PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 7, 2014

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court, CP32D
San Diego, CA 92123-4150

RE: Application Completeness - Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project – Application No. A.14-04-011

Dear Ms. Giles:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of San Diego Gas and Electric Company's (SDG&E) Application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project.

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

After review of SDG&E's application for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate EIR in a timely manner. The attached report identifies the portions of the application found to be deficient.

Information provided by SDG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this report no later than July 7, 2014. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: ALJ Yacknin
Charlotte Terkeurst, Commissioner Picker Interim Chief of Staff
Nicolas Chaset, Interim Advisor to Commissioner Picker
Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Peter Allen, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental

DEFICIENCY REPORT FOR THE SDG&E SYCAMORE-PEÑASQUITOS 230 KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company's (SDG&E) Application (A.14-04-011) and Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line 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 Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies

#	PEA Section(s)/ Page #	Deficiency
Project Description		
1	Section 3.1, Page 3-2; Section 3.3.1, Page 3-3; Section 3.3.3.1, Pages 3-19 to 3-20; Section 3.3.5.3, Page 3-24	**Section 3.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding relevant substations to the project and schematic diagram of the existing system** ***Identify the locations of the Chicarita, San Luis Rey, Encina (and/or Encina Hub, if different), Palomar Energy, and Mission Substations discussed in the PEA. Describe conductor connection and transmission "upgrade" activities, the duration of work, and equipment that would be used at these substations. Identify these substations on the system diagram.*** The PEA Project Description states that minor alterations would be required at the Chicarita, San Luis Rey, Encina, Palomar Energy, and Mission Substations; however, little detail on the work required was provided in the PEA. Provide a thorough description of the activities that would be performed at these locations and the scope of proposed transmission upgrades. Please identify these substations on the existing diagram and provide GIS files of locations, as appropriate.
2	Section 3.3, Table 3-2, Page 3-6; Section 3.3.3, Page 3-18; Section 3.3.3.1, Page 3-19	**Section 3.7.2.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding conductor installation** ***Define conductor bundling (also referred to as "jumpered" together) and consolidation techniques in detail. Describe any specific differences between installing bundled conductor and single line stringing or reconductoring. Identify any workspace or access requirements for bundling/consolidation of TL 23001 and TL 23004 between the project corridor (from Carmel Valley Road to the San Luis Rey Substation, and Peñasquitos***

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
	to 3-20; Section 3.3.6.3, Table 3.8, Page 3-25	***Junction to the Mission Substation) and substations located outside of project corridor.*** The PEA Project Description describes bundling and consolidation of TL 23001 with TL 23004 and TL 675 with TL 6906, in order to create a vacant position on existing structures for the new 230 kV transmission line. Additional information is required on the consolidation methods. The PEA Project Description states that TL 23001 and TL 23004 would be "jumpered" together to create one bundled 230 kV circuit between the San Luis Rey Substation and Carmel Valley Road, as well as between the Peñasquitos Junction and Mission Substation. Please identify the location of any work areas, access roads, and stringing sites that are outside of the project corridor as defined in the Project Description and that would be required to bundle these existing lines.
3	Section 3.4.1.1, Page 3-26; Section 3.4.6.6, Page 3-41	**Section 3.7.1.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding access road preparation** ***Clarify activities involved in the reestablishment (also referred to as "smoothing or refreshing") of existing access roads. Identify which access roads will be reestablished.*** The PEA Project Description states "existing access roads may be re-established or otherwise maintained to ensure that construction access is available." Please provide a detailed description of how access roads would be reestablished, provide details on proposed earthwork (e.g., grading or blading), and identify which access roads would be reestablished.
4	Section 3.4.1.2, Page 3-27	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding maintenance pad preparation** ***Provide locations and a thorough description of retaining walls to be constructed for maintenance pads.*** The PEA Project Description states "retaining walls would be installed to ensure safety and stability of the transmission line maintenance pad where geologic and topographic conditions warrant." Please provide a detailed description of the location and the design of retaining walls.
5	Section 3.4.1.6, Page 3-29; Section 3.4.6.4; Section 3.4.7, Page 3-41; Appendix 3-B	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding work area locations** ***Confirm guard structure locations are sufficient in number and size to guard all conductor construction activities. Identify utility crossing points where any type of guard structure would be installed.*** The PEA Project Description states that different types of guard structures would be used to protect road crossings, existing electrical and communication facilities, or vehicle and/or pedestrian traffic in the event of an accidental fall. Confirm that guard structure installation locations in Segment A (GS1 through GS46) and Segment D (GS47 and GS48) are correct and sufficient as mapped in Appendix 3-B, including where lines would be permanently removed. Please confirm that no guard structures would be installed adjacent to Highway 56 between E4 and E5, Angelique Street between P12 and P13, Ivy Hill Drive

