Jennifer Pierce
Regulatory Case Administrator
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1530
Tel.#: (858) 654-1685
JPierce@semprautilities.com

November 25, 2013

Reg.12-10/A.13-09-014
SDG&E Salt Creek PTC

SENT VIA ELECTRONIC MAIL AND FED EX

CPUC-Energy Division
Attn: Mr. Jason Coontz
505 Van Ness Avenue
San Francisco, CA 94102

Panorama Environmental, Inc.
Attn: Laurie Hietter and Susanne Heim
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Re: A.13-09-014/Salt Creek Substation – Response to Completeness Determination Data Requests dated October 25, 2013

Dear Mr. Coontz, Ms. Hietter and Ms. Heim:

Attached please find SDG&E's response ("Response") to the following data requests dated October 25, 2013: 1) Deficiency Report and 2) Request for Additional Data. **Please note that the Response contains information considered confidential pursuant to PUC Section 583, General Order 66-C and any applicable Non-Disclosure Agreements, Federal and State Laws and Regulations**. The Response has been marked appropriately confidential and should be treated as such. A CD is being sent to each of the parties listed above and the files will also be sent via the secure CPUC FTP website and Sempra EDT website, as applicable.

If you have any questions or require additional information, please feel free to contact me.

Sincerely,

Signed

Jennifer Pierce
Regulatory Case Administrator

Enclosures

cc: Allen Trial – SDG&E
Estella De Llanos – SDG&E
Central Files - SDG&E

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

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

Please note that the items highlighted in yellow are confidential pursuant to PUC Section 583, General Order 66-C and any applicable Non-Disclosure Agreements; Confidential Non-Public Information exempted from disclosure under federal and state law

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	SDG&E Response
Project Description			
1	Section 3.5.2.1, Page 3-45; Section 4.16, Question 4.16(c), Page	**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.***	SDG&E anticipates that helicopters will be used to string sock line for conductor installation and not to transport other materials. SDG&E estimates that helicopter use will be 5 hours per day over 4 days during project construction. Refueling operations will most likely be conducted at Brown Field airport and may be conducted at the Miguel, Hunte Parkway, and

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	4.16-13	***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.	Olympic Training Center staging yards. SDG&E anticipates that helicopters may use any of the proposed staging yards as a "fly yard/incidental landing area." Illustrative approach and departure paths are included as **Attachments DR.1-1 through DR.1.-4.**
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 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.	Please see the attached Equipment Information Spreadsheet (**Attachment DR.2-1**). This information was used to prepare the air quality, GHG, noise and traffic analyses in the PEA and this response.

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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	**Attachment DR.3-1** provides a detailed explanation of the 3D modeling process, the software used, how the 3D view was generated to approximate the camera location and how the model and the baseline photograph were digitally merged to produce the final photo montage. After this summary, there is a list containing each Key Observation Point ("KOP") and specifying detailed recorded photo information, including camera make and model, film size or digital sensor dimensions, focal length used for each image, time of day the photo was taken, and whether the photo was single frame or digital stitch. Both cameras that were used include a built-in lens that was used for the photos. Therefore, the make and model of the camera is the make and model of the lens. GPS coordinates are also noted, however in some cases photos did not have GPS data, so coordinates were located based on aerial photograph and

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		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	surrounding context analysis. All available data for the horizontal and vertical azimuth is also provided. Nadir was not documented, and no survey control points were used.
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 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)	Please see attached comparison of equipment identified in the PEA project description and air quality analysis (**Attachment DR.4-1**). This comparison did identify 2 pieces of equipment (helicopter and vacuum pump) that were listed in the Project Description but were not considered in the air quality and GHG analyses. In addition, as a part of this comparison, SDG&E recognized that a generator had not been included in the project description or air quality calculations. This has been rectified with this submittal, as described in detail below and provided within the attachments. The Air Quality Appendix 4.3-A only provided maximum day calculations, in order to minimize the size of the attachment, and therefore did not show all equipment that was considered in the

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		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	analysis. Comprehensive calculation spreadsheets were provided in SDG&E's response to the Energy Division's Data Request 001 that included the comprehensive equipment listed. This comprehensive excel file has been revised and is provided as **Attachment DR.4-2** to reflect the addition of 2 pieces of equipment to the project description (street sweeper and ditch witch), and 3 pieces of equipment to the Air Quality analysis (a helicopter, vacuum pump, and generator). These additions do not affect the maximum day scenario. A helicopter may be used to string sock line for conductor installation for approximately 4 days (5 hours per day). A vacuum pump will be used during substation equipment installation for approximately 24-48 hours and has been included in the calculations. In addition, a small generator (approximately 5 hp) has been added to the sources in the Salt Creek Substation Construction (260 days, 3 hours per day), TL 6965 Foundation Installation (approximately 30 days, 3 hours per day), and TL 6910 Foundation Installation (approximately 10

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		The air quality model included the following equipment that were not listed in the Project Description: 1. Street sweeper 2. Ditch witch/trencher	days, 3 hours per day).
5	Appendix 4.3-A	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and 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 California Emissions Estimator Model (CalEEMod) is a new statewide land use project emissions model designed as a uniform platform to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with construction and operation from a variety of land uses, such as residential and commercial facilities. The Air Quality Analysis and calculations were initially conducted in December 2012, and were updated in July 2013 to address minor schedule changes. The CalEEMod Model available at the time the study was conducted had not been updated to include vehicle emission factors from the EMFAC2011 Model, nor did it include the updated load factors cited in the deficiency letter. Thus the updated model was not available at the time of the study. Because the CalEEMod Model is best suited to addressing land use planning projects such as residential and commercial facilities, it is difficult

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		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.	to fit SDG&E's construction activities within the constrained construction descriptions and phases included within the model. While it may be adequate for analyzing simple (e.g. single phase) energy projects, its limitations make it a less suitable tool for projects such as the Salt Creek Substation with its complex construction phasing. Furthermore, it is not always possible to determine from the CalEEMod Model outputs the specific contribution from individual construction sources. For these reasons, it is more appropriate and more useful to use manual calculations to calculate emissions from the project as provided in the PEA. To address the updated load factors, the calculation spreadsheets have been updated to reflect the latest load factors (**Attachment DR.5-1**). Tables 4.3-7 and 4.7-3 of the PEA have been updated accordingly and are provided in **Attachment DR.5-2.** <u>CalEEMod Limitation Examples</u> To illustrate the limitations of CalEEMod for

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			projects such as the Salt Creek Substation, several examples are provided below. 1. The model does not include a construction phase for components of the Salt Creek Project construction, such as Retaining Walls, Storm Drain and Erosion Control, Substation CMU Wall, Substation Above Grade Construction, Steel Structure Installations, OH Conductor Pulling and Tensioning, and other specific phases of construction for the Salt Creek Project. As a result, to use the CalEEMod Model, it is necessary to attempt to fit construction phases into the model's limited construction phasing, which was designed more to address land use projects such as residential developments than substation and transmission line construction. 2. It would be necessary to represent a construction phase such as Steel Structure Installations within the CalEEMod Model as "Site Preparation", "Grading", "Trenching", "Building Construction", "Paving", or "Architectural Coatings".

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			CalEEMod does not easily allow specification of certain types of vehiclesthat will be used on site. For example, SDG&E will use trucks rated for on-road use for this project, but CalEEMod models off-road trucks. Off-road trucks are not appropriate to model trucks that are certified and meet on-road standards. 3. CalEEMod also makes assumptions regarding the number of deliveries and trucks used, which must be adjusted. 4. CalEEMod appears to add in equipment that has been removed from the analysis that will not be used in the construction for the project. The CalEEMod Model does this because of the limitations of the model and its inflexibility in fitting the specific construction activities associated with constructing the Salt Creek project into CalEEMod categories that best represent land use projects. 5. CalEEMod doesn't allow the designation of trucks that would be used on site, but are not technically "offroad trucks", as

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			anything but offroad trucks. The way this has been addressed in the analysis is to use the idling emission factors from EMFAC2011 to account for the use of trucks that are certified for on-road use in the construction scenario. Offroad trucks do not have to meet the same emission standards as onroad trucks, so the CalEEMod Model calculates higher emissions for these trucks than for on-road trucks. 6. CalEEMod does not allow easily a mixture of Tier 2 and Tier 3 equipment to be specified. Rather, equipment can be either Tier 2 or Tier 3, but it is difficult to specify a mix within the constraints of the model. This project will use a mix of Tier 2 and Tier 3 equipment.
Biology			
6	Section 4.4, Tables	**Section 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding potential presence of special-status species.**	Find attached revised Tables 3-3 and 3-4 of the BTR, inclusive of those species outlined in Appendix A of your letter, and their potential to

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	4.4-3 and 4.4-4	***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 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.	occur (**Attachment DR.6-1**). Further, information within Table 3-4 has been modified for species detected in 2013 that were not previously documented on-site (i.e., red diamond rattlesnake and horned lark).
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	*Biological Resources* The alternative staging yards were surveyed for potential biological resources as a part of the overall survey effort. However, due to the fact that the staging yards were considered optional, they were not considered in the overall impact

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		Training Center alternate staging areas. These data are required to evaluate the potential impacts of staging in these locations.	analysis. A letter has been prepared to summarize the results of the field effort. This letter is provided in **Attachment DR.7-1**. *Cultural Resources* Please see Letter Report: Final Cultural Resources Survey for Proponents Environmental Assessment (PEA) for the Salt Creek Substation and Transmission Line Improvements Project in the Otay Mesa Area of Southwestern San Diego County, California (AECOM 2013). All five Olympic Training Center alternate staging areas were surveyed for cultural resources; two isolated finds, P-37-015375 and P-37-015377, have been previously recorded near Alternative OTC 3 (Kyle and Tift 1993a, 1993b). No other cultural material was observed within any of the five OTC alternative staging yards.
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***	Section 15064.5 of the CEQA Guidelines states that a project may have a significant environmental effect if it causes a substantial adverse change in the significance of a historic resource. Sites in the

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		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.	Otay Mesa area consist primarily of discrete loci with little subsurface potential combined into single resources, with little subsurface potential between the discrete and geographically distant loci and limited potential within loci themselves. Based on previous surveys investigations, testing programs, and geotechnical and potholing monitoring conducted at these sites, no substantial adverse changes to these sites are anticipated. Because no substantial adverse changes would occur related to a historical resource as defined in Section 15064.5, no impact would occur. A CMMP, including a treatment plan for inadvertent discoveries, is being developed prior to construction. This will address all potential impacts to unavoidable known resources and inadvertent discoveries within the project area including densely vegetated areas where surveys were limited by poor visibility. In addition, the CMMP will require the archaeological consultant to retain a curation agreement with the San Diego Archaeological Center (SDAC) prior to the start of construction. The impact analysis section has been revised to indicate that a CMMP, including

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		The Applicant Proposed Measures (APMs) provided in the PEA do not 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	an inadvertent discovery plan is currently being developed and will be approved prior to the start of construction (**Attachment DR.8-1**). With implementation of the CMMP, impacts to cultural resources that cannot be avoided will be reduced to less than significant. A table matrix included as Table 1 in the AECOM 2013 cultural resources technical report identifies specific project areas where cultural resource monitors would be required during construction subject to the CMMP.

