

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 13, 2017

Ms. Jennifer Kaminsky  
San Diego Gas and Electric Company  
1010 Tavern Road  
Alpine, CA 91901

**RE: CPUC Data Request #2 for Minor Project Refinement Request #8 (SXPQ-10362-ENV-TR)**

Dear Ms. Kaminsky:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed an initial review of Minor Project Refinement Request (MPR) #8 submitted by San Diego Gas & Electric Company (SDG&E) on September 12<sup>th</sup>, 2017 for the Sycamore-Peñasquitos 230-kV Transmission Line Project.

At this time, the CPUC requests additional information regarding MPR#8 in order to determine the extent of environmental impacts associated with the proposed additional temporary work areas. Information request is contained in the data request table below. Please note that we may have additional information requests as our review of MPR#8 proceeds.

#	Data Request #2 for MPR #8
1	<p><b>Provide access route alternatives that avoid mapped road pools in order to also avoid potential impacts to San Diego Fairy Shrimp, consistent with EIR Mitigation Measure Biology-6. Alternative access routes are required for access to pole Z479050, and guard structures GS-22 and GS-23. Documentation of road pool survey results for alternative access routes must be provided in addition to figures and kmz files depicting proposed alternative routes on an aerial image base.</b></p> <p>MPR #8 indicates that construction access and work would occur when site conditions are dry, and would avoid road pools for 72 hours following a rain event. MPR #8 also indicates that any ponded pools would be avoided, should that condition occur. This is not consistent with the EIR analysis, which identifies potential impacts in dry conditions as well as in wet conditions, resulting from vehicles crushing fairy shrimp cysts.</p> <p>Mitigation Measure Biology-4 contains several requirements to assure impacts remain less than significant, including avoidance wherever feasible or wet season surveys to determine if vernal pool indicator species are present, and wet season surveys to determine if San Diego fairy shrimp are present. If neither vernal pool indicator species or fairy shrimp are found, then the road pool can be impacted without further mitigation; otherwise, adequate mitigation must be secured before road pool impacts can be authorized.</p>
2	<p><b>Confirm that the proposed work space impacts to vernal or road pools are accurately depicted in the vernal pool mapping provided, particularly at or near poles Z479047 and Z479048. Provide revised mapping illustrating revised work space limits if impacts where these impacts were not intended. The extent of individual pool watersheds should be included on updated maps and also avoided in the establishment of work spaces and access</b></p>

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	routes at or near poles Z479047, Z479048, Z479046, and Z479043.
3	Provide representative photographs of all vernal pools and road pools in or adjacent to proposed work spaces and access routes.
4	Identify any logistical constraints and timing requirements for the activities proposed in the MPR #8 request relative to the anticipated project in-service date of June 2018.

Please direct questions related to this review to me at (415) 703-2168 or [billie.blanchard@cpuc.ca.gov](mailto:billie.blanchard@cpuc.ca.gov).

Sincerely,



Billie Blanchard  
Project Manager  
Energy Division, CEQA Unit

cc: Lonni Maier, CPUC Supervisor CEQA Unit  
Jason Reiger, CPUC Attorney Legal Division  
Jeff Thomas, Panorama Environmental  
Sheila Hoyer, Panorama Environmental