PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 25, 2013

Ms. Jennifer Pierce
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Review of San Diego Gas and Electric Company's Application for a Permit to Construct the Salt Creek Substation Project (A. 13-09-014)

Dear Ms. Pierce:

The Energy Division of the California Public Utilities Commission (CPUC) has completed its first review of San Diego Gas and Electric Company's (SDG&E) application (A. 13-09-014) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct the Salt Creek Substation Project.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of SDG&E's application for the Salt Creek Substation Project, the Energy Division finds that the information contained in the PEA is incomplete. The attached report identifies the portions of the application found to be deficient.

Information provided by SDG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A. 13-09-014. We request that SDG&E respond to this report no later than November 25, 2013.

The Energy Division will review all supplemental information to assess its adequacy and will issue a determination when information in SDG&E's application and PEA is deemed adequate and complete. The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SDG&E's Permit to Construct be approved.

Please direct questions related to this application to Jason Coontz at the CPUC.

Sincerely,

Jason Coontz
California Public Utilities Commission

DEFICIENCY REPORT FOR THE SDG&E SALT CREEK SUBSTATION PROJECT APPLICATION (A. 13-09-014)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in the application (A.13-09-014) and Proponent's Environmental Assessment (PEA) for San Diego Gas and Electric Company's (SDG&E) Application 13-09-014 for a Permit to Construct the Salt Creek Substation Project. Deficiencies were identified using the CPUC PEA Checklist (November 2008) and the CPUC Information and Criteria List (July 2008). Deficiencies are presented in Table 1.

Table 1: SDG&E Salt Creek Substation Project Application 13-09-014 Deficiencies

#	PEA Section(s)/ Page #	Deficiency
Project Description		
1	Section 3.5.2.1, Page 3-45; Section 4.16, Question 4.16(c), Page 4.16-13	**Section 3.7.1.4 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding helicopter access and utilization.** ***Clarify the scope of helicopter use during project construction. Define the expected duration and frequency of helicopter use during construction and operation of the project. Identify all helicopter fly yards that may be used for the project and the locations of helicopter refueling areas. Describe helicopter flight paths.*** The PEA Project Description states that helicopters may be used for installation of overhead conductor and for installation of poles. The PEA Transportation and Traffic section states that helicopter use is only anticipated for stringing the sock line for TL 6965. Please clarify whether helicopters would be used to pick up materials from workspaces outside of the helicopter fly yard/incidental landing area.
2	Section 3.5.8, Table 3-5 and page 3-57	**Section 3.7.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding the construction workforce and equipment.** ***Provide the number/quantities of equipment that would be used on the project for each construction activity. Identify the number of workers associated with each activity, the estimated usage level for each piece of equipment (hours/day), and the estimated duration for the activity.*** Additional information on the construction workforce and equipment is

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		required as described in the PEA Checklist (refer to the sample table in Section 3.7.5 of the PEA Checklist). This additional detail is needed to define air quality, noise, and traffic impacts for the project.
Aesthetics		
3	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations.** ***Provide details on the methodology used to create the visual simulations.*** The PEA does not adequately describe the methods used to capture images of the baseline visual conditions and the methods and software used in the production of the visual simulations. This information is required to substantiate the accuracy and authenticity of the simulations. Provide the following data for each photograph used at the key views and in the simulations: a. Camera make and model b. Film size or digital sensor dimensions c. Lens make and model d. Focal length used for each image e. GPS camera location f. Horizontal and vertical azimuth of the camera frame's nadir g. Time of day h. Single frame or digital stitched images i. Locations and GPS coordinates of any survey control points provenienced j. 3D modeling software used k. How the 3D view was generated to approximate the camera location l. How the model and the baseline photograph were digitally merged to produce the final photo montage
Air Quality and Greenhouse Gases		
4	Appendix 4.3-A and Section 3.5.8	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality and greenhouse gas modeling.** ***The equipment identified in the Project Description does not match the equipment identified in the air quality analysis. Please verify the equipment that will be used by the project and remodel to account for air quality and greenhouse gas emissions from all equipment and vehicles that are expected***