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		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	

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		vegetation and low visibility (and not just within the boundaries 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.	The map of the cultural survey areas are provided in **Attachment DR.9-1** and the GIS Shapefiles of the survey area being provided via file transfer to the CPUC, and are being transmitted under title "**Attachment DR.9-2"**. Cultural Resources Survey Limits - GIS Shapefiles." Provided below is a summary of the GIS Shapefiles of the survey area. HDR surveyed the Proposed Otay Ranch Substation project Area of Potential Effect (APE) that included: - Proposed Salt Creek Substation footprint (formerly Otay Ranch Substation) - Salt Creek staging yard (formerly Otay staging yard) HDR surveyed the TL 6910 project APE that included: - TL 6910 corridor with 90-foot buffer on both sides - Pole locations

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			- Stringing sites - Access roads - Salt Creek staging yard (formerly Otay staging yard) - Miguel/Existing staging yard AECOM surveyed project-specific components of the Salt Creek Project listed below (even if the areas had been previously surveyed by HDR), as well as all portions of the Salt Creek Transmission Line Corridor and associated access roads that were not surveyed by HDR during the TL 6910 surveys. - Pole locations with 90-foot radius buffer - Work pads - Stringing sites with a 50-foot buffer - Guard structures - Miguel/Existing staging yard - Eastlake Parkway staging yard - Hunte Parkway staging yard - Five OTC staging yards - Access roads previously un-surveyed with a 10-foot buffer on both sides - New spur roads with a 10-foot buffer on both sides

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			See Attachment DR.9-1 for details.
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.	At this time we believe that all of the soils on site may be used in accordance with the recommendations of the geotechnical report. Said uses include, but are not limited to: 1. Fine grain materials may be used for non-structural fills on-site including slopes 2. On-site materials may be used to complete project grading 3. Soils with an expansion index over 50 may be blended with other granular soils and used as embankment fill or as deeper compacted fill in non-structural areas but not placed in the outer portion of fill slopes. 4. Fine grained colluvium may be placed in non-structural areas The import fill quantity presented in Section 5.6 (44,000 CY) is considered to be a worst-case scenario and was factored as such in air,

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			greenhouse gas, noise, and traffic analysis. It is worst-case scenario because the original, conservative estimate of total fill needed is likely to exceed the actual amount of fill ultimately needed. Cut soils will be evaluated for suitability as fill by the geotechnical engineer who will be on site full-time during grading operations.
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 restrictions discussed in the PEA could result in the reduction of greenhouse gas emissions. These reductions need to be quantified.	Implementation of the emission control measures were not originally part of the GHG emissions calculations. The GHG emissions have been recalculated with the incorporation of the emission control measures and Table 4.7-3 of the PEA has been updated accordingly (see **Attachment DR.5-2**).

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	***Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; PUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.***

		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 Questions 4.12(c) and 4.12(d)	**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.*** 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.	The PEA generally defines noise-sensitive receptors as residences, churches, and schools, but explains that the definition may also include others uses like passive recreation areas, on page 4.12-2 and again on page 4.12-10. Reference to passive recreation areas, including trails, in these sections was conservative because passive recreation areas are not noise-sensitive receptors under either of the applicable regulatory schemes. The County of San Diego defines a noise-sensitive receptor as locations "at which there is a reasonable degree of sensitivity to noise (such as residences, schools, hospitals, elder care facilities, libraries, cemeteries, and places of worship). The City of Chula Vista defines noise-sensitive receptors as residences, schools, churches, libraries, athletic fields, and community parks. Because neither the City nor the County defines walking trails as noise-sensitive receptors, they are not noise-sensitive receptors for the purposes of the noise analysis. In addition, the PEA noise analysis concluded that construction and operation noise would create a less than

			significant impact to the noise-sensitive receptors that are adjacent to the project corridor. Therefore, even if trails were noise-sensitive receptors, the impacts to such trails would be less than significant. Trails in the immediate vicinity of the substation (including the Hunte Parkway Trail, and Proposed Trail) would be exposed to noise from construction of the Substation. However, trail users would be exposed to noise for only a short duration of time, as they are mobile and would not be expected to remain on the trail in the vicinity of the substation for any length of time. This confirms that impacts to trail users would be less than significant, if the trails were considered a noise sensitive receptor.
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).	The existing baseline condition includes helicopters flying the transmission corridor for routine operation and maintenance inspection of the existing transmission lines. Typical annual inspections include one annual visual aerial (February-May) inspection and one infrared aerial (July-October) inspection which would place a helicopter in slow cruise flight at approximately 400'- 500' above the ground for approximately 15 minutes along the 5 mile transmission corridor. Numerous sensitive receptors are located along the transmission corridor, as noted in this question, including residents, churches, and schools. SDG&E uses best efforts to consolidate

		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.	the maintenance inspections for all facilities within the transmission corridor into a single helicopter flight. This would avoid any change in the existing baseline condition associated with operation and maintenance of the proposed transmission line, because routine inspections would be accomplished for all lines at the same time. However, if the annual inspections were not consolidated, then two additional inspection flights could occur along the transmission corridor, as described above. Existing helicopter operation and maintenance inspection activities are of a very limited duration (15 minutes along the 5-mile transmission corridor). The helicopter travels over each location for only a few seconds. Therefore the helicopters do not result in noise levels in excess of City of Chula Vista and County of San Diego noise standards. Refer to the discussion of construction noise levels for helicopter use during construction (page 4.12.13 of the PEA) for specific information on helicopter noise levels. Since noise levels for sensitive receptors along the helicopter flight path would not exceed City or County noise standards, the number of noise-sensitive receptors along the corridor need not be quantified.
Alternatives			
15	Section	**Section 6.2 of the PEA Checklist and Section V(14)(b) of the**	***Please note that this response contains***

	5.5.2 and Table 5-3, pages 5-13 and 5-15	**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.	***information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; PUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.***

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

REQUEST FOR ADDITIONAL DATA
DATA NEEDS FOR THE SALT CREEK SUBSTATION PROJECT APPLICATION (A.13-09-014)

Please note that the items highlighted in yellow are confidential pursuant to CPUC Section 583, General Order 66-C and any applicable Non-Disclosure Agreements; Confidential Non-Public Information exempted from disclosure under federal and state law.

OVERVIEW

The California Public Utilities Commission (CPUC) has identified several areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the proposed project in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

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A.13-09-014 SDG&E 11/25/13 Response
Salt Creek Substation Project PTC
Energy Division Request for Additional Data Dated October 25, 2013

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
Application			
1	Appendix E	Identify locations where the notice of filing of application was posted on-site	See attached map for locations of the 48 Notice of Filing postings on-site (**Attachment AD.1-1**).
2	Appendix H	Update the table in Appendix H to reflect all agencies and tribes contacted to discuss the proposed project. Provide records of correspondence with all agencies and tribes, including any comment letters received from the Native American Heritage Commission (NAHC) and tribes.	Appendix H includes a list of all of the agencies that SDG&E contacted and from which it requested a position statement on the project, including the NAHC. See **Attachment AD.2-2**. **Attachment AD.2-1** includes a table identifying all of the agencies and tribes contacted as part of the Native American Contact Program for the cultural resource evaluation, and the letters received from the NAHC and the Ipai Nation of Santa Ysabel. The tribes were not contacted by SDG&E as part of Appendix H to request a position statement on the project. The Native American Contact Program information (including all letters) is attached to the technical report, which was provided via confidential transmittal on October 11, 2013.
PEA Project Description			
Access Roads			
3	Figure 3-40, page 3-15	**Define access routes from alternate staging areas to work areas. Please provide GIS data for these access routes.**	See revision to PEA Figure 4.16-1 included as **Attachment AD. 3-1** that shows access to the alternate Olympic Training Center staging areas not previously shown.
4	3.3.1.3, page 3-21; Appendix 3B, page 14	**Clarify whether the unpaved road north of the substation and within the ROW corridor would be used for access to the substation site during construction. Clarify if the culvert along the unpaved road will need to be upgraded. Please provide updated GIS data if the ROW corridor south of Hunte Parkway is proposed as a secondary construction access point.**	The unpaved road northeasterly of the substation in the ROW corridor will be used as secondary access for substation site development at times in the schedule when the sewer access road (primary access) is being widened; particularly during retaining wall construction and 12kV duct package installation. Secondary access will not utilize the ROW unpaved roads or sewer access road southeasterly of the transmission project limits, or the substation parcel boundary, respectively. Secondary access to the substation site will utilize the proposed 69kV underground corridor from the unpaved ROW road to the substation site. The ROW corridor south of Hunte Parkway is not proposed as a secondary construction site access point.

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			The "culvert" was not found and is believed to be the feature circled in the picture below. At this time, we do not anticipate the need to modify any engineered feature (including drainage conveyances) in the transmission ROW corridor in order to provide secondary access to the substation site. Existing engineered features will be protected in place. 

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
5	3.3.2, page 3-29	**Confirm that access roads shown on project maps are wide enough to allow for concrete truck access, turnaround, and passing, as required to construct concrete foundations at the engineered foundation poles.**	In general, the access roads shown on the project maps are wide enough to accommodate construction vehicles. Section 3.5.2.2 of the PEA includes language describing SDG&E's annual access road maintenance program. Section 3.5.2.4 of the PEA describes the work spaces for poles and structures that do not have permanent work spaces shown in the project map book and states that: "Work areas with an approximately 10-foot radius would be established at the directly embedded galvanized steel pole structures that do not require establishment of a permanent work pad. Approximately 75-foot by 75-foot work areas would be established at each of the 10 pier foundation poles. An approximately 150-foot by 150-foot work area would be established at each of the three cable poles that would be installed east of the proposed Salt Creek Substation. . . . Furthermore, an additional area for staging and operation of vehicles and equipment may be required around the cleared work area. " SDG&E proposes to add the following paragraph at the end of Section 3.5.2.4: "The positioning of line trucks, bucket trucks, and crane trucks would involve the placement of four outriggers per vehicle with dimensions of approximately two-feet wide by three-feet long (six square feet) per outrigger for line trucks and bucket trucks, and four-feet wide by four-feet long (16 square feet) per outrigger for crane trucks. The locations of the construction vehicles would be determined by the contractors in order to allow for the work to be conducted safely. The impacts from outriggers staged outside of delineated temporary work areas would be evaluated by the on-site biological monitor prior to their placement. The monitor, as appropriate, would assist crews in outrigger placement to avoid and minimize impacts to sensitive habitat types. In addition, in order to maintain a safe working space for crewmembers working directly under all poles anticipated to be replaced, construction vehicles may need to be staged outside existing access roads and/or outside delineated temporary work areas. This may also include vehicle turn around, passing areas, disturbance for temporary power connections during construction (overhead and/or underground close to the source), temporary structures (if needed) and other similar temporary construction activities. The specific impact areas cannot be identified before construction. Accordingly, their impacts cannot be identified in the Pre-construction Survey

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			Report (PSR). However, the on-site biological monitor would assist crews in locating appropriate staging areas for construction vehicles that avoid and minimize impacts to sensitive biological resources." The following language was included in Section 3.8 of the PEA as a Standard Design Feature and Ordinary Construction/Operations Restriction. SDG&E proposes to add this language as an additional APM for Biological Resources, to be consistent with the CPUC's recent action on SDG&E's TL 637 project. **APM-BIO-2.** The Proposed Project would avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP, which is a comprehensive conservation-based approach that provides more effective species protection than project-by-project conservation planning would achieve. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The Proposed Project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal ESA Section 10(A) permit and a California ESA Section 2081 Memorandum of Understanding (for incidental take) with an Implementation Agreement with USFWS and CDFW, respectively, for the management and conservation of multiple species and their associated habitats, as established according to the federal and state ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&E's activities in the Subregional NCCP Plan Area. Pursuant to the SDG&E Subregional NCCP, SDG&E conducted pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm surveyed all Proposed Project impact areas and prepared a Pre-Activity Study Report (PSR) outlining all anticipated impacts related to the Proposed Project. The Proposed Project would include monitoring for all components, as recommended by the PSR and outlined in the

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. Prior to the commencement of construction, a verification survey of the Proposed Project disturbance areas will be conducted, as required by the SDG&E Subregional NCCP. Biological monitors will be present during construction to ensure implementation of the avoidance and minimization measures set forth in the NCCP. If the previously delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts would be included in a Post-Construction Report (PCR) to calculate the appropriate mitigation, which generally includes site enhancement or credit withdrawal from SDG&E mitigation bank credits. When construction is complete, the biological monitor will conduct a survey of the entire Proposed Project area to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank would be required to address impacts from activities related to the Proposed Project. These impact and mitigation credit calculations will be submitted to USFWS and CDFW as part of the NCCP Annual Report, pursuant to requirements of the NCCP and the NCCP Implementing Agreement. Specific operating restrictions that are incorporated into the Proposed Project design to comply with the SDG&E Subregional NCCP include the following: • Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1.). • No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (7.1.1, 2.). • Feeding of wildlife is not allowed (Section 7.1.1, 4.). • No pets are allowed within the ROW (Section 7.1.1, 5.).). • Plant or wildlife species may not be collected for pets or any other reason. (Section 7.1.1, 7). • Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8.).