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
		between P19 and P20, and Village Ridge Drive between P17 and P18, or identify the locations where they would be installed. Identify existing utility crossing points and the type of guard structures that would be covering those points, in the event of an accident fall.
6	Section 3.4.1.5, Page 3-29; Appendix 3-D	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding work area locations** ***Identify the temporary work area limits for proposed structure removals.*** The PEA Project Description states that "all structural removal would be completed from existing work pads (typically 35 feet by 75 feet) located at each existing pole site or using new structure temporary work areas, as-needed." In addition to the new structure work areas, existing work pad areas for structure removal need to be delineated on project maps and included in GIS data in order to confirm that no new impacts would result from structural removals. Specifically, please identify the existing work area limits for structure removals at pole locations R20, R23, R24, R25, R30, R34, R36, R39, R40, R42, R43, R44, R46, R52, R62, R63, R66, R67, and R68.
7	N/A	**Section 3.4, 3.7.1.2, and 3.7.1.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding GIS data layers, access roads, and work area locations** ***Provide GIS shape files for all project components as identified below.*** The PEA Checklist has as requirement to provide GIS (or equivalent) data layers for the Proposed Project preliminary engineering including estimated locations of all physical components of the Proposed Project as well as those related to construction. The following information appears to be missing from the GIS files and is necessary to support the environmental review and analysis: • The locations of fiber optic/OPGW communication cables • Boundaries of the Chicarita, San Luis Rey, Encina (and/or Encina Hub, if different), Palomar Energy, and Mission Substations • Conductor paths that would be bundled between the project corridor and San Luis Rey Substation • Work areas for duct and vault trenching • Temporary work area limits for structure removal sites R20, R23, R24, R25, R30, R34, R36, R39, R40, R42, R43, R44, R46, R52, R62, R63, R66, R67, and R68. • SDG&E ROWs and Franchise Areas • Cultural survey data (included in the confidential appendix to the cultural resources survey report, but not in GIS layers)

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
8	Section 3.3.5, page 3-23	**Section 3.5.4 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding substation modifications** ***Provide plan and profile views of existing substations and proposed modifications.*** The PEA Project Description provides a description of proposed modifications to the Sycamore and Peñasquitos substations; however, plan and profile views illustrating these modifications were not provided. Please provide the plan and profile views.
9	Section 3.4.1, page 3-41	**Section 3.7.1.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding vegetation clearance** ***Please provide details regarding vegetation clearing for project access, and all work areas, staging areas and yards, and maintenance areas.*** Vegetation types are included in the GIS files. However, additional details are required, as specified in the PEA Checklist, in order to perform biological and visual resources analyses: A. Describe what types of vegetation clearing may be required (e.g., tree removal, brush removal, flammable fuels removal) and why (e.g., to provide access, etc.). B. Describe how each type of vegetation removal would be accomplished. C. For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal. D. Describe the types and approximate number and size of trees that may need to be removed. E. Describe the type of equipment typically used.
10	Section 3.4.3, page 3-34	**Section 3.7.2.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding pole installation and removal** ***Identify whether or not shoo-fly poles will be required to maintain customer electrical service during construction. If required, provide the number of shoo-fly poles, their location, dimensions of impact areas at each location, estimated duration of installation/use of shoo-fly poles, a description of stringing methods proposed for shoo-fly construction/disassembly and indication if helicopters would be used, and restoration details proposed at shoo-fly locations/disturbed areas. In addition, shoo-fly locations should also be included in GIS data (see comments under GIS Data above).*** The PEA Project Description identifies that service interruptions are not anticipated and that line outages would be coordinated to maintain system reliability; however, no details were provided as to how this would be achieved. Line outages and distribution underbuild is usually protected through the use of shoo-flys. Please provide the information listed above so that impacts to utilities and services can be addressed in the EIR.