Table 1: SDG&E Salt Creek Substation Project Application 13-09-014 Deficiencies		
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		to be used during construction, including helicopters. The air quality model did not include the following equipment that were listed in the Project Description: 1. Asphalt grinder 2. Boom truck with trailer 3. Cable dolly 4. Concrete saw 5. Crane (30-ton) 6. Cat track hoe 7. Pick-up truck 8. Digger/boom truck with material trailer 9. Dump truck with compressor & emulsion sprayer 10. Flatbed truck 11. Flatbed truck (2-ton) 12. Handheld compactor 13. HD flatbed with reel carriers 14. Helicopter 15. Large crane 16. Line assist truck 17. Material/crew truck 18. Oil processing rig 19. Pick-up truck (3/4-ton or 1-ton) 20. Pickup with saw cut trailer 21. Roller 22. Scraper 23. Splice trailer 24. Splice trailer (UG cable) 25. Spreader 26. UG combo truck 27. UG puller trailer (7,000-pound) 28. Vacuum pump The air quality model included the following equipment that were not listed in the Project Description: 1. Street sweeper 2. Ditch witch/trencher
5	Appendix	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and**

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#	**PEA Section(s)/ Page #**	**Deficiency**
	4.3-A	**Criteria List regarding air quality and greenhouse gas modeling.** ***Provide updated air quality and greenhouse gas emissions modeling results using the CARB reduced load factors for off-road equipment. Alternatively, it is recommended that SDG&E update the emissions modeling using CalEEMod, which incorporates the reduced load factors.*** Page 4.3.A-1 of Appendix 4.3-A states that, "Emission factors from the OFFROAD Model were based on the South Coast Air Quality Management District's . . . composite off-road emission factors (SCAQMD 2012) and/or a mix of Tier 2 and Tier 3 equipment." Use of emission rates from OFFROAD or the SCAQMD emission rates do not include the latest load factors. CARB reduced load factors by 33 percent for most off-road equipment in 2010 (which are reflected in the latest version of CalEEMod). Updating the air quality and greenhouse gas emissions modeling using CalEEMod will correct these inconsistencies. The PEA air emissions calculations do not use CalEEMod, but instead appear to use manual calculations. CalEEMod uses the best available information regarding construction equipment emissions and on-road vehicles emissions. CalEEMod also incorporates the latest versions and emission factors in the OFFROAD and EMFAC2011 models. If SDG&E elects to update the emissions modeling using manual calculations, further documentation is required to support the use of manual calculations. Identify any differences between the manual calculations and CalEEMod, and describe why the manual calculations were used in lieu of CalEEMod.
Biology		
6	Section 4.4, Tables 4.4-3 and 4.4-4	**Section 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding potential presence of special-status species.** ***Define the potential to occur in the project area for each special-status species listed by the California Natural Diversity Database (CNDDB) within the Jamul Mountains, Otay Mesa, Imperial Beach, National City, Otay Mountain, Dulzura, La Mesa, El Cajon, and Alpine quadrangle areas.*** Section 4.4 of the PEA and the Biological Resources Technical Report (BRTR) state that the CNDDB nine-quadrangle area surrounding the project was reviewed to identify special-status species that may occur within the project area. A number of special-status species that are listed in the CNDDB nine-quadrangle area were not identified or addressed in the PEA or BRTR. The potential for each of these species to occur in the project area must be defined

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		with evidence (e.g., potential of suitable habitat or distance to nearest suitable habitat area) to substantiate the potential. These additional species that should be addressed in the PEA are identified in Appendix A to this document.
Cultural Resources		
7	Sections 4.4 and 4.5	**Sections 5.3 and 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding surveys for biological and cultural resources.** ***Provide biological and cultural resource survey reports for alternate staging areas.*** The PEA did not include survey data for the Olympic Training Center alternate staging areas. These data are required to evaluate the potential impacts of staging in these locations.
8	Section 4.5	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding impacts to cultural resources.** ***Revise the impact analysis to reflect that work within the boundaries of known archaeological sites could result in potentially significant impacts, regardless of whether or not the main loci of the sites are avoided. Revise the impact assessment to address impacts to potentially significant cultural resources along project access roads, staging areas, and areas where surveys were limited by poor visibility. Prepare a Cultural Resources Monitoring and Mitigation Plan (including more extensive in-field monitoring) and a Treatment Plan in accordance with CEQA Guidelines Sections 15064.5 and 15126. 4 prior to publication of the Final CEQA document.*** Construction of the proposed project would occur within the boundaries of nine large, potentially significant cultural sites. Work within these sites must be treated as significant (PEA page 4.5-9). Only small portions of the sites were tested and, therefore, avoiding loci within these sites cannot be considered as avoiding the site, which has an encompassing border. Additionally, project archaeological surveys were commonly limited by heavy vegetation and very low visibility, limiting the effectiveness of the surveys. Some roads would require widening and modification that would require cut-and-fill operations for use of heavy equipment, the impacts of which are not adequately addressed in the PEA. The Applicant Proposed Measures (APMs) provided in the PEA do not