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			• Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9.). • Field crews shall refer all environmental issues, including wildlife relocation, dead, or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10.). • All SDG&E personnel would participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11.). • The Environmental Surveyor shall conduct preactivity studies for all activities occurring in natural areas, and will complete a preactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13.). • The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14.). • The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25.).). • In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10 foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28.). • The Environmental Surveyor shall conduct monitoring as recommended in the preactivity study form (Section 7.1.4, 35.). • Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37, and 38.). • Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39.). • During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			7.1.6, 50). • Maintenance or construction vehicle access through shallow creeks or streams is allowed. However no filling for access purposes in waterways is allowed (Section 7.1.7, 52). • Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53.). In addition, SDG&E is proposing revisions to the APMS in the Cultural Resource Section 4.5.6 to include monitoring and assessment of any changes in work spaces during construction because the entire transmission corridor has been surveyed and assessed for cultural and paleontology resources. There revisions are included in the response to Question #73. Together, the provisions of SDG&E's NCCP, the completed resource surveys for the entire transmission corridor and the proposed revisions to the APMs in this response protect against unanticipated impacts caused by changes in work spaces during construction. Such changes, within the surveyed area, would not require Minor Project Revision review.
6	3.5.1.3, page 3-39, page 3-46	**Please identify turn around areas for access routes for all components of the project. Please also plan passing areas for roads where the roadway is not wide enough for two vehicles.** The PEA does not describe turn around areas for access routes where a workspace may be insufficient, based on the size and number of vehicles and equipment. The PEA also states that overland travel routes would be approximately 12 feet wide, which is narrow for large vehicles.	In general most access roads are not wide enough for two vehicles to pass side by side; please refer to the response above for Question #5 for addressing additional work areas through the NCCP. The map book has been updated to revise the access to the following structures: 24, 25, 28 and 29. Access to Location 24 was revised to eliminate outdated access roads. Access to this location is provided by existing public roads and the paved parking lot in which this structure would be located. At Location 25, overland travel access from an existing gate along Otay Lakes Road and a turn-around area were added. These changes occur within a disturbed Caltrans on ramp area. Turn-around areas were added for Locations 28 and 29. Both of these turn-around areas occur within existing bare ground dirt areas. An existing access road was added at location 44.
7	3.5.2.1, page 3-40.	**Please provide a map showing where the transmission line access road will be realigned around pole locations, and provide the corresponding GIS data.**	The preliminary designs and grading for the permanent work pads are provided in **Attachment AD.7-1** which identifies the location of access roads that will be realigned around pole locations. The Project map book shows the location of the permanent work pads and the realigned access roads occur within the limits of the permanent work pads. The access roads in the Project map book are based on GIS data and are not survey grade. The preliminary designs provided in **Attachment AD.7-1** are also shown on the

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			Project map book.
8	3.5.2.1, page 3-41	**Describe whether rock or other stabilization measures will be used on access roads during wet conditions.**	Construction personnel will avoid wet roads as much as possible during construction of the project. Gravel and/or rumble plates will be considered at every access road exit to a public street.
9	3.5.2.1, page 3-42	**Confirm that there is sufficient space on access roads to transport cranes to work sites and to turn cranes around. Please also describe whether tree trimming or other adjustments would be made to provide adequate clearance for cranes.**	There is sufficient space to drive cranes to work sites but not to turn them around; usual practices are to drive through or back out a crane. Refer to the response to Question #5 regarding project provisions for addressing construction activities outside of defined work spaces. Refer to question 21 for trees that have been identified for trimming at this point; conditions could change when project goes into construction and depending on the type of equipment utilized. Should the need for additional tree trimming be required SDG&E would coordinate it through our Vegetation Management group.
10	3.5.2.2 Page 3-46	**Clarify whether access road relocation and use of access roads for construction is considered "road maintenance" in SDG&E's NCCP.**	Use of (driving on) of SDGE's access roads for construction is not considered "road maintenance" in SDGE's NCCP. Road maintenance involves annual or as needed maintenance (grading and repairs) to keep the roads in good working order. The transmission access road maintenance is independent of proposed Project construction activities. Minor relocation of the existing transmission access road around the new steel poles that are proposed to be placed partially within the existing transmission access road is a covered activity under the NCCP (Section 2.1.3.1: Proposed Actions, Access Roads). The "adjusted" location of the access road will become the new transmission access road that will then be routinely maintained in the future as part of the transmission road maintenance program. Creation of this new section of road is part of, and has been analyzed as part of, the Proposed Project construction activities. The future cyclical maintenance of the road will be part of the road maintenance under SDGE's NCCP.
TL 6965			
11	3.0.2, page 3-4	**Provide GIS data and maps of the existing infrastructure in the ROW (other transmission lines and structures).**	*Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; CPUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.*

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
			Map and GIS data provided showing the proposed power line along with the existing overhead 230 kV/69 kV power lines (**Attachments AD.11-1 and AD.11-2**)
12	3.0.3, page 3-20	**Clarify whether "reconfiguring" TL 6910 as TL 6910 and 6964 involves anything other than a name change.**	After TL 6910 is looped in to Salt Creek Substation it is currently planned for the portion from Border Substation to Salt Creek to remain TL 6910 and the portion from Salt Creek to Miguel Substation to become TL 6964. Reconfiguring TL 6964 would involve re-labeling poles, maps, and relevant equipment (such as display boards in Grid Operations) accordingly.
13	3.03, page 3-20	**Provide a schematic diagram of the power line configuration.**	*Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; CPUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.* **Attachment AD.13-1** attached.
14	3.5.2.1, page 3-40, page 3-48	**Identify the stringing sites that would require grading.** The PEA states that minimal grading would be done at stringing sites. Grading is not typically done at stringing sites. Are there suitable alternative stringing sites that would not require grading?	Grading at stringing sites is not anticipated. The statement about "minimal" grading was included to provide flexibility if it is determined that minor grading is needed at a stringing site during construction.
15	3.3.1.4, page 3-22	**Clarify if the two 8-foot-high chain link gates proposed at the sewer access road entrance to the substation would prevent access to the sewer access road, or if the gates would only prevent access to the substation pad area, leaving the sewer access road open for other use.**	The two 8-foot chain link gates are the substation access gates. An existing city swing gate located at the entrance of the sewer access road will remain.
16	3.5.2.1, page 3-41	**Clarify whether any guy wire or support poles would be needed during construction or operation and maintenance of the proposed project.**	No temporary poles or guy wires are anticipated at this time.
17	3.5.2.1, page 3-42, page	**Please identify locations of guard structures for crossings of energized electric lines and communications facilities.**	SDG&E has not identified any other energized electric or communications facilities that the new power lines will pass over thus guard structures are proposed only over roadways.

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
	3-47	The PEA maps appear to show guard structures only over roadways, but do not show guard structures around any other infrastructure, such as distribution lines. The PEA states, however, that guard structures would be used at crossings of energized electric and communications facilities.	
18	3.5.2.1, page 3-42	**Please describe the circumstances where installed guard structures would be used and where bucket or boom trucks may be used for guard structures.** The PEA states that guard structures may be used or that bucket or boom trucks may be used for guard structures. There is a difference in impact between the use of installed guard structures and mobile vehicles.	The PEA assumed a worst-case analysis with all guard structures being installed in-ground. If the contractor has additional trucks to use as guard structures, they could utilize them instead of installing in-ground structures, thereby reducing ground disturbance anticipated in the PEA. Four additional guard structures have been added in the parking lots located north and south of Structure # 8 to protect vehicles in the parking lots during the installation of the conductor. These additional guard structures are identified as GS A, GS B, GS C and GS D on page 8 of the map book and would utilize vehicles instead of in-ground structures to avoid damaging the paved parking lot. Refer to **Attachment AD.11-1** (confidential map book) or **Attachment AD.18-1** (public map book). **Attachment AD.18-2** includes the shape files for the public map book revisions that include: • Turnarounds – request #6 • Proposed 12 kV Getaway Route – not sure if this is a specific request but it wasn't in the original map books • Access roads – general updates + request #43 • Guard Structures – Added 5 (A through E) • Navigational Roads – Requests #3 and #42 • Trails – not included in original map books – may help answer Request #81
19	3.5.2.1, page 3-42	**Please clarify if a "pull site" is the same as a "stringing site."**	Yes –these terms are used interchangeably.
20	3.5.2.2, page 3-	**Provide additional details on the location(s) of drainage crossings and how drainage crossings would be constructed to avoid impacts to state**	At this time, it is not anticipated that the use of temporary bridging of drainage crossing locations along access roads would be required. This language was included to provide flexibility should conditions change prior to construction in the event of extensive rainfall.

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
	46.	**and federal jurisdictional waters.** The project description states that drainage crossings may be used wherever feasible or necessary.	
21	3.6.4	**Identify the locations of trees that are proposed for removal as a part of the project. Confirm that no tree trimming is required for the new power line.**	SDG&E evaluated the TL 6965 route from Hunte Parkway in Chula Vista to the substation just north of Mt San Miguel Park and at this time it appears that there would be very few tree conflicts. One location where SDG&E may have a construction conflict is near the tennis courts just south of Pole ID Z100640 requiring SDG&E to prune 2 to 3 trees during the construction phase. Just north of the tennis courts there are two fan palms near TL23040 Tower ID Z283973 that SDG&E likely will need to remove. Just north of that tower SDG&E may need to prune an additional 2 to 4 willow trees with the new TL in the future. Lastly, just north of Tower ID Z283970, SDG&E may need to prune 2 pine trees and 2 palm trees located in back yards. Well into the future, SDG&E may need to prune the California pepper trees just north of Olympic Parkway. All of this is based on today's conditions, so when construction begins, this list could change if conditions have changed. Note that the pole numbers referenced above correspond to those shown in the confidential map book (**Attachment AD.11-1**) with the exception of the "Z" in front of the number.

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
Disturbance Areas			
22	3.3.1.5, page 3-22	**Provide a figure and GIS data for the temporary work space that may be needed around the two adjacent duct trenches during construction. Please also identify the concrete truck workspace and washout area.**	Attachment (**Attachments AD.22-1** and **AD.22-2**) includes sketches that provide the typical dimensions and general arrangement for a backhoe, dump truck and concrete truck relative to the typical distribution trench. As indicated on the sketch the washout will be done over the trenches. GIS data is not available as these are conceptual sketches at this time since trench locations in franchise have not been finalized.

Table 1: Application No. 13-09-014 Data Needs			
#	PEA Section, Page #	Data Need	SDG&E Response
23	3.3.1.5, page 3-23	**Confirm that manhole racking, terminations, and approximately 1,400 feet of copper cable from the substation to Hunte Parkway have been accounted for in the disturbed areas for the distribution circuits shown in Appendix 3-B.**	Manhole racking, terminations, and the approx. 1400 feet of copper cable will be located in the distribution manholes installed in Hunte Parkway and have not been accounted for in the disturbed areas because this will all occur in franchise. Furthermore locations of these new manholes will not be finalized until a later time since they could change based on future development in the area.
24	Section 3.5, Table 3-2	**Please describe the methodology used to calculate temporary and permanent disturbance areas, including any buffer areas added to work areas and trenched areas**.	For substation site development as well as grading and access road improvement permanent associated with the substation, disturbance areas were generally increased by 25 feet to define temporary disturbance limits. Temporary disturbance areas outside of permanent disturbance extents are needed for equipment access around the grading or improvements. At locations where temporary disturbance areas were near parcel or easement boundaries, the parcel or easement boundary was selected as the temporary disturbance limit. For the power line pole construction/maintenance pads, between five and ten feet was added beyond the extent of the permanent grading depending on the height of the cut or fill slope. If the site was bounded by some limitation such as a property line, sensitive areas, or drainage area, etc. then the temporary disturbance area was increased. Such temporary area is used for equipment access around the grading improvements or for temporary stock piling. Temporary impacts for poles with work pads generally occur 5' – 10' beyond the permanent grading extent. If the site was bounded by some limitation (property line, sensitive areas, drainage area, etc.) then the temporary disturbance area was shifted to the unrestricted side. This temporary area is used for equipment access around the grading improvements or for temporary stock piling. For poles without permanent work pads, poles would be brushed to a radius of 10 feet from the base of the pole (314 square feet). Permanent impacts will result from the loss of area on the ground due to new pole placement. Temporary impacts associated with pole removal and replacement activities will result from excavation of the replacement pole holes, placement of the excavated soil, and impacts caused by crews accessing and walking in the areas around the poles. Permanent and temporary impacts for poles without work pads would occur within the footprint of the pole brushing permanent impact. Additional impacts may occur at all structures where footpaths or vehicle paths are required. Impacts associated with

