

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 10, 2013

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

(via email: RGiles@semprautilities.com)

Subject: San Diego Gas & Electric Company — TL 637 Wood-to-Steel Project, Permit to Construct Application No. A.13-03-003 — Completeness Review

Dear Ms. Giles:

The Energy Division of the California Public Utilities Commission (CPUC) has completed its review of San Diego Gas & Electric's (SDG&E's) Application (A.13-03-003) for a Permit to Construct the TL 637 Wood-to-Steel Project, including the confidential Cultural Resources Report and Appendices submitted on April 22, 2013. The CPUC has determined the Application/Proponents Environmental Assessment (PEA), as well as the Cultural Resources Report, contain sufficient information to satisfy the requirements of the CPUC's Information and Criteria List, as well as the Proponent's Environmental Assessment (PEA) Checklist, and can be deemed complete.

As noted in the April 12, 2013 preliminary completeness review letter, the CPUC has identified additional data needs as listed in Attachment A. This request for additional information does not constitute a deficiency, but is necessary to complete the California Environmental Quality Act (CEQA) analysis for the subject project. Please note that this determination has been made with the understanding that the CPUC may request additional data, as necessary, to review and analyze the potential environmental effects of the proposed project in accordance with CEQA requirements.

If you have any questions or need additional information, please contact me at 415.703.3175 or lon.payne@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lon Payne', written over a horizontal line.

Lon Payne, Project Manager
Energy Division
California Public Utilities Commission

Att: Attachment A, Data Request No. 1 – May 10, 2013
cc: John Porteous (jporteous@dudek.com)
Rica Nitka (rmitka@dudek.com)

ATTACHMENT A
Data Request No. 1– May 10, 2013
Application No. A.13-03-003
SDG&E TL 637 Wood-to-Steel Project

ADMINISTRATIVE

- 1) Please provide the list of public agencies and other interested parties as well as the parcel and mailing information for properties within 300 feet of the proposed project electronically in Excel format (Application Appendix C and PEA Appendix 1-B).
- 2) In addition to the public support information provided in PEA Section 1.6 and Appendix 1-A, please indicate if additional outreach has occurred. If yes, please provide information regarding any agency and public involvement contacts and correspondence to date. Please include names, addresses, phone numbers, and e-mail addresses.

GEOGRAPHIC INFORMATION SYSTEM (GIS) DATA REQUESTS

- 1) Please provide the following digitally formatted GIS data in the CA State Plane Zone VI NAD83 Feet coordinates/projection:
 - Proposed Tie-Line (TL) 637 alignment
 - Existing TL 637 alignment
 - Mile markers
 - Proposed pole locations (micropile foundation pole, direct bury pole, pole top work, temporary pole, guard structure, proposed anchor, proposed sled and block
 - Staging areas
 - Stringing sites
 - Helicopter landing zone
 - Turn around area
 - Permanent and temporary right-of-way
 - Underground / trenching
 - Creelman and Santa Ysabel Substation fence and property line boundaries
 - Mt. Gower and Simon Preserve area boundaries
 - Project access roads
 - Key observation point (KOP) locations
 - Visual simulation locations

- Vegetation communities
- Special-status plant and wildlife species
- Permanent and temporary impact data
- Potential jurisdictional streams
- National Wetlands Inventory (NWI) wetlands
- Sensitive receptor locations
- Roadways listed in Tables 4.14-1 and 4.14-2
- Cumulative project points within vicinity of project and 1-mile buffer
- Environmental Data Resources (EDR) search boundary
- California Natural Diversity Database (CNDDDB) locations
- U.S. Fish and Wildlife Service (USFWS) occurrence data
- Watersheds/sub-areas

SECTION 1 PEA SUMMARY

No additional information required.

SECTION 2 PURPOSE AND NEED

No additional information required.

SECTION 3 PROJECT DESCRIPTION

- 1) Section 3.2 states that a portion of TL 637 is shared with TL 626 near the Santa Ysabel substation and that 12 poles are double circuit supporting both TL 637 and TL 626. Please provide the pole numbers that are double circuit and that support both TL 637 and TL 626.
- 2) Section 3.3.2 describes minor changes that would occur at the Creelman and Santa Ysabel substations. Please confirm the proposed modifications will not change the bulk and scale of either substation.
- 3) Section 3.4.9.1 discusses work areas. Please describe the current condition of the Warnock Staging Yard, Creelman Staging Yard, Santa Ysabel Staging Yard, and the Littlepage Road Helicopter Landing Zone. Please describe site preparation activities and methods as well as if vegetation clearing will be required at these sites.

