

**SDGE 07/12/16 Response**  
**South Bay Substation Relocation Project**  
**Notice to Proceed #004 Data Request 1, Dated 07/05/2016**  
**SDG&E Responses 1-6**

**Item 1:**

Please clarify whether the PEA and Final EIR evaluate the environmental impacts associated with the 12 kilovolt (kV) pole removal proposed as part of NTP 004, and as identified in Attachment A of the NTP 004 Request.

**San Diego Gas & Electric (SDG&E) Response to Item 1:**

A section of 12kV distribution service line, which is comprised of six 12 kV poles and is used exclusively in connection with the operation of the existing substation, will be removed as part of the demolition of the South Bay Substation. Environmental impacts associated with the 12 kV pole removal were evaluated within the Proponent's Environmental Assessment (PEA) and the Final Environmental Impact Report (EIR).

The PEA states (Section 3.0.5 South Bay Substation Demolition, page 3-8):

“In addition to the demolition of the existing South Bay Substation, certain transmission structures used exclusively in connection with the operation of the existing South Bay Substation would be removed from the existing 10.47-acre adjacent transmission and distribution easement site as part of the South Bay Substation Relocation Project.”

The Final EIR states (Section B.6.3, page B-49):

“Dismantling would include removal of all SDG&E-owned equipment, such as transformers, circuit breakers, regulators, disconnect switches, insulators, overhead and underground cabling, and the control house.”

Additionally, the Final EIR states (Section B.4.2, page B-29):

“The decommissioning and demolition of the South Bay Substation would include removal of all above-grade components, including both 138 kV and 69 kV transmission equipment (see Figure B-3c and Figure B-8, South Bay Substation Photos).”

**Item 2:**

Please clarify if activities under NTP 002 and NTP 003 will continue to occur during the demolition/dismantling of the South Bay Substation.

**SDG&E Response to Item 2:**

Activities under NTP 002 and NTP 003 will continue to occur during the demolition/dismantling of the South Bay Substation, including road construction, final paving, landscaping, permanent gate installation, security equipment installation, and slope stabilization at the Bay Boulevard Substation.

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**South Bay Substation Relocation Project**  
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**SDG&E Responses 1-6**

**Item 3:**

APM-AES-01/MM BIO-5: Please provide a status update on seeding and planting at the Bay Boulevard Substation (activities authorized under NTP 002) and Transmission Line Components (activities authorized under NTP 003) in accordance with the Conceptual Landscape Plan and the Dust Control Plan, *Section 5.4.0 Revegetation*.

**SDG&E Response to Item 3:**

Seeding and planting at the Bay Boulevard Substation is not a pre-construction requirement for the dismantling/demolition of the existing South Bay Substation. SDG&E has provided a response to Item 3 in the following paragraph.

Temporary stabilization has been installed to maintain compliance with the Construction General Permit and the South Bay Substation Relocation Project-specific Storm Water Pollution Prevention Plan. SDG&E has not started the installation of final landscaping as road construction and paving is underway. SDG&E anticipates on installing final landscaping, in accordance with the Conceptual Landscape Plan, between August and September 2016. Additionally, seeding along the transmission right-of-way will begin once the Transmission Line 13815 lattice towers and their foundations have been removed.

**Item 4:**

BIO-9 Raptor Perch Deterrent Plan: Please provide documentation of perch deterrent devices installed as described in *Table 1, Perching Deterrent Placement on Project Structures* of the Plan.

**SDG&E Response to Item 4:**

Please note that providing documentation of perch deterrent devices is not a pre-construction requirement for demolition of the existing South Bay Substation. A response to Item 4 is provided in the following paragraph.