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			footpath and vehicle access are considered temporary and are calculated based on the size of the area required for construction. Impacts associated with work pads, guard structures, and stringing sites are calculated based on the size of the area required for construction. No impacts were included for the Existing Staging Yard as it is entirely within bare ground. Additionally, impacts were not included for the Hunte Parkway Staging Yard because it was mitigated for previously under a separate project.
25	3.5, Table 3-2 and 3-3	**Clarify the permanent disturbance at the Eastlake Parkway Staging Area.** The PEA lists the permanent disturbance of the Eastlake Parkway Staging Yard as 0 acres. Table 3-3 says there will be earthwork at the staging area.	The potential for grading at the Eastlake Parkway Staging Area was included in the PEA to provide flexibility and the ability to utilize the portion closer to SR-125 which is not flat. The Eastlake Parkway Staging Area impacts were characterized as temporary, because the use is temporary and only minimal grading (or smoothing out) may potentially be performed. This minimal grading is not expected to result in a substantial change in the condition of the land. Furthermore, SDG&E can return the site to approximate pre-project conditions, post-construction.
26	3.5.1.1, Page 3-35, Page 3-41	**Identify potential sources for class 2 aggregate and the distance to those sources.**	The primary source for Class 2 aggregate base material will be Vulcan Materials Co., 2041 Heritage Road, Chula Vista, CA 91910. One-way distance to the substation site is approximately 6 miles. A secondary source may be used depending on quality and cleanness of recycled materials available at the time of construction: Reclaimed Aggregates, 855 Energy Way, Chula Vista, CA 91911. One-way distance to the substation site is approximately 8.5 miles.
27	3.5.1.5, page 3-40	**Confirm that proposed landscaping and irrigation areas have been included in surface disturbance calculations, or please update the disturbance area calculations and GIS to reflect the landscaping and irrigation.**	The proposed landscaping and irrigation areas are included in the surface disturbance calculations. Approximately 4.7 acres of the total 10-acre surface disturbance area of the Salt Creek substation site would have landscaping and irrigation.
Substation			
28	3.5.1.1, page 3-	**Please clarify whether SDG&E or AT&T would install the telephone line to connect the substation to**	SDG&E will install the conduit to the nearest AT&T service facility with the available telecom circuit. AT&T will pull the telecom circuit into Salt Creek Substation.

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	38.	**AT&T's existing facilities on Hunte Parkway.**	
29	3.5.1.3, page 3-39	**Describe whether water from the proposed sewer access road drainage improvements would drain only into the detention basin, or if there will be additional outlets to natural drainages.**	Where improvements to the access road increase discharge due to impervious surface increase, the resultant quantity of storm water discharge will be conveyed to the water quality basin. Portions of the existing conveyances associated with the existing access road adjacent to the substation site development will be allowed to continue their conveyance function without any increase in storm water discharge.
30	3.5.4.1, page 3-49	**Identify the height of the masonry perimeter wall around the substation.**	Minimum height of the masonry screen wall will be 10 feet as measured from grade outside the wall. At this time, maximum height of the masonry screen wall is anticipated to be 12 feet.
General			
31	3.5.1.3, page 3-40	**Provide the official name for the "public improvement permit" that would be needed for the curb, gutter and driveway improvements at Hunte Parkway (e.g., "Principal Construction Permit").**	The City of Chula Vista Department of Development Services has previously indicated to SDG&E that the minor improvement plans for curb, gutter and driveway enhancement along Hunte Parkway should be submitted, reviewed, and ultimately approved as part of a Grading Permit. As part of the Grading Permit review and approval process, the City may also require ancillary permits including but not limited to a Driveway Permit, Encroachment Permit, and Traffic Control Permit for work impacting or near Hunte Parkway ROW. All ministerial permits required by the City will be obtained prior to construction.
32	3.5.1.5, page 3-40	**Describe the water supply method for operation and maintenance of the project (e.g., importation by truck or new water line). If new water lines are proposed, describe the approximate distance (linear feet) and location for those lines.** Water importation should be accounted for in the truck trip assumptions and air quality emissions estimates for the project.	For substation site grading and site development construction, water supply will come from local fire hydrants on Hunte Parkway. Temporary meter(s) will be used on fire hydrant(s) closest to the project site. Water trucks typically sized from 2,000 to 4,000 gallons will be utilized for water distribution on site. These water trucks are part of the Air Quality Modeling estimates.
33	3.5.2.1, page 3-41	**Describe how plywood would be adequately secured to prevent animals or people from becoming entrapped in excavations, or devise an**	SDG&E utilizes plywood boards and plastic covering to cover the excavated holes until pole installation activities begin. Plywood boards are placed over the hole, with plastic sheeting placed over the plywood including excess plastic around the edges. Sand bags

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		alternate way (e.g., steel plates with packed soil around the edges) to secure excavations. Plywood is often easily warped and not well secured, such that animals or people may become entrapped in the excavation. Identify special precautions for these excavations, such as packing soil around gaps on the edge of the plating, to prevent human and animal entrapment in trenches.	or gravel bags are then placed on the plastic to secure/seal any gaps to prevent human and/or animal entrapment in the holes.
34	3.6.4.1, page 3-63	**Provide a list of the 16 approved herbicides that may be used on the project.**	SDG&E has reviewed the herbicide list originally referred to in Section 3.6.4.1 in the PEA and updated the list to reflect the most current information available to SDG&E on herbicides in use. The following list of herbicides in use is subject to change based on updates to the information available to SDG&E. SDG&E evaluates herbicides for use based on potential effects to wildlife and vegetation communities. SDG&E will select herbicides as needed for a specific site to facilitate use of active ingredients with the lowest risk for negative effects on any sensitive species potentially present at the site. **Herbicides:** Garlon 4 Ultra Dupont Landmark XP Dow AgroSciences Milestone VM Herbicide Portfolio 4F CA Rodeo Herbicide Roundup Weed and Grass Killer1 SPRAKIL SK26 Granular Weed Killer **Surfactants Only:** In-Place SYL-TAC

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35	3.0.3, page 3-19	**Provide a map showing the Border Substation in relation to the project.**	*Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; CPUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations* See **Attachment AD.35-1** for a map showing the following substations – Border, Proctor Valley, Telegraph Canyon, and Salt Creek.
36	GIS	**Provide all components for the following shape files:** • **BiologicalStudyArea_2013.shp** • **Municipal.shp** • **Olympic_Proposed_Staging_Site.shp** These three shape files were transmitted on October 11 and have missing elements. We received three elements, but do not have all of the components to create the shape file.	GIS Shapefiles are provided via file transfer to the CPUC as part of **Attachment AD.59-1** under title "Biological Report GIS Data."
Minimization Measures			
37	3.8, page 3-65	**The PEA states that all unpaved areas would be wetted at least three times daily. The measure, as written, does not allow for ceasing such activities if they are unnecessary to control dust. Please revise the measure to state the wind speed at which water will be applied and that water should be applied when traffic results in a visible dust plume.**	SDG&E's proposed measure to wet unpaved areas that are not otherwise sufficiently or permanently stabilized to prevent visible dust on a regular cycle of 3 times a day is something that is both practical and proactive. This measure will enable the unpaved areas to remain moist on a constant basis and abate dust plumes from kicking up during construction activities and/or high wind conditions. This will ensure continued compliance with the visible dust standards of San Diego APCD's Fugitive Dust Rule 55 and eliminate any guessing on when water should be applied. The construction activities and volume of traffic on unpaved roads can vary from hour to hour and it is not practical to precisely time when water should be applied. During obvious situation such as rainy conditions, crews will not be applying water to the site. Furthermore, SDG&E is also proposing to cease earth moving and construction activities during excessively windy periods which create dust plumes (such as when sustained wind speeds exceed approximately 25 mph).
Appendix 3B: Detailed Route Maps			

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38	All maps	**Please define what the various types of shading represent (e.g., solid yellow, solid red, striped yellow).**	The map books (**Attachments AD.11-1** and **AD.18-1**) have been revised to include a legend of the various types of shading.
39	All maps	**Please confirm that it is feasible to use the stringing sites as shown on the map or update the GIS data to show larger and/or realigned stringing sites. Some stringing sites seem smaller than needed, and some stringing sites are not aligned with the transmission line. Confirm the location of the stringing site.**	It is feasible to use the stringing sites as shown on the map. Stringing sites are of sufficient size and located as proposed in our application. Refer to the response to Question #5 regarding project provisions for addressing construction activities outside of defined work spaces.
40	All maps	**Please define access roads to each work area/pole site. Some of the access roads fall short of reaching their destinations (see, for example, page 5 and page 10). Please provide updated GIS that addresses these errors.**	The map book was updated to revise the access to the following structures: 24, 25, 28 and 29. The updated Project map book is included in Attachment AD.6-1 and the GIS data is provided in Attachment AD.6-2.
41	page 1	**Please address whether any temporary workspace is needed for work at the Miguel Substation or associated existing or proposed access routes.**	No additional temporary workspace is needed other than already identified for work at Miguel Substation or associated access routes.
42	page 2, page 3	**Identify access routes that may be used to bypass a bridge that is down.** There appears to be a downed bridge approximately 100 feet northwest of location 35 on page 3, leaving access to that location only from the south and a lack of access between Mount Miguel Road and work areas near the Miguel Substation.	Traversing between locations 35 and 36 can be accomplished two ways: 1. Via the access road that ends in the cul-de-sac located at the west end of Corte Anacapa (refer to pg 2 and 3 of **Attachment AD.18-1**) 2. Via access roads around Miguel Substation (refer to fig. 4.16-1)
43	page 8	**The access road on page 8 traverses parking lots. Please confirm that this is correct or please provide updated GIS data that shows the accurate access route.**	The access road previously shown on page 8 through the parking lot has been eliminated. Access to Structures 24 and 23 (page 7) would be via the existing circulation options available to motorists in these existing paved parking lots. The Map Book and GIS data have been updated to reflect this change.

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44	page 8	**Identify the number of parking spaces that would be temporarily or permanently impacted by the workspace and foundation pole at location 24.**	Approximately 14 parking spaces would be temporarily impacted during the construction of the foundation pole at location 24. Approximately three parking spaces would be eliminated due to the installation of this foundation pole.
45	page 14	**Confirm that no additional work areas are required to upgrade the sewer access road.** The temporary work space around the sewer access road seems small given the amount of expansion and slope work that would be done.	Temporary disturbance areas around the sewer access road are adequate for the type of construction work planned.
46	page 15	**Please show where the 8-acre disturbance area would be located within the Hunte Parkway staging area. Show ingress/egress access road locations.** The PEA states in Section 3.5, Table 3-2, that the work area within the Hunte Parkway staging area would be 8 acres. The map shows the entire parcel as being disturbed.	**Attachment AD.46-1** shows the proposed portion of the parcel owned by the Sweetwater School District for the anticipated staging yard. The figure also proposes the ingress and egress location to the site. Subsequent of the submittal of the PEA, the District has proposed approximately 6.5 acres for the staging yard. This could change depending on progress of the school construction at the time that Salt Creek construction begins.
Aesthetics			
47	Figure 4.1-27	**Identify the timing portrayed in the visual simulation at Key View 7.** The Aesthetics Section of the PEA includes a detailed and extensive Landscape Concept Plan (Figures 4.2-1 and 4.1-2). The substation and its Landscape Concept plan are graphically illustrated in the proposed project simulations in Key Views 7, 9, 10, and 11. The trees and understory appears large and mature in Key View 7 After (Figure 4.1-27). Does this representation show the vegetative screening immediately after implementation with large specimens, or does it demonstrate the conditions years after successful propagation of less mature landscape specimens?	Key View 7 represents what the proposed landscape may look like in 10-15 years. Based on SDG&E's experience with the proposed plants, the size of the tree when planted, sun exposure and soil type, SDG&E estimated what the particular trees may look like in the future.