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#	**PEA Section(s)/ Page #**	**Deficiency**
11	Section 3.4.11.2, Table 3-11	**Section 3.7.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding workforce and equipment** ***Identify the number of each vehicle and piece of equipment that would be used and the number of workers that would be present during each proposed work activity.*** The PEA Project Description lists standard equipment that would be used, the general duration of work for work activities, and the general number of workers that may be present; however, the number of vehicles, equipment, and workers present for individual work activities was not provided. Please provide this information.
12	Section 3.8, page 3-50	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding minimizing fire hazards** ***Provide a copy of the project-specific fire prevention plan.*** The PEA Project Description identifies that a draft fire prevention plan has been prepared for the project, but it was not included in the PEA. Please provide the fire prevention plan.
13	Section 3.8, page 3-54	**Section 3.5.3.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding cable pole screening** ***Provide preliminary design details for screening of cable poles from adjacent roadways.*** The PEA Project Description identifies that "final design of the eastern and western cable poles will consider design measures, such as landscaping installed outside of new perimeter chain-link fencing, decreased pole diameters, or increased setback from adjacent roadways, to reduce the visibility of each structure." The description is too general and more detail is needed to assess the visual impacts. Please provide preliminary design details for screening of cable poles that specifies the pole and the proposed screening method.
Aesthetics		
14	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding KOPs** ***Provide information on the camera used to capture the KOPs.*** Data on the camera used for the analysis was not provided but is needed to assess the accuracy of the simulations. Please provide the following data for photographs used at each of the key observation points. 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

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
15	Section 3.8, page 3-50; Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations** ***Provide locations and details for the proposed marker balls.*** Figure 4.1-5, 4.1-7, and 4.1-13 of the PEA's Aesthetics Section shows new marker balls (aerial marking) on the shield wires. The U.S. Department of Transportation Federal Aviation Administration Advisory Circular 7-/7460-1K discusses marker balls as it relates to the potential of perceived visual intrusion: *They should be recognizable in clear air from a distance of at least 4,000 feet…* All 3 KOPs appear to be less than 0.75 mi. (4000 feet) from the marker balls. Yet the analysis of the KOPs after project implementation states they would be "barely visible". Please reevaluate your 3D modeling to confirm the balls are the proper size and render the simulations accordingly. Please provide a preliminary assessment of required marker balls and lighting including the size, color, and total number per segment. Include a map that shows the location and extents of the marker balls that are required. Provide any correspondence with the Federal Aviation Administration and the Department of Defense regarding the need for marker balls or hazard lighting on the transmission line towers or the shield wires.
16	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations** ***Please provide a simulation showing an angle structure. Provide an elevation drawing with a side by side comparison of angle and tangent structures to assist the reader understand the differences in magnitude.*** Angle poles are typically more robust than tangent structures; therefore, they are more conspicuous to the visual receptor. Please provide a simulation showing an angle structure. The KOP from Hilltop Park would be good vantage point to demonstrate their mass. It will also serve as an excellent example of how stringing site will appear after vegetation removal.
Air Quality and Greenhouse Gases		
17	Appendix 4.3-A, Tables A-27 and A-28	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Update Table A-27 to include helicopter emissions for Segment C or update Table A-28 to exclude helicopter emissions for Segment C for 2016.*** Table A-27 (unmitigated emissions) includes helicopter emissions for Segment C in 2016 and D in 2017. Table A-28 (mitigated emissions) excludes helicopter emissions for Segment C in 2016 and D in 2017. Please update the tables so that Segments C and D contain the correct elements in both tables for 2016 and 2017, respectively, or provide an explanation for the apparent discrepancy. Please update Table 4.3-8 to account for changes in emissions calculations, if necessary.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
18	Appendix 4.3-A, Tables A-32 and B-9	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide unmitigated operational air pollutant emissions.*** Only mitigated operational emissions appear to be provided (Tables A-32 and B-9). Unmitigated operational emissions should be provided, or please clarify that mitigated and unmitigated operational emissions are the same, if that is the case.
19	Appendix 4.3-A, Table B-5	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide GHG emissions calculations for 2017 or clarify the contents of Table B-5.*** Table B-5 (which is also used for Table 4.3-10 in the text of the PEA) is labeled as containing emissions for 2016 only. Construction would also occur in 2017. Please provide GHG emissions calculations for 2017, or clarify that Table B-5 (and 4.3-10) contains all construction emissions from 2016 through 2017.
20	4.3.4.2, Table 4.3-8, pages 4.3-22 through 4.3-23	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding estimates for air quality emissions** ***Provide PM10 and PM2.5 emissions for helicopter operations or explain why PM10 and PM2.5 emissions for helicopter operations are excluded.*** Table 4.3-8 does not contain PM_{10} and $PM_{2.5}$ emissions for helicopter operations, even though helicopter operations would result in emissions of PM_{10} and $PM_{2.5}$. Further, Appendix 4.3-A, Tables B-4 and A-26, do not provide these calculations. Appendix 4.3-A , Tables B-4 and A-26, and Table 4.3-8 should be updated to include helicopter PM_{10} and $PM_{2.5}$ emissions, or please explain why such emissions were excluded.
21	4.3.4.8, page 4.3-31	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide an operation and maintenance GHG emissions summary table.*** An emissions summary table is not provided for operation and maintenance GHG emissions. Please provide a summary of the GHG emissions for operations and maintenance.
Biological Resources		
22	Section 4.4.4, Page 4.4-39 and 4.4-40	**Sections 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding biological resource surveys** ***Provide survey results for spring/early summer blooming special-status species.*** The PEA states that "…because the application submittal deadline for the Proposed Project would occur prior to the spring survey period, focused surveys that target spring/early summer blooming special-status plant species could not be conducted prior to application submittal." Please provide updated spring/early summer survey results.

