.1	0.1	0.2
C442	Direct-Bury Steel Pole Work Area	82	47	129	Vegetation removal and minor grading may be required.	20-foot diameter	0.6	0.3	0.9
	Staging Area	1	1	2	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	<0.1	0.3	0.4
	Fly Yard	3	0	3	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.1	0	0.1

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Temporary Work Area Summary

Work Area Type		Approximate Quantity			Required Improvements	Approximate Dimensions (Feet)	Total Approximate Area (Acres)		
		With in CNF	Outside CNF	Total			With in CNF	Outside CNF	Total
	Stringing Site	6	4	10	Vegetation clearing may be required.	Varies	0.1	0.1	0.2
C440	Direct-Bury Steel Pole Work Area	324	116	440	Vegetation removal and minor grading may be required.	20-foot diameter	2.3	0.8	3.1
	Wood Pole Removal Area	82	17	99	Vegetation removal and minor grading may be required.	20-foot diameter	0.6	0.1	0.7
	Staging Area	10	0	10	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.8	0.0	0.8
	Stringing Site	107	13	120	Vegetation clearing may be required.	Varies	1.7	0.3	2.0
	Underground Duct Bank	3	1	4	Vegetation removal and minor grading may be required.	<12-foot width	10.9	1.3	12.2
C449	Direct-Bury Steel Pole Work Area	29	12	41	Vegetation removal and minor grading may be required.	20-foot diameter	0.2	0.1	0.3
	Wood Pole Removal Area	83	14	97	Vegetation removal and minor grading may be required.	20-foot diameter	0.6	0.1	0.7
	Staging Area	0	1	1	Vegetation removal, minor grading, and gravel laydown may be required.	Varies	0.0	0.2	0.2
	Stringing Site	23	7	30	Vegetation clearing may be required.	Varies	0.6	0	0.6
	Underground Duct Bank	1	1	2	Vegetation removal and minor grading may be required.	<12-foot width	2.2	0.4	2.6

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Question 3:

Tables D.4-5 and D.4-6 (Exhibit B in DR10) provide temporary and permanent impact acreages to vegetation communities and land cover types. Under land cover types, GIS vegetation data is separated into three categories: disturbed (ruderal/barren), pastureland/cultivated agriculture, and urban and developed/ornamental landscaping. During consultation meetings in early 2015 with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service (the Wildlife Agencies), the Wildlife Agencies expressed concern that areas designated as ruderal or pastureland may include suitable habitat for special-status species. Therefore, please provide clarification and detailed information on how many acres of the “disturbed (ruderal/barren)” and “pastureland/cultivated agriculture” categories are considered habitat by the Wildlife Agencies, which would consequently count as “take” under SDG&E’s Subregional NCCP. If impacted acreage differs (i.e., some is considered habitat and some is not) in these two categories from the information submitted on May 1, 2015, please clearly indicate the acreage considered habitat vs. not-habitat in Tables D.4-5 and D.4-6. If Table D.4-5 and Table D.4-6 acres are revised based on Wildlife Agencies’ discussions, please provide an updated GIS vegetation layer clearly showing which areas previously considered disturbed (ruderal/barren) and pastureland/cultivated agriculture are now considered “habitat.”

Response to Q3:

Based on comments that the California Department of Fish and Wildlife (CDFW) provided at the inter-agency meeting on this project on March 10, 2015, and based on follow-up communications between CDFW and SDG&E, SDG&E re-categorized 9.81 acres of Pastureland/Cultivated Agriculture as Non-native Grassland. This acreage amount was reapportioned to the Non-native Grassland categories as shown in Tables D.4-5 and D.4-6 of SDG&E’s response to ED Data Request 10. Footnotes indicating the reapportionment of these acres were provided with those tables as part of SDG&E’s response. As a result, the three Land Cover Type categories in these tables do not include any acreage that are considered habitat by the Wildlife Agencies. The GIS database provided in response to ED Data Request 10 includes identification of the re-categorized areas. Specifically, in the Vegetation feature class, a Note field was added to identify the seven areas identified as “Agriculture functioning as Non-native Grassland.”