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48	4.1	**Describe the proposed treatment of steel poles to reduce glare.** Glare from galvanized steel is a common problem for new substations and transmission line towers that do not require steel suppliers to apply chemical post treatment to the steel that substantially reduces the surfaces reflexivity. On the SDG&E site visit the wood to steel poles were observed and they appeared to be non-specular. Will the poles for TL 6965 be treated similarly? Will the steel used at the substations also receive post treatment so they will not cause glare?	Engineered poles (poles requiring foundations) will be dull galvanized to reduce glare compared to typical galvanized coatings. Direct bury poles will either be dull galvanized or weathered steel. Galvanized substation steel is not currently planned to undergo a secondary process to be immediately have a dull finish; over time it has a tendency to become dull naturally.
49	4.1, Figures 4.1-17 through 4.1-32	**Provide high resolution images for all key observation points.** The images from the "key views" presented in the PEA have been down sampled so severely that when one attempts to zoom-in to see details, the images are very pixilated. Please provide high resolution images of both the baseline and proposed conditions for all key observation points.	High resolution images for all key observation points (KOPs) are provided in **Attachment AD.49-1**.
50	Appendix 4.1-A	**Describe the rationale used to define viewer sensitivity ratings.** Appendix 4.1-A, the Aesthetic Technical Analysis uses a modified FHWA methodology to assess visual change. The addition of a third transmission line into the ROW will noticeably reduce the amount of open space in the ROW and add additional visual clutter to the Key Views that were identified. This clutter is directly related to two of FHWA criteria: intactness and unity. In the numerical rating portion of the analysis the intactness number typically drops by only 0.5 points with project	The existing foreground view from most of the view points along the corridor and proposed substation is largely developed. The distant background views to the south are considered much more natural. However, because of the development adjacent to the corridor, the vividness factors are considered quite low as the views are fairly developed. Because the corridor itself contains a considerable amount of vertical elements (the poles and towers) and elements above the landscape (wires), the intactness of the views are also fairly low. As such, the addition of the additional towers and wires will affect the existing intactness slightly (usually about 0.5 lower) due to the penetration of the background and middle ground views by the proposed towers, poles and wires. However, the overall character and unity of the view will not change as the existing view already includes towers, poles and wires. The additional towers, poles and wire will not affect the unity as users will not perceive a difference.

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		implementation, whereas the unity scores often do not change. Please explain your rationale for this key quantitative portion of the analysis. There are also numerous vantage points (key views) along the City designated scenic routes. Please explain your rationale for giving these points a viewer sensitivity of 1.0 (low viewer sensitivity).	
51	Figure 3-6	**Add labels and other details to Figure 3-6.** The Preliminary Grading and Drainage Plan (Figure 3-6) is difficult to read and interpret due to the absence of labels. Please update the map to include: a) Labels for the topographic lines and existing and proposed contour intervals. b) The elevations of the tops and the toes of the slopes including the soil nail wall c) A label for the assumed brow ditch (8 foot wide flat area near mid slope in the proposed fill slopes). d) Label for the heavy line on the upslope side of the brow ditch (Is this a retaining wall?) e) Correct the graphic scale provided on the figure; it should match the distance callouts on the plan.	See attached revision to fig. 3-6 (**Attachment AD.51-1).**
52	4.1	**Provide a simulation of the substation retaining walls and masonry walls.** There are no Key Views presented where the retaining wall(s) or masonry walls at the Salt Creek Substation are readily visible. Please provide representative photograph examples of the	SDG&E requested clarification from the CPUC on the location of the additional simulation. A response was received on 11/13/2013. The simulation is in the process of being generated and will be provided to the CPUC on December 4, 2013.

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		alternative walls.	
Air Quality and Greenhouse Gases			
53	4.3, page 4.3-5	**Update the air quality impact analysis to reflect the SCAQMD Air Quality Significance Thresholds. Define any measures that would be implemented during construction to reduce emissions below the SCAQMD thresholds.** The SDAPCD (Rice 2013) stated that SDAPCD follows the SCAQMD CEQA guidelines because SDAPCD has not developed their own CEQA guidelines. The SCAQMD CEQA thresholds for construction emissions differ from the SDAPCD stationary source regulations that were used as the basis for analysis in the PEA. The SCAQMD construction emissions thresholds are more stringent for emissions of NOx and SOx than the SDAPCD stationary source regulations.	SDG&E disagrees that the analysis should be updated to use the SCAQMD Air Quality Significance Thresholds. The project is within the San Diego Air Basin (SDAB), and is not located within the South Coast Air Basin. While the SDAPCD may have expressed an opinion regarding significance thresholds, they do not serve as a CEQA lead agency for projects within the SDAB, nor do they regularly provide comments or review of CEQA documents. Other agencies within the SDAB, including the County of San Diego Department of Planning and Land Use and the City of San Diego, which do serve as lead Aaencies, use the thresholds that are based on Rules 20.2 and 20.3 as presented in the Air Quality Analysis. The SCAQMD's Air Quality Significance Thresholds are based on the nonattainment status of the South Coast Air Basin, and are established at 55 lbs/day for NOx and VOCs for operations. These thresholds reflect the classification of the South Coast Air Basin as an extreme ozone nonattainment area with a major source threshold of 10 tons per year. 55 lbs/day is derived by dividing 10 tons per year by 365 days per year. In contrast, the SDAB is currently classified as a marginal nonattainment area for the 8-hour O3 standard. It is therefore appropriate to use the thresholds from SDAPCD Rules 20.2 and 20.3 that were identified in the Air Quality Analysis, as these thresholds reflect the air quality within the SDAB. As stated in the Air Quality Analysis, for conservative purposes the SCAQMD's threshold for VOCs of 75 lbs/day was used because Rules 20.2 and 20.3 do not include a VOC threshold. Therefore, substantial evidence supports the decision to use these thresholds. Furthermore, Rob Reider of the SDAPCD has confirmed (refer to **Attachment AD.53-1**)that the thresholds used in the section are appropriate for the San Diego Air Basin, as these thresholds are used by multiple lead agencies, including the County of San Diego Department of Planning and Development Services. Accordingly, they are appropriate for the Salt Creek Project.

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54	Appendix 4.3, page 4.3.A-1.	**Please provide support for the assumption that 30 percent of heavy construction equipment will be Tier 3 equipment and 70 percent of construction equipment will be Tier 2 equipment.**	The construction contract will include a provision that requires the contractor to verify that 30 percent of heavy construction equipment will be Tier 3 equipment and 70 percent will be Tier 2 equipment.
55	Appendix 4.3, page 4.3.A-2	**Please provide the emissions calculation tables A-30 to A-375 that are referenced in the PEA.** The methodology references tables up to A-375. Appendix 4.3-B provides up to Table A-30.	Tables A-30 through A-375 were provided to the CPUC on October 11, 2013. As noted in Deficiency Report Response No. 4, these spreadsheets have been further updated and are provided as an excel file via file transfer to the CPUC (see Attachment DR.4-2), and are being transmitted under title "Attachment DR.4-2. Week-by-Week Maximum Construction Emissions."
56	Appendix 4.3 pages B-26 and B-32	**Please identify the mitigation that has been factored into emissions calculations listed in tables A-25 and A-30.** It is unclear which mitigation is considered for the emissions listed in Tables A-25 and A-30 (i.e., APMs only, project design features and ordinary construction/operations restrictions only, or APMs and project design features and ordinary construction/operations restrictions).	All of the APMs, project design features, and construction/operational restrictions identified in the PEA will be implemented during construction. Not all of these measures have quantifiable emission reductions associated with them. Given the difficulty of quantifying emission reductions, the emissions calculation tables took the conservative approach of not reducing estimated emissions to account for APMs, project design features, and construction/operational restrictions, with the exception of watering three times daily. This would have the quantifiable effect of increasing the moisture content of the material on site to 15% from 2% in the emission calculations for earthmoving.
Biological Resources			
Botany			
57	Appendix 4.4-A, Appendix C, page 5	**Provide the Vegetation Enhancement Program to mitigate for impacts to grasslands.** Page 5 of Attachment 4.4-A, Appendix C states: "If the project elects to use the NCCP for mitigation, it is recommended that the NCCP Enhancement Program also be used to mitigated impacts to grasslands." If SDG&E elects to use the NCCP Enhancement Program to mitigate for impacts to grasslands, a Vegetation Enhancement Plan will need to be submitted to CPUC to document where	SDG&E's Enhancement and Monitoring Program (Program) is another means of mitigating temporary impacts of native habitat (as listed in the NCCP on page 41). Section 7.2 Habitat Enhancement Measures within the NCCP describes this form of mitigation. Enhancement involves either restoration or reclamation of habitat that has been temporarily impacted by project-related activities. For the proposed Salt Creek Substation Project (Proposed Project), SDG&E has chosen to utilize the Enhancement and Monitoring Program for temporary impacts to grassland habitat. SDG&E will implement natural recruitment for these temporary impacts. All impacts to grassland habitat for the proposed Project are within non-native grassland. Native grassland habitat was only observed in the within the 500-foot-buffer of the Biological Survey Area (BSA) and no work or associated

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		grasslands will be enhanced/mitigated on-site and the methods that will be used to enhance grassland habitats.	impacts in this buffer area is planned for the proposed Project. (See BTR Figure 3-1a-c: Vegetation Communities and Cover Types within Biological Study Area). A site has recovered or met success criteria when the site closely resembles the nearby reference site in cover (Section 7.2.1 of the NCCP). All sites selected for enhancement or recovery through natural recruitment are monitored during the growing season (beginning in June) to determine if the site has recovered. Once a site has met the success criteria, it is removed from being monitored. If a site does not meet success criteria during its first year in the Program (Year 1), enhancement and monitoring may be considered for an additional year. If a site does not meet success criteria after 2 years, the credits at a 1:1 ratio are typically withdrawn from the mitigation bank. If a site shows a potential for meeting success criteria, SDG&E may decide to monitor the site for an additional year. SDG&E submits the results of the Enhancement Program on an annual basis to the appropriate agencies for review. Temporary impacts to non-native grassland for proposed Project activities may be the result of overland travel by equipment or they may be areas where the ground is actually disturbed for pole and work area placement. As part of the Stormwater Pollution Prevention Plan (SWPPP) that will be implemented for the Proposed Project, soil stabilization is required for temporary impacts that result in exposed soils, such as the proposed work pad cut slopes. For areas of temporary disturbance where soil stabilization is required, the SWPPP will use a native coastal sage scrub (CSS) mix in concert with a bio matrix mulch to stabilize these areas. The Enhancement Program will work in concert with the proposed Project SWPPP. The Enhancement Program will monitor the temporarily disturbed areas, as described above, for either the establishment of CSS or the passive recruitment of grassland. Although the Enhancement Program will not take the responsibility for the success of CSS at these locations, at the end of three years of monitoring (as described above), if the sites have not met success criteria (unsuccessful non-native grassland re-establishment or has not re-established with CSS to the success requirements of the SWPPP, SDG&E will mitigate 1:1 for temporary impacts to non-native grassland by withdrawing from the SDG&E mitigation bank. The SWPPP may choose to re-seed with CSS mix during this time frame or beyond this time frame in order to meet the Plan's requirements for SWPPP close out. Areas of temporary disturbance that do not require soil stabilization associated with the SWPPP, such as overland travel that did not result in exposed soils, the temporarily disturbed areas will be monitored through the Enhancement Program for natural recruitment. The Enhancement Program's goal in this effort is to either re-establish non-native grassland to the success criteria in Section 7.2.1 of

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			the NCCP, or attain the establishment of native CSS at these sites. SDG&E will use the NCCP for vegetation enhancement in lieu of a separate plan.
58	4.4	**Identify herbicides that may be applied within the project area, and other methods that may be used to control invasive and noxious weeds during and following construction of the project. Include MSDS sheets for the herbicides.**	Refer to the response to question 34 for the list of herbicides to be used. The MSDS sheets are included in **Attachment AD.58-1**. Additionally ground level removal methods are utilized (such as line trimmers or mowing type machinery).
59	4.4	**Provide GIS data for all biological surveys including vegetation mapping, rare plant surveys, wetland surveys, and focused special-status species surveys.**	GIS data, organized by report, is provided via file transfer to the CPUC, and are being transmitted under title "**Attachment AD.59-1**– Biological Report GIS Data."
60	4.1, page 4.1-5	**Provide a list of seeds and plants that may be used on the project, including landscape plantings.**	For the Salt Creek Substation, please see the attached Landscape Plan sheets 1 and 2 (**Attachment AD.60-1**). For any temporary impacts within the transmission corridor, SDG&E would enhance the areas, per the NCCP, relying on the attached seed mix(es)(**Attachment AD.60-2**)
61	Appendix 4.4-A, Appendix C, page 2	**Provide a copy of the SDG&E proved pole matrix, dated April 3, 2012. This document is referenced on Page 2 of Attachment 4.4-A, Appendix C.**	The impact estimates and pole information in the letter dated April 3, 2012, is no longer the most current. Please see the PEA section and BTR for the most current information. For reference, however, the pole matrix dated April 3, 2012, is in **Attachment AD.61-1**
Wetlands			
62	4.4, pages 4.4-22 and 4.4-33	**Provide additional supporting documentation to define the limits of federal and state jurisdictional waters.** Wetland and riparian areas are inconsistently calculated in the PEA. Table 4.4-1 identifies 2.24 acres of riparian and wetland vegetation	The wetland and riparian acreages were inconsistently calculated between Tables 4.4-1 and 4.4-2. The inconsistencies were caused by an error during GIS calculations and the incorrect coding of a polygon (the area northwest of the junction of Otay Lakes Road and SR-125). This area consists of "ornamental" vegetation community, but was incorrectly coded as "southern willow scrub." The tables, appropriate PEA Section text, and Figure 4.4-1 have been revised and are provided in Attachment AD.62-1.