ATTACHMENT A
Data Request No. 1
SDG&E TL 637 Wood-to-Steel Project

- 4) Section 3.4.9.5 indicates construction is anticipated to occur both within and outside of the existing right-of-way (ROW). Please clarify why no temporary construction easement is required if construction occurs outside of the existing ROW.
- 5) Section 3.11 Required Approvals discusses an on-site meeting with BLM and the County regarding the Mt. Grower Preserve and Simon Preserve. Please provide the names and contact information for BLM and County representatives who attended.
- 6) Section 3.11.1 Cleveland National Forest states that this segment poles P115 and P 116 have already been replaced. Please provide a photograph showing the newly replaced poles.
- 7) Please provide the approximate distance from the ground to the lowest conductor.
- 8) If known, please provide the locations of which poles would be removed and or installed using a helicopter.
- 9) Please provide a summary table of total temporary impacts by project component (e.g., poles, substation, work areas).
- 10) Please provide the right-of-way corridor width and confirm there will be no changes to SDG&E's existing right-of-way for this pole replacement project.
- 11) The PEA states that no net increase in permanent impacts will occur. The PEA pages 3-11 and 3-12 described permanent impacts associated with new poles (micropile construction would require permanent impacts of approximately 39 square feet per pole and directly embedded steel poles would require approximately 5 to 10 square feet per pole. PEA Tables 4.4-2 and 4.4-5 provide estimated impact for both temporary and permanent impacts. Please clarify permanent impact associated with the project – also see request under 4.4 Biological Resources, item 4.

SECTION 4 ENVIRONMENTAL IMPACT ASSESSMENT

4.1 Aesthetics

- 1) Please provide jpegs (1 MB or better quality) of Photographs 1-18 that were used in the PEA to establish the existing visual setting of the Proposed Project. In addition, please provide jpegs of visual simulations of the Proposed Project presented in Figures 4.1-4 through 4.1-8.

ATTACHMENT A
Data Request No. 1
SDG&E TL 637 Wood-to-Steel Project

- 2) Please provide GIS data (shapefiles) for BLM Visual Resource Management designations along the Proposed Project alignment. Also, please identify the applicable Resource Management Plan (RMP) or other plan for BLM lands traversed by the Proposed Project.
- 3) Section 4.1.3.5 (Local) states that in addition to the Ramona Community Plan area, the Proposed Project alignment would also traverse lands within the Central Mountain and North Mountain Subregional Planning areas yet a discussion pertaining to policies established in these plans is not provided. Please identify the relevant and applicable policies from these plans or confirm that the plans were reviewed and no policies were determined to be applicable.
- 4) The Project Description mentions that the entire power line would be reconducted. Would reconducting entail any noticeable visual effects associated with glare?
- 5) In Section 4.1.4.5 (Operations and Maintenance), the text provides ranges of heights when comparing existing and proposed transmission structures. Please clarify the heights of existing and proposed structures depicted in Figures 4.1-4 through 4.1-8.
- 6) Please clarify and provide additional information regarding construction activities along the alignment. How long would construction activities generally take at each pole location? How long would construction activities occur within each Land Use Unit?

4.2 Agriculture and Forestry Resources

No additional information required.

4.3 Air Quality and Greenhouse Gases

- 1) Table 4.3-9 in Section 4.3 should include sulfur oxide (SO_x) emissions.
- 2) Please provide a citation for the greenhouse gas thresholds proposed (or adopted) by the County of San Diego and South Coast Air Quality Management District so that the thresholds can be reviewed and evaluated as to their applicability to the proposed project.
- 3) In light of the County of San Diego's adoption of a Climate Action Plan (CAP) in June 2012, Section 4.3.4.10 should include a brief discussion of the CAP as well as the proposed project's potential conflicts or consistency with the CAP.
- 4) Appendix 4.3-A:

ATTACHMENT A
Data Request No. 1
SDG&E TL 637 Wood-to-Steel Project

- a. Table 4.3-A(1), Worker Trip Emission Calculations, does not show the running and paved road emission factors for PM₁₀ and PM_{2.5}, emission factors carbon dioxide (CO₂), and the running exhaust emission factor for methane (CH₄). Please provide a revised spreadsheet showing a complete set of emission factors.
- b. Table 4.3-A (2), Construction Truck Emission Calculations – Crux, uses an outdated calculation for paved road dust. The current methodology is found in Chapter 13.2.1 (Paved Road Dust) of the U.S. Environmental Protection Agency’s *Compilation of Air Pollutant Emission Factors (AP-42)*, which was published in January 2011. Furthermore, this method advises that the paved road dust calculations should not be performed for individual vehicle weight classes. Rather, the average weight of vehicles traveling on the roadways should be used. We recommend using 2.4 tons per vehicle as indicated in the CalEEMod User’s Guide, Appendix D, Table 4.1. Also, the paved road PM_{2.5} emission factors and units for PM₁₀ and PM_{2.5} (pounds per mile) should be shown in the spreadsheet.
- c. Table 4.3-A (3), Construction Truck Emission Calculations – H&M: See comments on Table 4.3-A (2).
- d. The following spreadsheets include vehicles that may be on-road trucks. These spreadsheets calculate the emissions from these vehicles as if they were heavy off-road diesel equipment. This approach would result in an overestimate of their emissions. The emission calculations for on-road trucks should be based on emission factors for on-road vehicles similar to what was done for the “crux” and “H&M components.”

| Table Number | Probable On-Road Vehicles |
|--|---|
| Table 4.3-A(4), Construction Heavy Equipment Emissions – Drilling | transport unit and flatbed truck |
| Table 4.3-A(6), Construction Heavy Equipment Emissions – Cap and Test | Transport unit, tractor-trailer unit, and flatbed truck |
| Table 4.3-A(8), Construction Heavy Equipment Emissions – Construction of Shoe-Fly | Bucket truck |
| Table 4.3-A(9), Construction Heavy Equipment Emissions – Mobilization | Tractor-trailer unit |
| Table 4.3-A(10), Construction Heavy Equipment Emissions – Power Line Installation | Bucket truck and line truck |
| Table 4.3-A(13), Construction Heavy Equipment Emissions – Underground Construction | Line truck, crew truck, and splice van |
| Table 4.3-A(14) – Demobilization | Tractor-trailer rig and crew truck |
| Table 4.3-A(15) – Cleanup | Crew truck |

- e. Table 4.3-10 shows that helicopter greenhouse gas emissions as 99 metric tons CO₂e, while Table 4.3-A (16), Helicopter Emissions, shows them as 55.28 metric tons CO₂e. Please review the apparent discrepancy and provide the correct value.

4.4 Biological Resources

- 1) If blasting occurs, please describe if there will be timing restrictions to avoid impacts to Migratory Bird Treaty Act species.
- 2) Section 3.4.9.6 states that maintenance and vegetation removal may occur but is covered under SDG&E's NCCP and no mitigation is required. Please elaborate on what the maximum road widths would include, how maintenance will be tracked to ensure that excess vegetation is not removed, and what will happen if excess vegetation is removed.
- 3) Please confirm that no new access roads will be cleared or graded.
- 4) Please confirm that Tables 4.4-2 through 4.4-5 include all temporary and permanent impacts associated with the proposed project, including, but not exclusive of micropile construction, steel pole construction, pole removal, guard pole installation, conductor stringing, dewatering, blasting, undergrounding, storage and staging areas, helicopter landing areas, stringing sites, pole and guard sites, and substation work.
- 5) Please confirm that no trees will be removed as part of the construction of this project. Also, please identify where trees will require trimming.
- 6) Please confirm if all species sensitivity status' and references were current as of the December 2012 Biological Technical Report (BTR) publish date.
- 7) Vegetation mapping for the project appears to have only been mapped at a gross scale and there appear to be several errors - these errors may have affected the focused survey efforts (Non-inclusive examples include Figure 4.2 of 15 - areas mapped as urban and developed/ornamental appear to include CSS and grasslands, or at least pastures (ag) - does not match report descriptions; sheet 3 of 15 - See County Parks maps for Simon (http://www.sdcounty.ca.gov/reusable_components/images/parks/doc/Simon_RMP_Final_Clean.pdf) - areas east of slope should be mapped as CSS, grassland, and chaparral; sheet 4 of 15 - area adjacent to Gower should include inclusions of CSS/mixed chaparral; Sheet 5 of 15 - How is grassland differentiated from Pasture (ag) and Disturbed? It is difficult to determine from text. It appears that much of this area should be mapped as grassland or Ag. instead of Disturbed - there are also inclusions of CSS or chaparral within areas mapped as