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		adequately mitigate the potential impacts of the project. APM-CUL-3 (page 4.5-28) calls for limited monitoring in the immediate area of some of these sites and within the existing substation property. APM-CUL-2 (page 4.5-28) states that significant cultural resources along pole replacements and stringing sites (i.e., CA-SDIs 4529, 4897, 7197, 12067, 4897, 7197, 12067, and 12909) would be preserved in place or, if not feasible, would be evaluated. The measure indicates that a Research Design and Data Recovery Program would be prepared at that time, if necessary. Preparing a Research Design and Data Recovery Program during construction would likely be disruptive to the construction schedule. The measure also does not include lead agency review and approval, and does not ensure that impacts are adequately mitigated. Large numbers of resources are likely to be found during construction. A curation agreement must be in place with San Diego California Historic Resources Inventory System (CHRIS) prior to construction to handle these resources. To adequately mitigate the potentially significant effects of working within the boundaries of known, potentially significant resources, and to address the potential for encountering new resources in other areas where surveys were limited, a Cultural Resources Monitoring and Mitigation Plan (CMMP) and a Treatment Plan (TP), prepared in accordance with CEQA Guidelines Sections 15064.5 and 15126.4, must be established and approved by CPUC prior to construction. The CMMP should establish methods for resolving adverse effects through recovery of significant information from archaeological sites. At a minimum, the CMMP should include the following: • A summary of available information on known sites and sensitive locations in the project area • A historical context for the evaluation of resources that may be encountered during construction • A research design outlining important historical themes and research questions relevant to the known sites in the study area • Data requirements and the appropriate field and laboratory methods to be used to acquire data needed for significance evaluation and impact mitigation • Specific project areas where cultural resource monitors would be required during construction, including along access roads and staging areas where surveys were limited due to heavy vegetation and low visibility (and not just within the boundaries

Table 1: SDG&E Salt Creek Substation Project Application 13-09-014 Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
		of known sites) The TP should identify reporting and curating requirements for artifacts uncovered during construction.
9	Section 4.5	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys.** ***Provide a map and GIS layers that show all survey areas relied upon for the cultural resource analysis (including areas from the HDR surveys [Clowery and Blotner 2012]). Ensure that all project areas, including all access roads, staging areas, and project construction areas, have been adequately surveyed.*** The project survey areas are not clearly defined in the PEA. All project work areas must be surveyed to ensure that project impacts are disclosed and adequately addressed. Provide a map and GIS layers showing the surveyed areas, including any areas surveyed in previous reports, so that they can be compared with all work areas described in the Project Description.
Geology and Soils		
10	Section 4.6	**Section 5.6 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding importation of fill.** ***Confirm the amount of fill to be imported for the project.*** The project description states there will be 94,000 cubic yards (CY) of cut and 138,000 CY of fill with 44,000 CY of import soil. The geotechnical report states that some of the cut soils may be unsuitable for use as fill, which would require additional soil to be imported to the site above and beyond the 44,000 CY estimated. Please confirm the amount of fill to be imported. If a precise number cannot be provided, please provide a "worst-case scenario" estimate of additional soils that would need to be imported and a description of how the cut soils will be evaluated for suitability as on-site fill. The worst-case scenario should be factored into the air, greenhouse gas, noise, and traffic analyses.
Greenhouse Gas Emissions		
11	Section 4.7	**Section 5.10 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding greenhouse gas emissions.** ***Please quantify greenhouse gas emissions reductions resulting from implementation of measures proposed in the PEA.*** Several project design features and ordinary construction/operation