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		communities in the Salt Creek Substation and transmission corridor. Table 4.4-2 identifies 0.805 acre of potentially jurisdictional waters within the Substation and transmission corridor (a reduction of 1.39 acres). Please explain the differences in wetland acreages. The reduced area of potentially jurisdictional waters was defined during a reconnaissance-level survey conducted by AECOM on March 21, 2012. A single day of field work is inadequate to delineate wetlands and riparian areas in the entire transmission corridor in a manner consistent with agency guidance manuals. A detailed wetland delineation, or U.S. Army Corps of Engineers (Corps) and CDFW verification of the previous delineations, is required to define the limits of waters of the U.S. and waters of the State.	A detailed wetland delineation is unnecessary because the Proposed Project will avoid all jurisdiction waters. The survey on March 21, 2012 was not a formal wetland delineation and was intended to map the maximum extent of the jurisdictional waters, with the intent to avoid impacts to the extent practicable. As per your request, SDG&E has nonetheless contracted to conduct a formal wetland delineation and complete a formal delineation report for the transmission corridor and Substation property. This delineation report will be provided to the CPUC by December 6, 2013. Following completion of this delineation, acreage and figures may need to be further revised to reflect the delineation results. The survey on March 21, 2012 was not a formal wetland delineation and was intended to map the maximum extent of the jurisdictional waters, with the intent to avoid impacts to the extent practicable. As per your request, SDG&E has contracted with AECOM to conduct a formal wetland delineation and complete a formal delineation report for the transmission corridor and Substation property. This delineation report will be provided to the CPUC by December 4, 2013.
63		**Obtain state and federal concurrence with the non-jurisdictional determination for concrete ditches within the substation property.** Corps and CDFW verification is required to determine jurisdiction over the concrete ditches located on the Salt Creek Substation property. The consultant recommendation that the concrete ditches are not jurisdictional must be substantiated by a letter from the Corps and CDFW. Alternatively, SDG&E may assume that these areas are subject to Clean Water Act jurisdiction under Regulatory Guidance Letter 08-02. SDG&E may then apply for state and federal permits to fill these resources.	Although SDG&E does not believe that concurrence is necessary, the January 2013 Aquatic Features Summary for the Salt Creek Substation was provided to both the CDFW and USACE to obtain their concurrence that the concrete ditches are not jurisdictional under CDFW Code and Section 404 of the Clean Water Act. Confirmation from these agencies was provided via e-mails included in **Attachment AD.63-1**.
64	4.4, page 4.4-100	**Provide additional evidence to support the conclusion of no effect to wetlands or riparian areas.**	The statement in the PEA on page 4.4-100 is incorrect. It should have stated "Potential ground-disturbing activities associated with installation of the transmission line are located away from potential jurisdictional waters and wetlands, and no structures or string sites

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		The PEA states, "The Transmission Corridor and potential ground-disturbing activities are located away from potential jurisdictional waters and wetlands, and no structures or string sites would be placed within jurisdictional waters or wetlands." This statement is inconsistent with the wetland delineation reports and findings in the PEA that there are potentially jurisdictional waters located within the Transmission Corridor and Substation. The wetland and riparian area map set in the BRTR does not include the locations of poles, access roads, or other work areas.	would be placed within jurisdictional waters or wetlands." The formal wetland delineation will include a map with locations of poles, access roads, or other work areas, to support the conclusion that no jurisdictional waters would be impacted during construction of the transmission line.
Wildlife			
65	Appendix 4.4-A	**Provide records of all correspondence with USFWS and CDFW. The following correspondence is required at a minimum:** **a) Email between Erin McCarthy and Alison Anderson dated March 16, 2011 and approving the modified Quino checkerspot butterfly (QCB) protocol** **b) Any correspondence with USFWS and/or CDFW regarding the 2011, 2012, and 2013 QCB survey results or any comments on the survey reports.** **c) Correspondence with USFWS and/or CDFW regarding the 2011 and 2012 coastal California gnatcatcher (CAGN) survey results and methods, and any comments on the survey reports. Provide records of notification submitted to USFWS in accordance with the survey guidelines for CAGN, specifically, "The permittee shall notify the appropriate Service Fish and**	The information requested in (a) through (d) are provided in **Attachment AD.65-1**. The correct date for the email in (a) is March 15, 2011.

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		Wildlife Office in writing, at least ten (10) working days prior to the anticipated start date of survey work and receive approval prior to beginning work." **d) Correspondence with USFWS and/or CDFW regarding the least bell's vireo survey results and methods, and any comments on the survey report.**	
66	Appendix 4.4-A	**Provide surveyor qualifications and 10(a)(1)(a) permits for each QCB surveyor. Provide surveyor qualifications and permits, as appropriate for the coastal California gnatcatcher, least bell's vireo, and western burrowing owl surveys.**	The information requested is being provided via file transfer to the CPUC and includes a summary of qualifications, along with copies of permits and resumes for staff who conducted QCB, CAGN, LBV, and WBO surveys (**Attachment AD.66-1**).
67	Appendix 4.4-A	**Provide additional data to document locations of least bell's vireo and occupied habitat within the transmission corridor.** Section 4.4 of the PEA and the Biological Resources Technical Report lacks survey results or data from presence/absence surveys for least bell's vireo within the transmission corridor. The PEA states that protocol surveys for least bell's vireo were only conducted for the substation area. The vegetation mapping for the project indicates that there is potential least bell's vireo habitat within the transmission corridor (i.e., riparian woodland, southern willow scrub, riparian scrub, mulefat scrub). Further, the results of the California gnatcatcher survey indicate that least bell's vireo were observed during surveys of the transmission corridor. Please provide the following information: a) Identify the locations where least bell's	No least Bell's vireo (*Vireo bellii pusillus*; LBV) were detected within the proposed Salt Creek Substation and transmission corridor or within 500-feet of these features (i.e., survey buffer) during Project Surveys. Two LBV observations were recorded outside the survey buffer (i.e., beyond 500 feet of Project features) during Project surveys. One was detected during 2011 LBV surveys and the other was incidentally detected during 2012 California gnatcatcher (*Polioptila californica californica*) surveys. The habitat immediately adjacent to and outside of the substation is narrow and fragmented. Further southeast of the substation the off-site riparian corridor widens and provides better quality habitat for LBV. No LBV protocol surveys were completed within the transmission corridor because the habitat is of marginal quality. The habitat within the transmission corridor consists of small, isolated fragments of degraded riparian habitat that is subject to high levels of human disturbance as a result of urban areas lining the corridor. Additionally, there are no known historic LBV locations in the vicinity. The LBV is not expected to occur within the transmission corridor; however, if the CPUC would nonetheless like SDG&E to assume presence and complete a pre-activity survey per the NCCP, SDG&E will do so.

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		vireo were observed during other species surveys including the California gnatcatcher survey. b) Conduct a survey within all riparian areas and other potential vireo habitats within the transmission corridor following the USFWS Least Bell's Vireo Survey Guidelines, dated January 19, 2001. SDG&E may alternatively assume that all least bell's vireo habitat in the transmission corridor is occupied and conduct pre-activity surveys following agency protocols and in accordance with the NCCP. c) Provide the survey report(s) if a previous survey was conducted for least bell's vireo within the transmission corridor. If SDG&E is proposing to use a reduced survey effort for least bell's vireo within the transmission corridor, SDG&E must obtain USFWS concurrence with the survey approach and submit a record of USFWS concurrence to CPUC.	
68	4.4	**Provide substantial evidence to support the determination that there will be a less than significant impact to Quino checkerspot butterfly in the absence of habitat mitigation.** Additional information is required to support the conclusion in Section 4.4 of the PEA that no mitigation is required for impacts to Quino checkerspot butterfly suitable habitat. We understand that compensation acreage was acquired within the Otay Ranch Preserve when the substation parcel was purchased; however, this	No Quino checkerspot butterfly (*Euphydryas editha quino*; QCB) were found during QCB surveys. The habitat within the transmission corridor is not suitable habitat due to the presence of extensive invasive grasses that excluded most native vegetation, impacts from previous grading, off-road activity, or human activity, abundant invasive invertebrate species, and lack of larval host plants. Suitable habitat only occurs within the proposed Salt Creek Substation; however, no QCB were detected in this area. SDG&E has an approved Low-Effect HCP for QCB. SDG&E's HCP for QCB delineates potential QCB habitat (referred to as "Mapped Areas") based on the 2003 USFWS QCB recovery plan. Mapped Areas occur within SDG&E's NCCP preserve at the north end of the Transmission Corridor. Project surveys determined that in fact, no suitable QCB habitat occurs within these Mapped Areas. Per the HCP, habitat mitigation is only required for

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		acreage does not compensate for effects to species on the power line corridor.	impacts to suitable habitat within Mapped Areas or for impacts to suitable habitat that is occupied. These conditions do not exist for the proposed Project; thus, no habitat mitigation is required.
69	4.4	**Provide biological survey data for alternative staging areas at the Olympic Training Center.**	A general biological survey was performed for the alternative staging areas as noted in Deficiency Report Response No. 7. A letter summarizing those results was provided as an attachment to the deficiency letter (**Attachment DR.7-1**).
Cultural Resources			
70	4.5, pages 4.5-2, 4.5-13 to 4.5-15	**Consider surveying larger areas along the alignment for cultural resources to allow for flexibility during project construction.** The cultural resource report states that the survey area includes 10 feet on either side of the access road. Larger areas should be surveyed to allow for flexibility when constructing the project. If any poles, roads, etc., need to be relocated during construction, relocation would not be allowed without additional CEQA review unless the area was previously surveyed.	SDG&E appreciates the concern for flexibility during construction, and for this reason completed intensive pedestrian surveys of the entire 120 foot-wide construction corridor, access roads with a 10-foot buffer on either side, and ancillary projects components (e.g., staging areas, stringing sites), as noted in the technical studies prepared by both AECOM and HDR. Survey limits are shown in the GIS data and figures provided in Deficiency Report Attachment DR.9-1. Therefore, the survey area was large enough to allow for necessary flexibility during construction.
71	4.5.3.1, page 4.5-8	**Please provide written documentation of any correspondence with the Native American Tribes including correspondence since the PEA was completed.** SDG&E's correspondence with Native American tribes is identified in the PEA (Page 4.5-8). Letters were mailed to local Native American tribal groups and/or individuals listed by the NAHC. The PEA states that only one response was received. Please provide this correspondence and discuss any measures taken by SDG&E to respond to tribes. Given the number of archaeological resources in	Correspondence related to the one response from Ipai Nation of Santa Ysabel is provided in **Attachment AD.2-1**. No additional correspondence has been received.