ATTACHMENT A
Data Request No. 1
SDG&E TL 637 Wood-to-Steel Project

Disturbed; Sheet 6 of 15 - areas mapped as Disturbed should be mapped as CSS or chaparral and grassland/Ag., is the area mapped as southern riparian forest really oak riparian forest?, at SS12, there appears to be a fringe of scrub or chaparral between the disturbed area and the adjacent road, are there inclusions of scrub habitat within the southern mixed chaparral mapping?; sheet 8 of 15 - It appears that some areas mapped as Disturbed should be switched to Ag., some areas mapped as grasslands should be scrub and oak savanna; sheet 9 of 15 - some grasslands should be mapped as oak savanna and meadows; sheet 11 of 15 - some grassland areas should be mapped as scrub, chaparral, and oak savanna, some oak savanna areas should be mapped as oak woodland and scrub/chaparral; other issues related to mapping throughout. Suggest remapping the alignment.

- 8) Please provide the minimum mapping unit for mapping vegetation communities.
- 9) Please provide a table of survey condition, personnel, dates, and times.
- 10) Please explain the process for determining which species would be surveyed or analyzed.
- 11) Please explain what buffer area was surveyed for wildlife species (e.g., quino checkerspot, CAGN).
- 12) Please provide all focused survey reports (e.g., special-status plants, CAGN, QCB) and habitat assessment reports (e.g., Hermes copper, vernal pool species, ARTO, LBVI, WIFL, etc.)
- 13) It appears that suitable habitat for CAGN exists in the project area that was not identified in the vegetation mapping. Please review and provide updated mapping and information on CAGN.
- 14) Please describe if there were any survey limitations.
- 15) San Diego fairy shrimp has the potential to occur within road ruts and are known to occur within a number of such areas within the Ramona area. The BTR stated that road rut areas were located outside the project area and will be avoided. Please explain if the associated watersheds would be avoided as well.
- 16) Exclusive use of database queries should not be the sole measure of potential to occur, as species may not yet have been recorded in the databases queried. For example:
 - a. ringtail is known to occur within the riparian band on BTR Figure 4 sheet 6 of 15. Please provide analysis for that species.

ATTACHMENT A
Data Request No. 1
SDG&E TL 637 Wood-to-Steel Project

- b. white-tailed kite is expected to have a moderate potential to nest within the various oaks and the riparian band throughout the site - particularly at the lower elevations. Please provide analysis for that species.
 - c. various rock outcrops and trees within the right-of-way would have potential to support roosting bats. Please provide information regarding bats that acknowledges this potential.
- 17) Regarding the special-status species analyzed – please explain the level of sensitivity that was analyzed for potential to occur (CNPS, CDFW, FWS, BLM, USFS, County lists, etc.).
- 18) Please provide a copy of the wetland delineation including supporting data sheets and other documentation.

4.5 Cultural Resources

- 1) Please provide an electronic copy of the project cultural resources report. Please include copies of all site records, reports, and maps. Please also provide copies of all letters and documentation of Native American consultation.

4.6 Geology, Soils, and Mineral Resources

- 1) Please provide the geotechnical investigation completed by VO Engineering (2011).

4.7 Hazards and Hazardous Materials

- 1) PEA Section 1.7.4 indicates the SDG&E noticed the Federal Aviation Administration (FAA) regarding two pole locations in accordance with CR part 77.9. Please indicate the airport(s) and the two poles for which the aeronautical study was completed.
- 2) Section 4.14.3.6 Airports describes the closest airport to the project is the Ramona Airport located approximately 3.2 miles west of the western terminus of the project and Section 4.7.3.7 Airports describes that the closest airport to the project is approximately 1.8 miles to the northwest of TL 637. Please clarify. Also, please provide a complete list of airports (private and municipal) within the project vicinity and distance from project and confirm that no other project components require FAA noticing
- 3) Please provide the source for Table 4.7-1 Hazardous Material Sites Adjacent to the Proposed Project.

4.8 Hydrology and Water Quality

- 1) For all surface water bodies (rivers, creeks, and other water bodies) crossed by the project, please provide in table format the pole number, name of water body –if unnamed state so, feature type and flow characteristics
- 2) Please provide permanent as well as temporary impacts to all surface water bodies.

