From:	Jeff Thomas
To:	RGiles@semprautilities.com; Carter, Bradley; DCollins@semprautilities.com; acolton@semprautilities.com
Cc:	Billie C. Blanchard; Sterkel, Merideth "Molly"; Mary Jo Borak; shanna.foley@cpuc.ca.gov; Gruen, Darryl; christopher.myers@cpuc.ca.gov; Anne Lynch; ngordon@sohagi.com; Susanne Heim
Bcc:	Jeff Thomas
Subject:	Follow-up to SDG&E Sycamore-Penasquitos Data Request #17 Response - Biological Resource Impacts
Date:	Wednesday, August 05, 2015 12:16:16 PM
Attachments:	image001.png

Rebecca,

We've reviewed the information that SDG&E provided in response to Data Request #17 and there is an outstanding point that needs to be resolved before we can finish the EIR analysis. We understand that SDG&E has committed to reducing habitat impacts from the Sycamore-Peñasquitos Project to 29.4 acres. One of the revisions that SDG&E made in order to meet this 29.4 acre commitment was to remove our calculated access road impacts (based on four-foot buffer from edge of road) from the project GIS data. As stated in your data response, SDG&E "…believes that a blanket assumption of impacts to natural communities within a buffer adjacent to all access roads does not accurately describe the Proposed Project or the actual impact the Proposed Project may have." However, our analysis is based on the information (or lack thereof) provided by SDG&E in its PEA project description and data responses. We believe that inclusion of access road buffers are necessary in order to consider the reasonable extent of project construction impacts in our CEQA analysis. To date, SDG&E has described the need for access road refreshing but has not been specific as to the activities involved in "refreshing", or the location(s) where this would occur. SDG&E's response to Data Request #17 indicates "SDG&E cannot know what the existing access road conditions may be at the time of construction, and exact road repairs (such as road refreshing) also cannot be known at this time." Based on the information SDG&E has provided, and the CPUC's experience, access road buffers have been included to account for a reasonable project impact and to give SDG&E flexibility during project implementation such that a Petition for Modification would likely not be necessary.

For purposes of the CEQA analysis, removing the calculated buffer impacts would necessitate an assumption that all project construction-related work areas could be accessed during construction without impacting any sensitive habitats (i.e., all construction vehicles and equipment would fit within existing disturbed areas that are free of vegetation on the access road and there would be no passing locations outside of disturbed areas). Is SDG&E committing to this? Your response to Data Request #17 suggests otherwise. SDG&E's response noted that "If any road repairs are required outside of existing/historic access road alignments, SDG&E would conduct the appropriate review required for a deviation from the final engineering footprint and account for any impacts to natural communities during that review." This approach is actually in conflict with SDG&E's proposed limit of impacts to 29.4 acres because the 29.4 acres assumes no vegetation impacts outside of the disturbed road bed.

To ensure that no vegetation impacts occur along access roads during project construction, it would be necessary to install construction fencing (e.g., staking with rope or orange barrier safety fencing) along all access roads to ensure that use of and work on those access roads does not deviate from the existing roadbed. Is SDG&E willing to commit to such a measure? If not, what would be the maximum amount of additional access road improvements by habitat type and acreage that would be required outside of the existing disturbed road in order to assure sufficient access for project construction?

Jeff Thomas, Senior Manager
Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, CA 94111
o.650.373.1200 • **d.**650.290.7216 • **c.**510.646.2145
www.panoramaenv.com

PANORAMA
ENVIRONMENTAL, INC.