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		the project area and Native American interest in the region, has any additional outreach been performed or additional correspondence received from the tribes?	
72	4.5.3.1, Table 4.5-1	**Revisit and revise the classification of archaeological sites CA-SDI 4529, 7197, 8651, and 12067.** Table 4.5.1 (PEA 4.5.9) describes "potentially significant" CA-SDI sites 4529, 7197, 8651, 12067) as "lithic scatters;" however, the diversity, types, and amounts of tools and groundstone found in these sites indicates that these sites are camps/habitation sites, or multi-use sites and not just lithic scatters.	In response to the request to reclassifying the site type of lithic scatters identified within the project area, a further review of the Department of Parks and Recreation 523 site forms of sites CA-SDI-4529, 7197, 8651, and 12067 was conducted by AECOM and SDG&E archaeologists. It was determined that, while these sites represent complex scatters of lithic materials, they also represent various loci that represent "special use areas". Based on the diversity and quantity of materials documented, these sites do not meet the threshold for reclassification as habitation debris under the Office of Historic Preservations (OHP) Guidelines for recording cultural resources (OHP 1995). All reviewers concurred that these sites could instead be interpreted as multi-use areas based on documented characteristics. "Multi-use site" is not a recognized OHP site type but "lithic scatter" and "habitation debris" are site types present in the OHP guidelines. Between the two, "lithic scatter" better describes sites CA-SDI-4529, 7197, 8651, and 12067. References Office of Historic Preservation (OHP) 1995 Instructions for Recording Historic Resource.
73	4.5.6, pages 4.5-27 to 4.5-29	**Revise the APMs CUL-1, CUL-2, CUL-3, and CUL-6 to include additional information to show that the measures are effective in reducing impacts to a less-than-significant level and are implementable. These revisions may alternatively be incorporated into a revised measure to address Deficiency 8, identified in the Deficiency Report for this project.** • **CUL -1:** Identify the appropriate work practices necessary to effectively implement APMs and the procedures to be	Replace APMs CUL-1, CUL-2, CUL-3, CUL-5, and CUL-6 with the following: APM-CUL-1: A qualified archaeologist shall attend pre-construction meetings, as needed, to consult with the excavation contractor concerning excavation schedules, archaeological field techniques, and safety issues. Proposed Project personnel shall receive training regarding the appropriate work practices necessary to effectively implement the APMs, including the potential for exposing subsurface cultural resources and paleontological resources. . This training shall include procedures to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as paleontological resources. Such appropriate work practices and inadvertent discovery procedures are outlined in the CMMP. The requirements for

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		followed upon the discovery or suspected discovery of archaeological materials so that readers can evaluate whether it is adequate for minimization of impacts. • **CUL-2:** Specify what monitoring entails – the monitor should be a qualified archaeologist. Monitoring should be performed by a qualified cultural resource specialist/ archaeologist. A no-work buffer should be established for any discoveries. The measure should specify the criteria by which the resource will be evaluated for significance (i.e., (1) eligible for the CRHR (and thus a historical resource for purposes of CEQA); or (2) a unique archaeological resource as defined by CEQA). The CPUC should be consulted for the determination of impacts and to ensure no substantial change would occur. See the deficiency report. A Cultural Resources Monitoring and Management Plan (CRMM) and a Treatment Plan (TP) should be prepared before the start of construction. The provisions identified here can be incorporated into a measure requiring a CRMM and TP. • **CUL-3:** The measure does not specify the steps to be followed if a resource is found along an access road. Monitoring does not reduce effects to less than significant levels. The measure should specify the specific actions that must be taken to reduce effects to less than significant levels. The provisions identified here can be incorporated into a measure requiring a	archaeological monitoring shall be noted on the construction plans. APM-CUL-2: Monitoring shall be conducted by an archaeologist that meets the U.S. Secretary of Interior Professional Qualifications Standards, as published in 36 Code of Federal Regulations (CFR) Part 61. Monitoring will be conducted according to the procedures outlined in the CMMP and will occur during proposed pole 14225. If the previously-delineated work areas must be expanded or modified during construction, the cultural monitors would review the previous survey data for the proposed project to determine if the additional impact area to determine if any sensitive resources would be impacted by the proposed activities, to identify any necessary avoidance and minimization measures, and to document any additional impacts, and avoidance and minimization measures. The CMMP will address any project refinements that go outside of previously evaluated work areas and will detail the appropriate measures to be implemented. The CMMP will specify the criteria by which the resource will be evaluated for significance. The CMMP will also outline the consultation requirements. In the event that cultural resources are encountered during ground-disturbing activities, the archaeologist shall have the authority to divert or temporarily suspend ground disturbance to allow evaluation of potentially significant cultural resources. The archaeologist shall follow the appropriate reporting and treatment procedures outlined in the CMMP before activities are allowed to resume. APM-CUL-3: If ground-disturbing activities, such as grading, are to be conducted along access roads, monitoring shall occur where the access road crosses the site or is located with the boundaries of a site, and equipment blades shall be lifted when traversing sites. Monitoring shall occur for ground-disturbing activities associated with access road improvements within the Existing Substation property. Additionally, all vehicles shall remain on existing dirt roads and new access identified for the Proposed Project. If needed, additional overland travel or access routes shall be reviewed, and appropriate avoidance measures and monitoring shall be implemented. All access routes and work areas will be evaluated for cultural resources to ensure avoidance and minimization measures in the

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		CRMM and TP. • **CUL-6:** A no-work buffer should be established for any paleontological discoveries. The measure should specify the criteria by which the resource will be evaluated for significance. The CPUC should be consulted for the determination of impacts and to ensure no substantial change would occur. The steps to be taken to allow work to resume should be identified in the measure.	CMMP are followed. In the event that a resource is observed while monitoring an access road, appropriate inadvertent discovery procedures outlined in the CMMP shall be followed before activities are allowed to resume. • APM-CUL-5: A paleontological monitor shall work under the direction of the qualified Proposed Project paleontologist, and shall be on-site to observe excavation operations that involve the original cutting of previously undisturbed deposits with high paleontological resource sensitivity (i.e., Mission Valley and Otay Formations). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. If the previously-delineated work areas must be expanded or modified during construction, the paleontological monitors would review the previous survey data for the proposed project to determine if the additional impact area to determine if any sensitive resources would be impacted by the proposed activities, to identify any necessary avoidance and minimization measures, and to document any additional impacts, and avoidance and minimization measures. APM-CUL-6: In the event that fossils are encountered, the Proposed Project paleontologist shall have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely manner. The paleontologist shall follow the appropriate treatment procedures outlined in the CMMP before construction activities are allowed to resume.
Geology and Soils			
74	4.6	**Please provide information on where the soil stockpiles will be located, both for temporary storage at the various work sites and for import soil.**	All stockpiles including cut and import fill will be temporarily located within the delineated area for each pole site, as indicated on the preliminary grading plans provided in response to question 7, or in the existing SDG&E transmission corridor access road. The stockpiles will be placed such that continuous access on the existing roads is maintained. To mitigate the soil export quantity at sites with cut, the stock piles may be located at adjacent poles sites requiring fill, but in accordance with the statement above. All export soil will be handled in accordance with all applicable laws and disposed at an SDG&E approved disposal site. All stockpiling for substation site development will be within the identified permanent or temporary disturbance limits.

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75	Appendix 4.6-B	**Please provide data for corrosion testing within the proposed substation area and the transmission line corridor, or state when these data will be collected.** There is one corrosivity test result from the URS (2011) geotechnical investigation of TL 13826, included in Appendix 4.6-B to the PEA. There is no information in the geotechnical reports that describes any corrosion testing that was performed on soils within the proposed substation area or the majority of the transmission line corridor.	Transmission Line data is provided in **Attachment AD.75-1.** Substation site scope was provided with the PEA. See "Geotechnical Investigation, Proposed SDG&E Otay Ranch Substation" March 7, 2008 by Kleinfelder, pages 38 and 39 of 42. One corrosion test was performed and evaluated.
Hazards and Hazardous Materials			
76	4.8.4, pages 4.8-12 through 4.8-17	**Please provide the Hazardous Substance Control and Emergency Response Plan (HSCERP) for the project, if one has been prepared. Alternatively, please provide confirmation and justification of whether an HSCERP is required for the project and will be prepared at a later date.** Appendix 1-A, CPUC Checklist, requires inclusion of a HSCERP, if required. It is stated in the right-hand column that this plan is addressed in Section 4.8 of the PEA. There is no HSCERP included with the PEA. There is no mention of an HSCERP in Section 4.8 of the PEA.	A Hazardous Substance Control and Emergency response Plan has not yet been developed for the project. A Hazardous Substance Control and Emergency Plan may be required for the project, however, the plan would not be called a HSCERP. Per California Health & Safety Code (CA-HSC) sections 25500-25520, the plan would be known as the Hazardous Materials Business Plan (HMBP). Per the CA-HSC, the Hazardous Materials Business Plan will be developed if the requirements stipulated in section 25503.5 are met. i.e. hazardous materials onsite for more than 30-days equal to or greater than 55-gallons of a liquid, 500 pounds of a solid, and/or 200 cubic feet of a compressed gas, etc. Once it has been determined that the HMBP is required to be written for the site, the HMBP will follow the statutory requirements in CA-HSC sections 25500-25520. As per the CA-HSC, the completed HMBP will be submitted to county of San Diego Department of Environmental Health, Hazardous Materials Division (DEH-HMD) which is the governing/administering agency also known as the Certified Unified Program Agency (CUPA). The CUPA will inspect the project site as necessary per environmental rules/regulations and the CUPA operating standard(s).
Hydrology and Water Quality			
77	Question	**Please estimate the quantity of water that will be**	SDG&E estimates that Salt Creek irrigation will consume approximately 260 units (one

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	4.9b, page 4.9-17	**required for operation and maintenance of the project.**	unit=748 gallons) of water in a six month period after the plants have become established. After the 5 year mark has passed, the six month consumption amount should decrease by approximately 30%. Please note that this acreage is located in an exceedingly harsh plant growth environment; wind & salt are in abundance with the soils being hard. SDG&E anticipates close to year round watering to be necessary for the majority of the 5 year period throughout the entire landscaped area in order to speed up plant growth so the vegetation coverage occurs sooner.
Land Use			
78	4.10	**Provide records of all correspondence and meetings held with the City of Chula Vista and the University Framework Committee regarding the Salt Creek Substation Project and site selection.**	SDG&E included as Appendix 1-B of the PEA a copy of the staff report from the meeting at which the Chula Vista City Council approved the location of the substation. This staff report provides evidence of the many meetings that were held with the City of Chula Vista to determine an appropriate substation site. Appendix 1-B also includes a letter of support from the City of Chula Vista, which provides further evidence of the series of meetings held with the City. The meetings were informal, working meetings, primarily with City staff, rather than noticed, public meetings of the decision-making bodies. Therefore, there are no agendas, staff reports, or minutes for most of the meetings. **Attachment AD.78-1** includes a summary of meetings with the City regarding the Salt Creek Substation project and the site selection as well as copies of available records in its possession reflecting correspondence and meetings with the City regarding the site selection.
Noise			
79	4.12.3.2, Table 4.12-5, Page 4.12-12	**Provide measured data logs for L1, L25, and L50 sound levels (A-weighted noise levels exceeded 1 percent, 25 percent, and 50 percent of the time, respectively).** The data for L1, L25, and L50 sound levels were not provided. These data are needed to define how the noise environment changes over time and	Comment noted and requested details of noise monitoring data are now provided (see **Attachment AD.79-1**) as an appendix to the PEA.