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#	**PEA Section(s)/ Page #**	**Deficiency**
23	Biological Technical Report, Appendix 4.4-A, Figures 5, 9, 11, 12, & 13	**Sections 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding survey results and potential impacts for all work areas including staging areas and access routes** ***Provide survey results and impacts for all proposed staging areas including the Carmel Mountain staging yard, Carmel Valley Road staging yard, and the Torrey Santa Fe staging yard, which were not addressed in the PEA.*** The Biological Technical Report (and the PEA) did not include biological surveys and impact assessments for all of the proposed staging areas. These staging areas were also not addressed in the wetland delineation report. In addition, there are several access routes located outside of the mapped project study area that require biological surveys and an assessment of potential impacts associated with "re-establishing" existing access roads. Please provide survey results and impacts for all proposed staging areas/yards.
Cultural Resources		
24	Section 4.5.2.3, Page 4.5-2	**Sections 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys** ***Provide survey results for all staging areas.*** The PEA states that "Only two of the five staging areas, Stonebridge and Stowe, were surveyed due to access limitations." The other three staging areas need to be surveyed, as the data are required to evaluate the potential impacts of staging. In addition, there are several access routes located outside of the mapped project study area that require cultural surveys and an assessment of potential impacts associated with "re-establishing" existing access roads. Please provide the survey data and results for all staging areas and access roads.
25	Section 4.5.2.3, Page 4.5-2	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys** ***Provide copies of the previous reports that were relied upon for their survey results (i.e., Williams and Cordova 2012 and Bowden-Renna 2012).*** The Williams and Cordova (2012) and Bowden-Renna (2012) survey reports results were used for the PEA analysis. Areas surveyed in previous projects as described in these reports were not resurveyed. Since the previous surveys are being relied upon for the analysis of this project, please provide these reports so that survey locations and methods can be evaluated.
26	Section 4.5.4.2, Page 4.5-20	**CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 5.5, Cultural Resources)** ***In accordance with the outcome of the Madera Oversight Coalition v. County of Madera case, substantial evidence must be provided demonstrating that known sites that have not been evaluated for their eligibility can be avoided, or if they cannot be avoided, they must be evaluated for their eligibility for listing in the NRHP/CRHR so that the results can be included in the EIR analysis.*** The case of Madera Oversight Coalition