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Question 4:

DR10 Q3 requested the following information “...please provide temporary and permanent impacts acreages for the newly proposed work areas shown in Exhibit C by habitat type (i.e., vegetation community, land cover type, *wetland resources*, and *jurisdictional resources*), as well as *biological resources that are known to occur in the newly proposed work areas (i.e., USFWS designated critical habitat and known occurrences of special-status species)*.” SDG&E’s response indicated that information was available in the updated proposed project GIS database. However, the GIS data only provides the vegetation data and no information regarding the items in italics above. Please state whether or not any items in italics above occur on the newly proposed work areas. If yes, please provide specifics and a statement on which databases were reviewed. If not, please provide a statement on which databases were reviewed to determine if the items in italics do not occur in the newly proposed work areas.

Response to Q4:

SDG&E reviewed the U.S. Fish and Wildlife Service’s National Wetlands Inventory Data and Critical Habitat for Threatened and Endangered Species shapefile, as well as the California Natural Diversity Database (CNDDDB), to evaluate the potential presence of hydrologic features or sensitive biological resources at the additional staging areas referenced in ED Data Request 10, Exhibit C. Additionally, SDG&E conducted pedestrian surveys to identify hydrological resources in these areas. One staging area, Kreutzkamp Staging Yard, was determined to have hydrological resources in the vicinity of the staging area. However, the staging area was designed to avoid potential impacts to these features. A shapefile containing the identified hydrological feature is included as part of this response.



CNF_DR11_Wetland_T
L6923.zip

[Zip file includes the GIS shapefiles, which are not posted]

SDG&E’s review of the CNDDDB identified the potential for the following special-status species to occur at the staging areas included in ED Data Request 10, Exhibit C:

- Tulloch Staging Yard (ED Data Request 10 #2) – American badger, coast horned lizard, Dulzura pocket mouse, Orcutt’s brodiaea, prairie falcon
- Boulder Creek Staging Yard (ED Data Request 10 #3) – prairie falcon, prairie wedge grass
- Kreutzkamp Staging Yard (ED Data Request 10 #5) – prairie falcon
- Bartlett/Hauser (ED Data Request 10 #6) – prairie falcon, southern jewelflower

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As described in SDG&E's Revised Plan of Development (April 2013), all work areas associated with temporary or permanent impacts would be surveyed for special-status plant and wildlife species by a qualified biologist prior to the commencement of construction in accordance with SDG&E's NCCP and pre-activity survey report requirements.

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Question 5:

Table D.4-10 (Exhibit B in DR10) shows < 0.01 acre of temporary and/or permanent impact acreages to U.S. Army Corps of Engineers-jurisdictional waters for the following project lines: C78, C157, C442, C440, and C449. Please clarify where these impacts to ephemeral drainages occur along these lines. Please include the pole numbers where impacts occur.

Response to Q5:

The GIS database provided as part of SDG&E’s response to ED Data Request 10 includes all necessary data where work areas may have temporary or permanent impacts to jurisdictional waters for the five 12 kV distribution lines. Many of these areas are the result of very minor GIS layer overlapping; some locations have small drainages located alongside or to one side of the pole work area polygon. As described in SDG&E’s Revised POD, these work areas will be delineated prior to construction to avoid such impacts to the extent possible. The following table provides the identified permanent and temporary impacts to these features by distribution line and pole number, as well as the amount of impact to the hundred-thousandths of an acre. Also attached is a mapset showing the location of these identified features, the pole work area polygon, and associated pole and distribution circuit number.



SDGE ED DR11
 Response Q5 Maps ((*[Q5 Maps attached]*)

	Permanent Impact (acres)	Temporary Impact (Acres)	Total (Acres)
C78			
P166377		0.00021	0.00021
C440			
P40126		0.00021	0.00021
P40127		0.00045	0.00045
P40128		0.00002	0.00002
P40136		0.00040	0.00040
P40199		0.00038	0.00038
P40452	0.00004	0.00052	0.00056
P45116		0.00025	0.00025
C442			
P178030		0.00003	0.00003
P178039		0.00018	0.00018

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P178044		0.00036	0.00036
C449			
NEW POLE P-37		0.00006	0.00006
P104078		0.00023	0.00023
P42798		0.00021	0.00021
P46464		0.00045	0.00045

Question 6:

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

Response to Q6:

SDG&E has requested concurrence from the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife on the total acreage available for impacts under the NCCP. As soon as SDG&E receives the concurrence, SDG&E will provide a response to this question.