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		assess significant impacts. The L25 level is also the parameter used for assessing construction noise impacts under the San Diego County noise ordinance.	
80	4.12.4.2, Question 4.12(a), Page 4.12-13	**Provide noise modeling details, including results, locations of modeled noise levels, and construction equipment included in the modeling.** The PEA references the Federal Transit Administration construction noise modeling method, but lacks sufficient detail on how the noise modeling was conducted for this project and how noise levels were predicted for various sensitive receptors. This information is needed to verify the impact analysis.	Comment noted and requested details of noise modeling are now provided (see **Attachment AD.80-1**) as new Appendix 4.12-2 to the PEA.
Recreation			
81	page 4.15-8	**Provide the locations and distances that trail segments will be closed along the power line alignment. Provide the timeframe for closure of each segment. Describe how pedestrian and bicycle traffic will be managed during trail closures.** The PEA states "Construction notices and temporary closures would be posted to alert the public of any construction in the area. SDG&E would coordinate with the City of Chula Vista on trail closures, as needed, during construction." Additional information is needed to assess the impacts of trail closures.	The updated map books include the location of the existing trails in the project vicinity. In general, construction activities at a given location would not last longer than approximately 7 days, but the construction activities would not all occur in consecutive days. During construction, work areas would be demarcated to maintain safe conditions during construction and to accommodate public access through the area to the extent feasible by delineating safe pedestrian corridors. Given the number of trails and existing access roads along the transmission corridor, there are opportunities to redirect pedestrian and bicycle traffic to maintain safe distances from construction activities, without creating lengthy detours. The site specific measures will be identified as warranted during construction to maintain safe public access. If required for safety reasons, short term limited trail closures may be acquired. There are no official existing trails in the SDG&E easement adjacent to the proposed Salt Creek Substation. However, the existing access roads are used by the public and work areas would be demarcated to maintain safe conditions during construction and to accommodate public access through the area to the extent feasible by delineating safe pedestrian corridors. As illustrated in the Project map book, the existing trails along the corridor between Hunte

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			Parkway and East Lake Parkway are located along the edge of or outside of the SDG&E easement and therefore are not expected to be impacted during construction. There is the potential for trail closures or re-routings between Mount Miguel Road and Proctor Valley Road during the work at Locations 30, 31 and 32. In addition to the existing trail on the east side, there is also an existing access road on the west side, providing options for the temporary re-routing of trail. If required, short-term trail closures of these short trail segments in a suburban development would not result in any significant impacts because there are convenient alternative routes.
82	page 4.15-8	**Clarify whether the Hunte Parkway Trail will be closed to pedestrians and bicyclists during construction of the substation. If temporary trail closure or a pedestrian detour is proposed, define the length of time that the trail will be closed.** The PEA describes impacts to Hunte Parkway Trail associated with construction noise and dust. It is not clear whether the trail will also be closed and pedestrian traffic will be rerouted for a period of time.	The public trail along Hunte Parkway may need to be closed during some of the distribution work in Hunte Parkway. However, there is an existing sidewalk on the north side of Hunte Parkway that provides alternative access should the trail on the south side of Hunte Parkway need to be closed for short periods of time. This trail closure would be included as part of the traffic control plan that would be required prior to commencing the distribution work in Hunte Parkway.
Transportation and Traffic			
83	4.16.4.1, Question 4.16(a), Page 4.16-9	**Please provide the traffic control plan referenced in the PEA or describe what will be included in the traffic control plan and how implementation of the plan will avoid significant impacts.** The PEA states that SDG&E will draft and implement a traffic control plan but does not describe what would be contained in the plan or how implementation of the plan would avoid significant impacts.	The traffic control plan for this project will be developed approximately six to twelve months prior to the start of construction. A plan for a recent project in generally the same area has been provided for illustrative purposes (**Attachment AD.83-1**).
84	4.16.4.1, Question 4.16(a),	**Clarify whether trenching would take place in public streets. Describe whether lane or road closures would be necessary, and the extent of**	Page 4.16-10 refers to TL 6965 and the loop in of TL 6910 to the Salt Creek substation; no trenching in the streets will be performed for *these* portions of the project.

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	Page 4.16-10	**those closures, to facilitate trenching in public streets.** The PEA states that trenching would not occur within public streets. The PEA then says that no more than 500 feet of trench would be left open on the public street at any one time.	The location of the distribution get-away duct trenches are shown conceptually on the revised Project map book included in **Attachment AD.11-1 and AD18-1**. The distribution get-aways which end in Hunte Parkway near the driveway entrance to the substation are all located within the permanent impact area of the Salt Creek Substation. There will be trenching in franchise areas where existing facilities are not available and appropriate traffic control plans will be developed and implemented closer to time of construction (refer to question 83). A clarification was made in the legend for maps provided (**Attachments AD.11-1 and AD.18-1**). Access roads in the legend were shown as red dotted lines very similar to underground transmission lines. Access roads are actually red dotted lines with a white background.
85	4.16.4.1, Question 4.16(c), Page 4.16-13	**Discuss whether any project components may trigger FAA regulations.** The PEA does not state if any structures would trigger any FAA requirements related to tall structures.	Federal Regulation Title 14 CFR Part 77 establishes the standards and notification criteria for the construction or alteration of objects affecting navigable airspace. In general, projects involving the construction or alteration of objects that exceed 200 feet in height above ground level, or the construction or alteration of objects that exceed the imaginary airport surfaces described in Part 77.9(b) of said CFR, require notification to the FAA. This noticing criteria applies to both public use and military airports, as well as private airports with at least one FAA-approved instrument approach procedure. SDG&E's airspace obstruction consultant has evaluated the Project based on the above notice criteria and determined that none of the proposed transmission line or substation structures require noticing to the FAA.
86	4.16.4.1, Question 4.16(d), (e)	**Discuss impacts related to hazards from incompatible uses of area trails and roads by construction equipment, pedestrians, and bicyclists.** The PEA does not analyze potential impacts to other utility or pedestrian access roads contained within the substation improvements or utility corridor (e.g., potential for reduced access to the sewer	Please refer to the response to question #81 regarding maintaining safe conditions for pedestrians and bicyclists on access roads during construction. Access at work areas would be restricted as necessary to maintain safe conditions during construction and to avoid conflicts with pedestrians or bicyclists who may be in the vicinity during construction. During construction work within the Transmission Corridor, access for bicyclists and pedestrians may be temporarily affected for safety reasons. Primary access for substation site development will be the sewer access road which exists

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		access road maintained by the City of Chula Vista). The PEA does not discuss the potential for hazards due to construction traffic on access roads that are currently used by pedestrians and bicyclists.	in an easement granted to the City of Chula Vista across the substation parcel. Public access to the sewer access road is limited by an existing swing gate. Secondary access for substation site development, to be used when scheduled site development activities impact the sewer access road (e.g. retaining wall construction for sewer access road widening), will be the existing access road(s) within the transmission ROW and the planned 69kV underground transmission alignment grading northeasterly of the substation parcel. Please refer to the response to question 81 regarding maintaining safe conditions for pedestrians and bicyclists on ROW access roads during construction. Construction related traffic turning into the sewer access road may require temporary closure of the decomposed granite trail on the southerly side of Hunte Parkway. These construction activities may require diversion of pedestrian traffic to the northerly side of the street (to the concrete sidewalk), or may require signage advising safe methods for crossing of the driveway. This may also occur during the construction of the underground distribution get-aways. The sewer access road across the substation parcel and access easement from Hunte Parkway will be closed to public traffic during all phases of substation construction. The southerly extension of the sewer access road beyond the substation parcel is accessible from the existing transmission ROW access road(s). Please refer to the response to question 81 regarding maintaining safe conditions for pedestrians and bicyclists on ROW access roads during construction.
Utilities and Service Systems			
87	4.17	**Provide a map and cross-section to show the locations of all existing utility lines within the utility corridor and at the substation, including:** **a) Gas lines** **b) Potable water lines** **c) Recycled water lines and proposed connection point for substation operation**	*Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; CPUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.* In response to (a), (b), and (d): See **Attachment AD.87-1** for a representative cross section at one location in the transmission corridor showing the relationship of the existing power lines, the proposed new power line, the gas lines, and the closest water line. In addition, **Attachment DR.12-1 provided in response to the Deficiency Report provided additional**

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		(e.g., landscape maintenance)) **d) Existing power lines -** **e) Cable, telephone, or other communication infrastructure (e.g., cell towers)** **f) Sewer lines**	**detail regarding gas lines, water line, and proposed power line.** In response to (c): At this point it is too early to provide details on water services – actual locations will be finalized in consultation with the City of Chula Vista during design review. In response to (e): The cell phone tower that was observed during the Salt Creek Project site visit with the CPUC is not within the SDG&E ROW. Within the ROW only two of the 230kV structures have outside telecommunication equipment attached – Sprint has equipment at structure Z283971 (see attached drawings – **Attachment AD.87-2**) and Cricket has equipment at structure Z283968 (see attached drawings - **Attachment AD.87-3**). In response to (f): See attached (**Attachment AD.87-4**) for plan and cross-sections of sewer access road showing preliminary construction of duct packages and MSE wall grid zones in relation to existing sewer line.
Other CEQA Considerations			
88	Table 6-1	**Data Need Cumulative-1: Identify additional cumulative projects and the estimated construction schedule (start and end) for each cumulative project.** Table 6-1, showing planned and proposed projects in the proposed project vicinity, does not include a number of projects that were discussed during the site visit on October 14, including: a) SDCWA's pipeline maintenance project that is currently under construction adjacent to the proposed power line b) The school development that is proposed at the Hunte Parkway staging area c) The University Framework Committees planned development d) Any other projects that SDG&E is aware of	Cumulative projects discussed on the site visit are summarized below: **a) Project:** Pipeline 3 Relining Project – Sweetwater to Lower Otay Reservoir **Project Type:** Pipeline relining **Project Description/Size:** Installation of steel liners in approximately 28,400 linear feet of existing 69-inch diameter PCCP **Project Location:** Eastern portion of the City of Chula Vista in the Bonita Meadows, Bonita Long Canyon, Eastlake, Eastlake Greens, Eastlake Business Center, and Otay Ranch communities into the Otay Ranch Preserve and Otay Lakes Regional Park **Permitting Status/Schedule:** Construction began in September 2013. Estimated construction end date Mid 2014 **b) Project Type:** Middle School **Project Location:** intersection of Hunte and Eastlake Parkway **Permitting Status/Schedule:** Construction to begin in mid-January 2014 **c) Project:** EIR for the Otay Ranch University Villages Project

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		in the vicinity of the project that were not listed in Table 6-1 of the PEA.	**Project Type:** Residential development and associated village land uses **Project Description/Size:** Project proposes 6,897 homes and associated village land uses on approximately 755 acres and includes roughly 620 acres of Open Space Preserve for a total project area of approximately 1,375 acres. **Project Location:** Located within Otay Ranch **Permitting Status/Schedule:** Construction of Village 3 North is anticipated to begin in late 2014 and be complete in 2018; Construction of Village 8 East is anticipated to begin in early 2016 and be complete in 2024; Construction of Village 10 is anticipated to begin in mid-2023 and be complete in 2029. **Additional information** **d) Project:** Install ANSI 600 & ANSI 300 3" Dual Run Reg Stations **Project Type:** Gas line tapping **Project Description/Size:** Tapping 36" Transmission Line south of Hunte Parkway and installing a Reg station perpendicular to the tap **Project Location:** Hunte Parkway between L-3600 & Eastlake Parkway **Permitting Status/Schedule:** Construction begins in mid-January 2014 for 3-4 months **e) Project:** Solar Photovoltaic Project Phase II **Project Type:** Solar photovoltaic installation **Project Description/Size:** Installation of up to 1.2 MW of Solar Photovoltaic arrays at up to six City facilities. **Project Location:** Corporation Yard; Civic Center; Rohr Park; Salt Creek, Montevalle, and Loma Verde Centers **Permitting Status/Schedule:** Award of the design build contract is scheduled for the fourth quarter 2012. (Source: City of Chula Vista 2012/13-2016-17 Capital Improvement Program) **f) Project:** Otay Lakes Road Widening, East "H" St. to Telegraph Canyon Road **Project Type:** Road widening

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			Project Description/Size: Widen Otay Lakes Road to six-lanes between Telegraph Canyon Road and Ridgeback Road and will widen East H Street from Otay Lakes Road to the west, including dual left-turn and dual right-turn lanes from eastbound East H Street to Otay Lakes Road. **Project Location:** Telegraph Canyon Road to Canyon Drive and East H Street to East/West of Otay Lakes Road **Permitting Status/Schedule:** Construction in 3 phases (Source: City of Chula Vista 2012/13-2016-17 Capital Improvement Program) **g)** **Project:** Otay Ranch Village 1 AD 97-2 Maintenance **Project Type:** Street maintenance **Project Description/Size:** Continued maintenance of major public streets within Otay Ranch Village 1, including, but not limited to: sidewalks; curbs; gutters; drainage; paths; medians; street lighting; sewers; and, landscaping. **Project Location:** Heritage Road between Telegraph Canyon Road and East Palomar Street; East Palomar Street between Heritage Road and Santa Delphina Avenue **Permitting Status/Schedule:** Project to be brought forward to Council for the appropriation of the funds during the FY 13 CIP budget process. (Source: City of Chula Vista 2012/13-2016-17 Capital Improvement Program) **h)** Reviewed Caltrans 2013 Major Construction Projects but did not find anything in the vicinity of the project area.