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#	**PEA Section(s)/ Page #**	**Deficiency**
		v. County of Madera,199 Cal.App.4th 48 (2011) involved an EIR that identified certain archaeological resources as historic resources, noted that the project would have a significant impact on said resources, and imposed a mitigation measure requiring, among others, further verification that those resources were indeed historic resources. The court overturned the EIR in this regard finding that this measure constituted an impermissible deferral of analysis since environmental decisions would be made outside an arena where public officials would be accountable. Along those lines, the court noted that "[n]either CEQA nor the Guidelines authorize any mechanism or procedure for undoing an EIR's conclusion that an archaeological site is an historical resource." The court also noted that the measure violated CEQA Guidelines § 15064.5(c) (1), which requires a lead agency to first determine whether a site is a historic resource when a project will impact an archaeological site. The PEA states that nine of the proposed pole/work area locations are in the vicinity of 14 identified cultural resources that have not been evaluated for their eligibility under the NRHP or CRHR. The PEA states that these 14 sites are being assumed to qualify as "historical resources" as defined by CEQA. The analysis also states that "The current design is far enough from the cultural resources locations that no direct impacts should occur, with the implementation of APMs CUL-1 through CUL-6." Not enough information is provided to validate this conclusion. The APMs include monitoring and development and implementation of a Research Design and Data Recovery Program to mitigate for any resources discovered during construction, which seems to indicate some potential for these 14 cultural resources to be impacted by the project construction. More information must be provided to show whether the project would or would not impact each of these sites (i.e., how far away is the site and from what type of construction activity, what type of site is it, what is the likelihood for associated buried sites that could be directly impacted). For all sites where there may be impacts, a very definitive statement of eligibility is needed. In some cases, this determination may not require more fieldwork, but simply requires a clear analysis of why these sites are not eligible. For other sites, though, more information is needed to either dismiss site eligibility, or to design site-specific data recovery strategies for mitigation. In some cases, this may require subsurface shovel testing within the impact areas to confirm whether anything is present below the surface, to determine what types of materials are there, and to assess whether the impact areas contain deposits with integrity. Due to the Madera case described above, the EIR will need to provide substantial evidence to support the conclusions as to whether the proposed project would significantly impact cultural resources. The administrative record will need to document that standard and thorough investigations were carried out to determine whether there are any such eligible resources impacted. Please propose an approach and a schedule for providing this information.

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#	**PEA Section(s)/ Page #**	**Deficiency**
Geology and Soils		
27	Section 4.6.2, page 4.6-2	**Section 5.6 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding site-specific geologic information.** ***Provide the geotechnical reports prepared for portions of the project alignment.*** Section 4.6 states that there are four existing geotechnical reports that have been prepared for SDG&E for other projects that cover portions of the project alignment (Benton Engineering Inc. 1972a and 1972b; Geocon Inc. 2012a and 2012b). Please provide these reports to the CPUC so that the impacts related to geologic hazards and soils can be assessed.
Hazards and Hazardous Materials		
28	Section 4.7	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding construction of new transmission line 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 the new transmission line. Provide analysis related to the potential effects on any existing buried gas pipelines (whether the project will cause corrosion of nearby pipelines or create a hazard for construction workers or the public). Quantify the potential induced current and interference in any adjacent buried pipelines.*** Transmission line construction involves subsurface excavation for pole and tower foundations and may interfere with existing subsurface features. Substantial evidence is needed to demonstrate that the project will not create a hazard for construction workers and the public during installation of the poles and towers and operation of the power line. Evidence is required to determine the potential for induced current and interference in adjacent buried pipelines and that the project would not cause corrosion or safety hazards. Identify the distance from the transmission line alignment to any and all existing buried pipelines and describe the methods used to determine safe operational distances, as appropriate.
29	Section 4.7.3.3, page 4.7-9	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding hazardous materials** ***Provide a complete list of the types of hazardous materials anticipated to be used during project construction and maintenance and operation.*** The PEA includes a partial list of hazardous materials anticipated to be used during project construction. The subsection does not list any hazardous materials anticipated to be used during project maintenance and operation. Provide a list of the hazardous materials that would be used during construction and maintenance and operation.