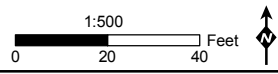
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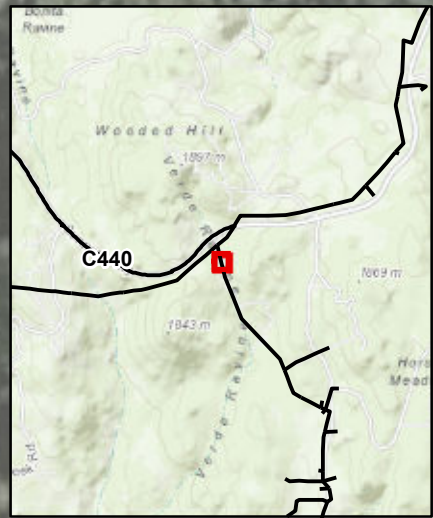
C78 - P166377

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water



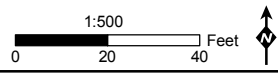
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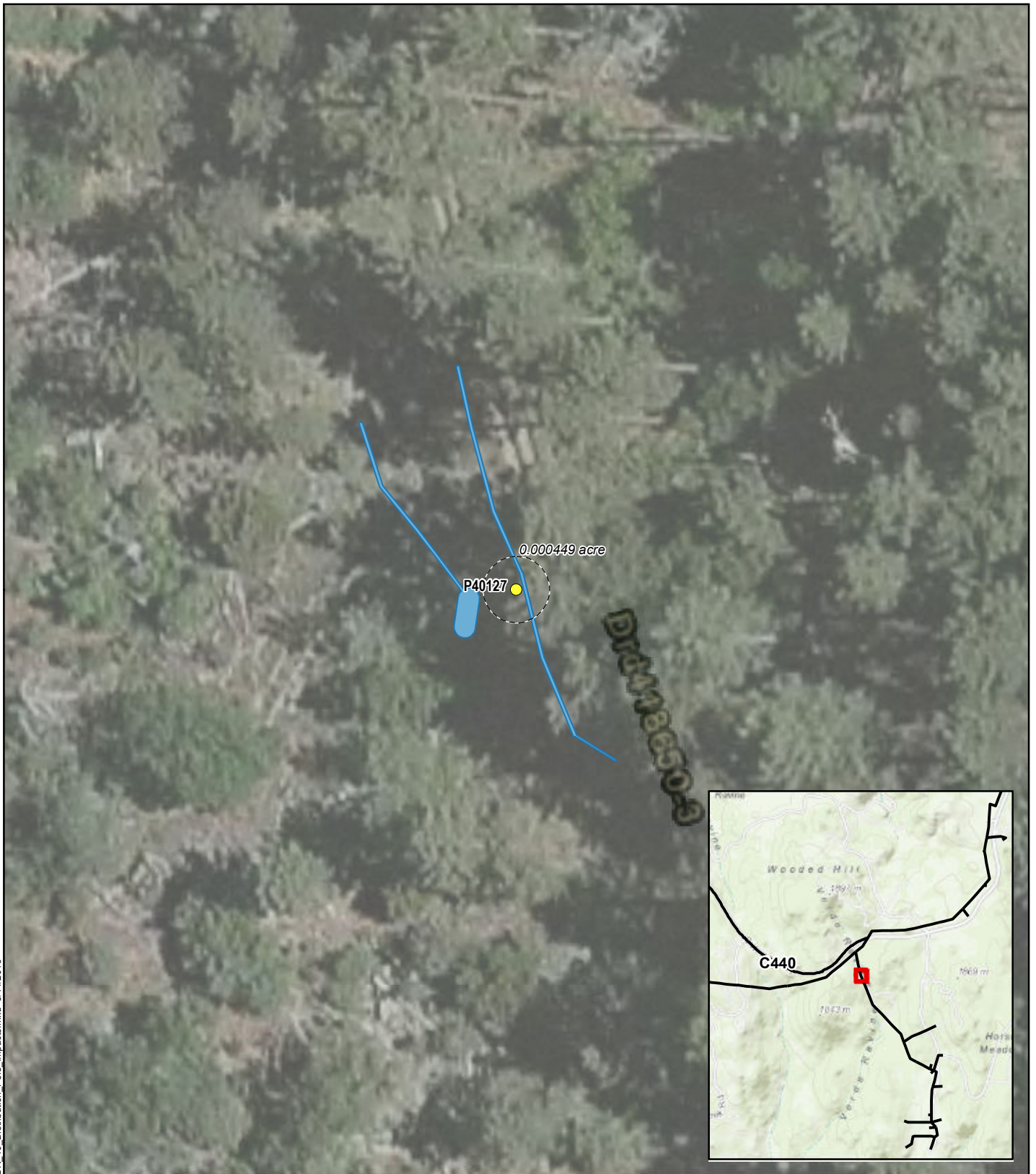