As reported in the Environmental Compliance Status Report for May 30 to June 5, 2016, the raptor perch deterrent was installed on the microwave communications monopole within the Bay Boulevard Substation on June 2, in accordance with the Project's Raptor Perch Deterrent Plan and Mitigation Measure (MM) BIO-9. Pole ID Numbers 24 (138 kV Steel Riser) and 202 (230 kV Steel Dead-end) were identified in the Raptor Perch Deterrent Plan and have not been constructed. Custom raptor perch deterrents have been procured for the remaining four transmission poles (three new and one existing) identified in the Raptor Perch Deterrent Plan, and they are anticipated to be installed by July 2016, in accordance with MM BIO-9. The anticipated date of custom raptor perch deterrent installation can be provided once it is determined based on the construction schedule.

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**Item 5:**

APM-HAZ-01: Please provide a copy of the Hazardous Materials Survey/work completed at the South Bay Substation in June 2016 in accordance with the Project's Hazardous Substance Management and Emergency Response Plan (HSMERP), Section 5.5.1 Demolition Waste. If hazardous materials were identified, please provide a copy of the work plan that will be used to remediate hazardous materials, and documentation of correspondence with appropriate agencies with respect to the work plan. Additionally, please clarify if the HSMERP adequately addresses management of hazardous substances associated with demolition of the existing South Bay Substation or if the Plan requires an amendment and rationale for conclusion. If the Plan requires an amendment, please resubmit the Plan to the CPUC, with documentation that the Plan has also been resubmitted to the California Coastal Commission as required in the HSMERP.

**SDG&E Response to Item 5:**

As described in Section 5.5.1 Demolition Waste of the Hazardous Substance Management and Emergency Response Plan and Site Assessment (HSMERP), SDG&E anticipated that dismantling the South Bay Substation could uncover oil, lead-based paint, asbestos-containing material (ACM), and oil containing polychlorinated biphenyls (PCBs). SDG&E performed a sampling of oil-filled electrical equipment at the site on April 19 and 20, 2016 to identify which equipment contains oil with PCBs. Two of the potential 138 kV transformers were found to contain PCBs, and the disconnect switches are presumed to contain PCBs. All oil will be drained from oil-filled electrical equipment prior to the start of demolition, and oil containing PCBs will be properly disposed of at an authorized disposal or recycling facility. All other oil-filled equipment (i.e., disconnect switches) will be presumed to contain PCB oil and will be disposed of at an authorized disposal facility. A survey of ACM and paint sampling for the South Bay Substation was performed on June 8 and June 9, 2016. Concrete, asphalt, roofing materials, mastics, and wire coatings were sampled during this event. The laboratory results indicated that the asphalt core samples are not ACM; however, various roofing materials sampled were found to contain up to five-percent chrysotile asbestos. Gaskets, electrical conductors, and heat shields are also presumed to be ACM. As described in the HSMERP, ACM and suspected ACM will be removed in accordance with applicable regulations by properly licensed and trained contractors.

SDG&E also anticipates that limited amounts of soil will be removed from the site during demolition associated with the removal of concrete foundations. The soil will be sampled in situ during the demolition work for proper waste characterization and disposal or recycling. Based on the prior site assessments described in the HSMERP, SDG&E does not anticipate encountering any contaminated soil during this work. SDG&E is in the process of contracting with an abatement contractor to perform this work in coordination with the demolition contractor; however, a work plan will not be required by any regulatory agencies. Hazardous materials will be managed and disposed of in accordance with the HSMERP, and no revisions to the Plan are anticipated as a consequence of the sampling results.

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**Item 6:**

APM-TRA-01: Please clarify whether an updated Traffic Control Plan will be required from the City of Chula Vista to support activities requested.

**SDG&E Response to Item 6:**

The Traffic Management Plan (TMP) was approved by the CPUC on September 26, 2014 and considered all phases of construction. Documentation demonstrating coordination with the City of Chula Vista was included as Attachment A: City of Chula Vista Letter of Coordination in the TMP. At this time a traffic control permit issued by the City of Chula Vista is not anticipated for work associated with demolition activities. If it becomes necessary, SDG&E will obtain a traffic control permit and will provide a copy to the CPUC prior to initiating traffic control on Bay Boulevard.