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#	**PEA Section(s)/ Page #**	**Deficiency**
30	Section 4.7	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding blasting activities** ***Clarify whether blasting would be used during any aspect of project construction. Provide additional information on blasting-related procedures.*** The Project Description and Section 4.7 state that blasting may occur during project construction. Blasting agents are hazardous and also could present a hazard of injury or property damage if improperly handled. Please provide information on what portions of the project area would potentially be subject to blasting activities and the distance of these areas from the public, including residences and other receptors such as schools. Please provide additional descriptions of the appropriate best management practices (BMPs) that would be used before, during, and after all project-related construction activities to prevent erosion and off-site sedimentation during blasting activities.
Hydrology and Water Quality		
31	Section 4.8.3.1, page 4.8-3	**Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding drainage crossings** ***Provide additional details on the locations of drainage crossings and how drainage crossings would be constructed to avoid impacts to state and federal jurisdictional waters.*** The PEA states that drainage crossings may be used wherever feasible or necessary. Please provide the proposed locations of drainage crossings based on the results of the jurisdictional determination. Please describe how the drainage crossings would be constructed and quantify the wetland and waterway impacts.
32	Section 4.8	**Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding water use** ***Provide the estimated volume of water that would be required for project maintenance and operation. Identify the source of this water.*** Water would be required for landscaping irrigation and site restoration following completion of project construction. The amount of water that would be required for project operation is not included in the PEA. The source of the water is required to evaluate potential impacts to groundwater and municipal supplies. Provide an estimate of the amount of water required for project operation and from where the water would be obtained.
Land Use and Planning		
33	N/A	**Section 5.9 of the PEA Checklist and Section V(14, 15) of the Information and Criteria List regarding adjacent parcels** ***Provide the GIS data of all parcels within 300 feet of all project areas including APN number, mailing address, and parcel physical address.*** This data set was not identified in the GIS information submitted. Please make

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		sure that the 300 feet includes all nearby residences, staging areas, and access routes. In instances where the 300 feet cuts thru a cul-de-sac neighborhood, please expand the 300 feet to account for all properties located along the cul-de-sac.
Noise		
34	4.10.4.2 (Question 10a)	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise** ***Provide noise generation levels that take into account construction noise combined with existing ambient noise levels listed in Table 4.10-5.*** The PEA provides measured ambient noise levels at ten locations in the project area in Table 4.10-5. The analysis presented under Question 10a only provides noise levels generated by typical construction equipment and does not provide ambient noise levels resulting from project noise combining with the existing ambient noise levels. Please provide noise generation levels that include existing ambient noise levels.
35	4.10.4.2, page 4.10-5	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise** ***Provide estimated noise levels generated by rock blasting.*** The PEA states that rock blasting would reduce impacts, with noise being intermittent and short in duration. The PEA does not, however, provide an estimate of the potential noise level generated by rock blasting. Please provide estimated noise levels generated by rock blasting.
36	4.10.4.3, page 4.10-7	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise** ***Provide a list of "ordinary construction restrictions to ensure that any blasting activities comply with applicable laws, regulations, and ordinances" that would reduce impacts to less than significant.*** There is no list of the restrictions and no analysis of how the restrictions would reduce blasting impacts to less than significant. Further, the measure listed in Section 3.8, page 3-55, refers only to preparation of noise and vibration calculations and not to any specific minimization measures. Please provide the construction restrictions for blasting.
Transportation		
37	Section 4.14.4.2	**Section 5.15 of PEA Checklist and Section V (14) of the Information and Criteria List regarding traffic impacts on roads** ***Provide a traffic management plan that includes discussion of traffic impacts on SR 56 and I-15 due to installation of conductor over roadway.*** The PEA does not analyze the impact that the proposed project may have on traffic on HWY 56 and I-15. The project discussion mentions on page 3-42 that when overhead lines cross larger roads, such as SR 56 and I-15 Caltrans may require certain measures to control traffic. Please describe the methods that

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies		
#	**PEA Section(s)/ Page #**	**Deficiency**
		SDG&E would implement to control traffic (e.g., stringing at night or other protection methods).
38	Section 4.14.4.2	**Section 5.15 of PEA Checklist and Section V (14) of the Information and Criteria List regarding vehicle counts during construction to assess traffic impacts** ***Provide a table that shows the maximum trips generated during construction of each segment, broken down by trip type (e.g., material or equipment delivery, worker vehicle). Provide the methods used to generate those numbers.*** The PEA describes generally that increased traffic volumes would be low, but does not give specific traffic volumes generated during construction of each project segment. Please provide clarification on the method used to generate vehicle trips.
Other Data Needs		
39	N/A	**Chapter 7 of the PEA Checklist and Section V(15) of the Information and Criteria List regarding parcel data** ***Provide an excel spreadsheet with parcel data for all parcels within 300 feet of the project including APN number, mailing address, and parcel physical address.*** Please make sure that the 300 feet includes all nearby residences and all parcels that may be affected by the project (e.g., around staging sites, access routes, and cul-de-sac neighborhood streets).