C440 - P40126

CNF Power Line Replacement Projects




- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

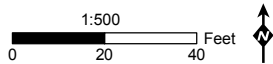


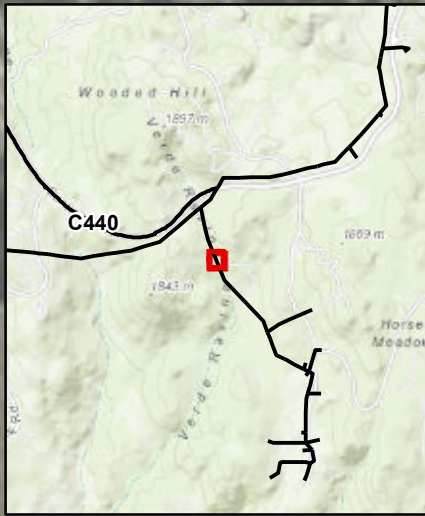


C440 - P40127

CNF Power Line Replacement Projects




-  Pole Location
-  Pole Work Area
-  USACE Jurisdictional Water

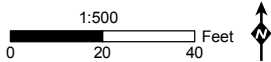




C440 - P40128

CNF Power Line Replacement Projects

-  Pole Location
-  Pole Work Area
-  USACE Jurisdictional Water

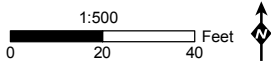




C440 - P40136

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water



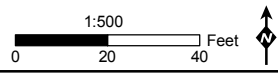
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C440 - P40199