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		restrictions discussed in the PEA could result in the reduction of greenhouse gas emissions. These reductions need to be quantified.
Hazards and Hazardous Materials		
12	Section 4.8.4, page 4.8-16	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding construction of TL 6965 near existing utilities.** ***Provide documentation on the depths and locations of nearby existing (and proposed if applicable) utilities in relation to the proposed location of TL 6965. Provide the analysis to support the conclusion in the PEA that there would be no significant effect on the gas pipelines (the project will not cause corrosion of the nearby pipelines or create a hazard for construction workers or the public). Quantify the potential induced current and interference in adjacent pipelines, including the two high-pressure gas lines and the two water lines.*** The subsection under TL 6965 and TL 6910 Loop-in (Section 4.8.4, page 4.8-16) addresses hazards related to construction of TL 6965 within an existing transmission corridor that also includes subsurface gas pipelines and water lines. The discussion that follows refers to a "design and engineering review" that would determine if any additional support is needed for construction equipment. It also states that pole locations, grading, and underground facilities would be designed and engineered to avoid hazards associated with the adjacent utilities. The conclusion is that impacts would be less than significant; however, there is no specific information supporting this conclusion. TL 6965 construction involves subsurface excavation for pole foundations and may interfere with existing subsurface features. Substantial evidence is needed to demonstrate that the project will not create a hazard for construction workers and the public during installation of the poles and operation of the power line. Evidence is required to determine the potential for induced current and interference in adjacent pipelines and that the project would not cause corrosion or safety hazards. Identify the distance from the power line alignment to each pipeline.
Noise		
13	Section 4.12.3.2, page 4.12-10 and	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise impacts on sensitive receptors.** ***Provide data and analysis of noise impacts on users of the Hunte Parkway Trail and any other trails in the vicinity of the substation, including the sewer access road, during construction and operation.***

Table 1: SDG&E Salt Creek Substation Project Application 13-09-014 Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
	Questions 4.12(c) and 4.12(d)	The PEA discusses the Hunte Parkway Trail as a noise-sensitive receptor. There are several other trails and pathways near the proposed substation. The impacts analysis does not, however, analyze impacts to users of the Hunte Parkway Trail or any other trails that appear to be located in the vicinity of the substation.
14	Section 4.12.4.2, Questions 4.12(c) and (d)	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise impacts on sensitive receptors.** ***Identify sensitive receptors that would be affected and identify the effects to sensitive receptors due to helicopter use. Quantify the number of sensitive receptors by type (residences, schools, parks, hospitals, etc.) located along the helicopter flight path that would be subject to noise levels in excess of City of Chula Vista and County of San Diego noise standards.*** The Project Description states that helicopters would be used during construction of the project and for aerial inspections. The PEA analyzes noise levels in the right-of-way (ROW). However, the potential for noise impacts on sensitive receptors (e.g., schools and residences) from use of helicopters during operation and maintenance is not addressed in the PEA.
Alternatives		
15	Section 5.5.2 and Table 5-3, pages 5-13 and 5-15	**Section 6.2 of the PEA Checklist and Section V(14)(b) of the Information and Criteria List regarding power line alternatives.** ***Explain why TL 6910 could not be rebuilt as a double circuit within the ROW.*** The alternatives analysis in the PEA provides a brief evaluation of alternatives considered for the 69-kV power line. It is unclear from this evaluation how rebuilding TL 6910 from Miguel Substation to Salt Creek Substation does not meet the objective of "locate[ing] proposed new power facilities, as appropriate and as needed, within existing utility rights-of-ways (ROWs), access roads, and utility-owned property." TL 6910 appears to be located within SDG&E's ROW. Provide a map showing the boundaries of the ROW. Please identify where this alternative would require acquisition of additional ROW adjacent to and west of the existing transmission corridor and where residences would be displaced by the alternative.

APPENDIX A: SPECIES FROM THE CNDDB QUADRANGLES NOT LISTED IN THE PEA

Appendix A: Species from the CNDDB Quadrangles Not Listed in the PEA	
Scientific Name	**Common Name**
Fungi	
Texosporium sancti-jacobi	woven-spored lichen
Plants	
Acmispon prostratus	Nuttall's acmispon
Ambrosia monogyra	singlewhorl burrobrush
Arctostaphylos glandulosa ssp. *crassifolia*	Del Mar manzanita
Arctostaphylos otayensis	Otay manzanita
Astragalus oocarpus	San Diego milk-vetch
Baccharis vanessae	Encinitas baccharis
Ceanothus cyaneus	Lakeside ceanothus
Ceanothus otayensis	Otay Mountain ceanothus
Ceanothus verrucosus	wart-stemmed ceanothus
Chamaesyce abramsiana	Abrams' spurge
Chloropyron maritimum ssp. *maritimum*	salt marsh bird's-beak
Clarkia delicata	delicate clarkia
Clinopodium chandleri	San Miguel savory
Comarostaphylis diversifolia ssp. *diversifolia*	summer holly
Cylindropuntia californica var. *californica*	snake cholla
Deinandra floribunda	Tecate tarplant
Dudleya attenuata ssp. *attenuata*	Orcutt's dudleya
Eriogonum evanidum	vanishing wild buckwheat
Frankenia palmeri	Palmer's frankenia
Fraxinus parryi	chaparral ash
Fremontodendron mexicanum	Mexican flannelbush
Galium proliferum	desert bedstraw
Hesperocyparis forbesii	Tecate cypress
Horkelia truncata	Ramona horkelia
Hosackia crassifolia var. *otayensis*	Otay Mountain lotus
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields
Lepechinia ganderi	Gander's pitcher sage

