

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Ms. Rebecca Giles
Regulatory Case Administrator
San Diego Gas & Electric
Southern California Gas Company

October 30, 2012

(Sent via email: rgiles@semprautilities.com)

***Subject: Data Request No. 1 – Completeness Review
Application No. 12.10.009 - Application for a Permit to Construct - San Diego Gas & Electric Cleveland National Forest Master Special Use Permit Project***

Dear Ms. Giles:

San Diego Gas & Electric (SDG&E) submitted Application (A.12.10.009) for a Permit to Construct to the California Public Utilities Commission (CPUC) on October 17, 2012. As part of the application submittal, SDG&E provided Volume II, Preliminary Plan of Development (POD), dated September 2012, in support of the subject project and Master Special Use Permit to be issued by the U.S. Forest Service—Cleveland National Forest. The California Public Utilities Commission (CPUC) agreed to accept the POD in lieu of the Proponents Environmental Assessment (PEA) typically required when applying for a Permit to Construct.

Both the CPUC's *Information and Criteria List* and the *Working Draft PEA Checklist for Transmission Line and Substation Projects* were used as a basis for evaluating completeness and ensuring that sufficient information is available in the POD so that the CPUC can conduct the environmental analysis required by the California Environmental Quality Act (CEQA). Based on review of the Preliminary POD, CPUC finds that more data will be needed in order to conduct the environmental analysis under CEQA. Please see Attachment A for a list of information the PUC will need to complete its review of SDG&E's application.

If you have any questions regarding this letter or need additional information, please contact me at 415-703-1966 or lob@cpuc.ca.gov.

Sincerely,

MJ Orsaba

Lisa Orsaba
Energy Division
California Public Utilities Commission

Attachment A: Data Request No. 1, Completeness Review for the SDG&E Cleveland National Forest Master Special Use Permit Project

cc: Bob Hawkins, Consulting Natural Resource Planner, U.S. Forest Service
John Porteous, Dudek

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ADMINISTRATIVE

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.

GEOGRAPHIC INFORMATION SYSTEM (GIS) DATA REQUESTS

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

PURPOSE AND NEED

No additional information is requested.

PROJECT DESCRIPTION

No additional information is requested.

ALTERNATIVES

No additional information is requested.

CUMULATIVE PROJECTS

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.

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PRELIMINARY ENVIRONMENTAL RESOURCE EVALUATION (SECTION 10 OF POD)

General Comments

- 1) Please provide the same level of detail for the connected actions and similar actions scenarios as the proposed action.
- 2) Please provide supporting technical reports/data for resource sections (e.g., air quality, biological resources, cultural resources, noise).
- 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.
- 4) Please provide a description of the federal, state, and local regulatory environment.
- 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).

Air Quality

- 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)

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- 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.
- 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 available from the supporting calculation, please provide tables showing the annual and maximum daily emissions by calendar year.
- 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.
- 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.
- 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.
- 6) Please provide a table showing the cumulative daily emissions due to overlapping construction activities for the proposed action, connected actions, and similar actions.

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The emissions of the collective project should also be compared to the significance thresholds, and not just each separate action or project.

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 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.

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Biological Resources

- 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).
- 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.

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

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- 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.
- 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.
- 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.
- 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.
- 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.

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- 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 (*Polioptila 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.

Cultural Resources

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.

Noise

- 1) In addition to the information included in the POD, please provide the Noise and Vibration Technical Report
- 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.
- 3) Please provide an existing conditions section identifying existing land uses, noise sensitive receptors, and ambient noise levels.

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- 4) Please include a description of the noise methodology and equipment.
- 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.
- 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.
- 7) Please identify potential blasting noise and vibration levels as an alternative method for steel pole installation, compare to County's noise limits (both Leq(8) and impulsive noise level limits) and applicable vibration thresholds.
- 8) Please include a discussion of the noise and vibration impacts associated with the undergrounding (jack-and-bore or trenching construction).
- 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.
- 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.
- 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.
- 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.
- 13) Please quantify/discuss the residual impact after mitigation.

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

Visual Resources

- 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.
- 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.

Wilderness and Recreation

- 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?
- 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.

Fire Hazards

No additional information is requested.

Hydrology

No additional information is requested.

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Traffic and Transportation

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

ATTACHMENTS

Attachment F

- 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.
- 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?
- 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.
- 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.
- 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.

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- 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?
- 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?
- 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.
- 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).
- 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

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Key Viewpoint (KVP)	# Existing Pole Structures (tangent/angle)	Approx. Height (feet)	# Proposed Pole Structures (tangent/angle)	Max. Height (feet)
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
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

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