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water



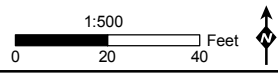
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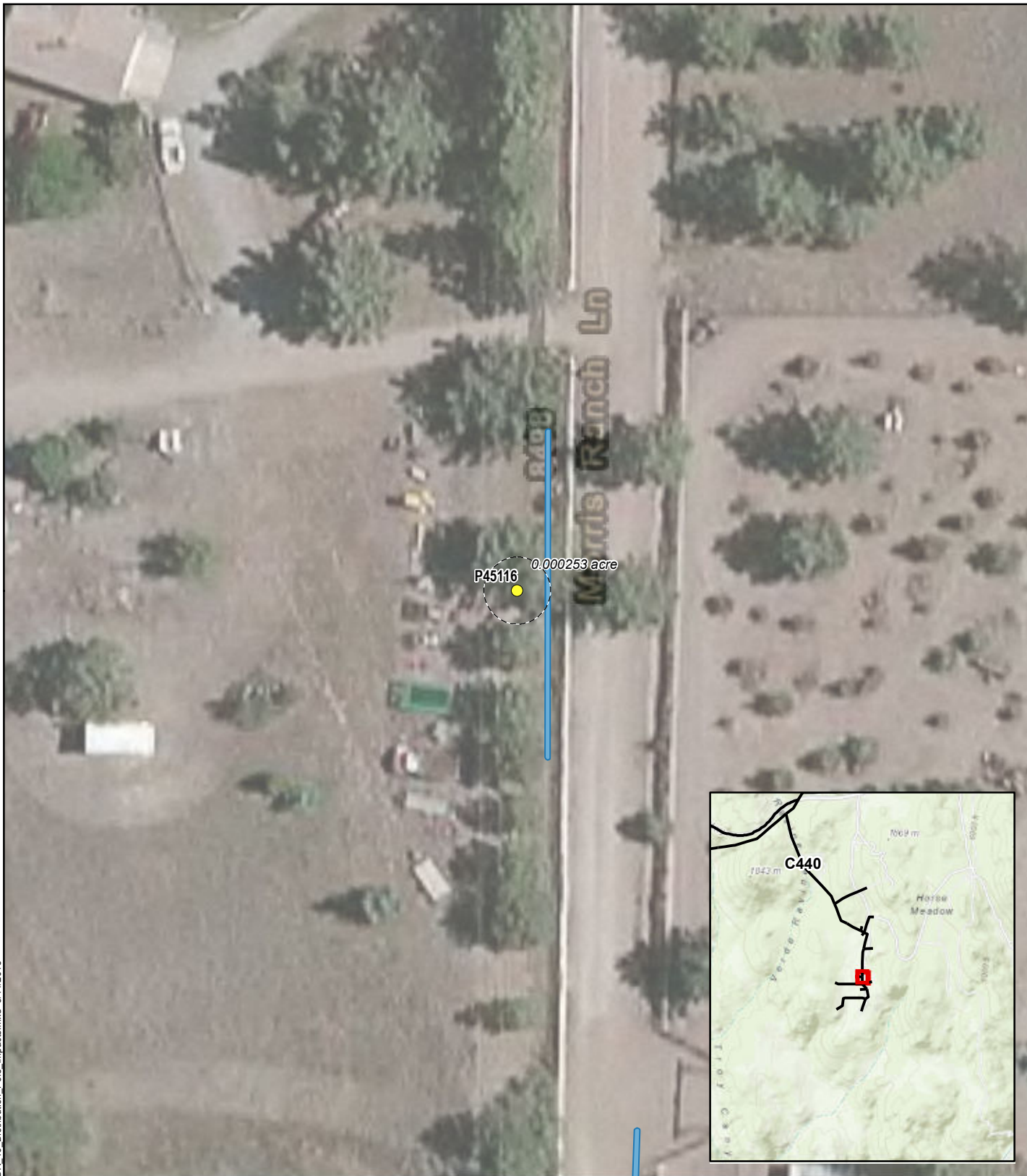


C440 - P40452

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

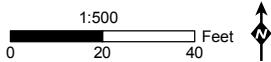




C440 - P45116

CNF Power Line Replacement Projects




- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

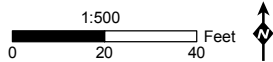




C442 - P178030

CNF Power Line Replacement Projects




-  Pole Location
-  Pole Work Area
-  USACE Jurisdictional Water

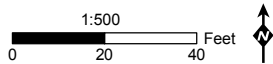




C442 - P178039

CNF Power Line Replacement Projects

-  Pole Location
-  Pole Work Area
-  USACE Jurisdictional Water



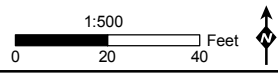
Z:\Projects\SDGE_CNF_ESRP\W\XDs\Adhoc_Requests\DR_10_Distribution_Pole_Impacts.mxd 5/14/2015



C442 - P178044

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

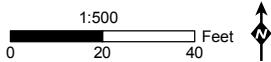




C449 - NEW POLE P-37

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

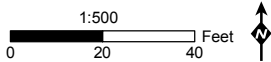




C449 - P104078

CNF Power Line Replacement Projects




- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

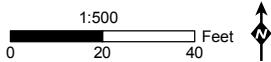




C449 - P42798

CNF Power Line Replacement Projects

-  Pole Location
-  Pole Work Area
-  USACE Jurisdictional Water





C449 - P46464

CNF Power Line Replacement Projects

- Pole Location
- Pole Work Area
- USACE Jurisdictional Water