Appendix A: Species from the CNDDB Quadrangles Not Listed in the PEA	
Scientific Name	**Common Name**
Monardella hypoleuca ssp. *lanata*	felt-leaved monardella
Nama stenocarpum	mud nama
Navarretia fossalis	spreading navarretia
Nemacaulis denudata var. *denudata*	coast woolly-heads
Nemacaulis denudata var. *gracilis*	slender cottonheads
Nolina interrata	Dehesa nolina
Orcuttia californica	California Orcutt grass
Ornithostaphylos oppositifolia	Baja California birdbush
Packera ganderi	Gander's ragwort
Pogogyne abramsii	San Diego mesa mint
Pogogyne nudiuscula	Otay Mesa mint
Quercus cedrosensis	Cedros Island oak
Ribes canthariforme	Moreno currant
Ribes viburnifolium	Santa Catalina Island currant
Sibaropsis hammittii	Hammitt's clay-cress
Stemodia durantifolia	purple stemodia
Stylocline citroleum	oil neststraw
Suaeda esteroa	estuary seablite
Wildlife	
Invertebrates	
Branchinecta sandiegonensis	San Diego fairy shrimp
Callophrys thornei	Thorne's hairstreak
Cicindela gabbii	western tidal-flat tiger beetle
Cicindela hirticollis gravida	sandy beach tiger beetle
Cicindela latesignata latesignata	western beach tiger beetle
Cicindela senilis frosti	senile tiger beetle
Coelus globosus	globose dune beetle
Danaus plexippus	monarch butterfly
Lycaena hermes	Hermes copper butterfly
Panoquina errans	wandering (saltmarsh) skipper

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Scientific Name	**Common Name**
Streptocephalus woottoni	Riverside fairy shrimp
Tryonia imitator	mimic tryonia (California brackish water snail)
Amphibians	
Anaxyrus californicus	arroyo toad
Reptiles	
Anniella pulchra pulchra	silvery legless lizard
Aspidoscelis tigris stejnegeri	coastal whiptail
Chelonia mydas	green turtle
Diadophis punctatus similis	San Diego ringneck snake
Emys marmorata	western pond turtle
Phrynosoma blainvillii	coast horned lizard
Plestiodon skiltonianus interparietalis	Coronado Island skink
Salvadora hexalepis virgultea	coast patch-nosed snake
Birds	
Agelaius tricolor	tricolored blackbird
Aquila chrysaetos	golden eagle
Campylorhynchus brunneicapillus sandiegensis	coastal cactus wren
Charadrius alexandrinus nivosus	western snowy plover
Coccyzus americanus occidentalis	western yellow-billed cuckoo
Empidonax traillii extimus	southwestern willow flycatcher
Eremophila alpestris actia	California horned lark
Falco mexicanus	prairie falcon
Ixobrychus exilis	least bittern
Laterallus jamaicensis coturniculus	California black rail
Passerculus sandwichensis beldingi	Belding's savannah sparrow
Phalacrocorax auritus	double-crested cormorant
Rallus longirostris levipes	light-footed clapper rail
Sternula antillarum browni	California least tern
Mammals	
Antrozous pallidus	pallid bat

Appendix A: Species from the CNDDB Quadrangles Not Listed in the PEA	
Scientific Name	**Common Name**
Chaetodipus californicus femoralis	Dulzura pocket mouse
Choeronycteris mexicana	Mexican long-tongued bat
Corynorhinus townsendii	Townsend's big-eared bat
Eumops perotis californicus	western mastiff bat
Lasiurus blossevillii	western red bat
Lasiurus cinereus	hoary bat
Lasiurus xanthinus	western yellow bat
Macrotus californicus	California leaf-nosed bat
Myotis ciliolabrum	western small-footed myotis
Myotis evotis	long-eared myotis
Myotis yumanensis	Yuma myotis
Neotoma lepida intermedia	San Diego desert woodrat
Nyctinomops femorosaccus	pocketed free-tailed bat
Nyctinomops macrotis	big free-tailed bat
Perognathus longimembris pacificus	Pacific pocket mouse