4.9 Land Use and Planning

- 1) Table 4.9-1 presents designated and existing land uses in the proposed project area by Land Use Unit. Please either provide land use information by milepost or provide the lengths of TL 637 through each land use unit. For example, from milepost x to x, TL 637 traverses Land Use Unit 1. In addition, please provide a map that delineates the reference Land Use Units and the GIS information (shapefiles) used to create the map.
- 2) Portions of TL 637 within Land Use Unit 4 would traverse BLM lands. Please provide the relevant BLM land use designations and the applicable Resource Management Plan (RMP) for these lands. If no RMP exists for BLM lands traversed by the Proposed Project, please clarify.
- 3) Within the General Plan Land Use Designation column of Table 4.9-1, Rural Lands is identified several times as the applicable land use designations for various components of the Proposed Project. Please provide the applicable density for each designation (i.e., RL-80, RL-40, etc.).
- 4) Please clarify and provide additional information regarding construction activities along the alignment. Where would the temporary restriction of two-way travel on local roadways be required? How long would construction activities generally take at each pole location? How long would construction activities occur within each Land Use Unit?
- 5) Section 4.9.4.3 acknowledges that local plans and policies do not apply to the Proposed Project and states that the Proposed Project is consistent with the policies and goals of the applicable plans of County lands traversed by TL 637. PEA, Section 4.9.4.3 does not acknowledge the policies of local plans identified in Section 4.9.3.1 and does not provide an analysis that would substantiate the consistency claim. While such projects are exempt from local land use and zoning regulations, consultation with local agencies regarding land use matters potentially affected by the project is required. In order to substantiate the consistency claim made in the PEA, please provide a consistency analysis with local plans and policies.

4.10 Noise

- 1) Noise Setting: Please identify existing noise sensitive receptors, and ambient noise levels along the project alignment.
- 2) Construction impacts assessment: Please include a description of the noise methodology (i.e., Roadway Construction Noise Model, FTA methodology, or?) and equipment consist assumptions (type and number of pieces of equipment).

Also, please note that 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.

Additionally, it is noted that Table 4.10-6 excludes helicopter noise. Please quantify noise expected from helicopter use both during construction and operation/inspections and compare to the San Diego County Noise Ordinance.

- 3) Please quantify the noise and vibration impacts associated with potential blasting activities and disclose noise/vibration levels at the nearest sensitive receptors. These should be compared to all applicable County thresholds (including impulsive noise) prior to introducing mitigation.
- 4) Please include a discussion of the noise and vibration impacts associated with the undergrounding (jack-and-bore or trenching construction).
- 5) 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.
- 6) Please identify which residents, if any, are anticipated to exceed the applicable noise thresholds.

4.11 Population and Housing

No additional information required.

4.12 Public Services

No additional information required.

4.13 Recreation

- 1) Regarding construction activities within the Simon Preserve and Mt Gower Preserve, please describe where any temporary trail use restrictions occur and how long would trail use restrictions occur?

4.14 Transportation and Traffic

- 1) Section 4.14.3.6 Airports describes the closest airport to the project is the Ramona Airport located approximately 3.2 miles west of the western terminus of the project. Section 4.7.3.7 Airports describes that the closest airport to the project is approximately 1.8 miles to the northwest of TL 637. The project proposes to increase the TL 637 pole height on average by 12 feet with a maximum increase of 40 feet. Do any of the proposed poles require noticing to the FAA under CR part 77.9 or would any of the new poles create a safety hazard to nearby airport operations?

4.15 Utilities and Service Systems

- 1) Please provide commitment letter(s) or other correspondence from municipal water agencies confirming that the 2.25 million gallons of water needed for construction is available.

4.16 Cumulative impacts

No additional information required.

SECTION 5 SIGNIFICANT IMPACTS / ALTERNATIVES

No additional information required.

Appendices

- 1) **Appendix 1-C:** The existing power line map shows two insets relating to the Creelman and Santa Ysabel substations. Please describe what these insets are illustrating. Also, please add the portion of TL637 that is shared with TL626.
- 2) **Appendix 3-C:** Typical structure diagrams provide a photo of a typical wood transmission pole with distribution underbuilt. Is this photo taken along TL 637 and if so where? Also, if available please provide a photo of a typical wood to steel conversion with distribution underbuilt.