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July 7, 2014

SENT BY ELECTRONIC DATA TRANSFER

Billie Blanchard  
Project Manager  
Energy Division, CEQA Unit  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**Re: Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (A.14-04-11)  
ED-Def1-SDGE 06/18/14 Partial Response No. 2  
Energy Division Deficiency Report 1, Dated May 6, 2014**

Dear Ms. Blanchard:

Thank you for the California Public Utilities Commission's careful review of the Proponent's Environmental Assessment (PEA) for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (Proposed Project). SDG&E appreciates the Commission's ongoing review of Partial Response No. 1, prepared by San Diego Gas & Electric Company (SDG&E) to address Energy Division Deficiency Report 1. SDG&E has enclosed Partial Response No. 2 which completes SDG&E's response to the Deficiency Report 1, dated May 6, 2014.

SDG&E respectfully requests that the Commission deem the Application complete and begin scoping for the Proposed Project, which is critical for electric reliability in the San Diego region. The PEA, Partial Response No. 1, and Partial Response No. 2 provide more information than is required under the Commission's PEA Checklist and its Information and Criteria List. The Commission is currently well positioned to determine whether to prepare an Environmental Impact Report (EIR) or Negative Declaration. In fact, SDG&E understands that the Commission has decided to prepare an EIR for the Proposed Project. There is no reason to delay deeming the Application complete and issuing a Notice of Preparation of an EIR.

The California Independent System Operator's Functional Specification for the Proposed Project requires an in-service date of May 2017. SDG&E is committed to meeting this tight timeline to ensure electric reliability. SDG&E is also committed to facilitating the

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Commission's thorough environmental review of the Proposed Project under the California Environmental Quality Act (CEQA). SDG&E is therefore available throughout the environmental review process to respond to any data requests for the Proposed Project.

SDG&E notes that some of the details requested by the Commission are not yet available but are not required by CEQA to deem the Application complete. Specifically, the Commission has requested detailed information about future potential Federal Aviation Administration notification requirements under Deficiency Report Item 15 and underground utilities that may be located within or near the project area under Deficiency Report Item 28. The attached response provides all the information that is currently available, and SDG&E will forward the final studies, reports or agency notifications upon completion. No significant changes to the Proposed Project or its potential impacts are anticipated as a result of the forthcoming details.

Thank you for reviewing SDG&E's Partial Response No. 2 and for considering SDG&E's request to deem the Application complete and begin project scoping. SDG&E looks forward to working with the Commission to ensure that environmental review for the Proposed Project complies with CEQA and provides the analysis needed to approve this critical electric reliability project.

Sincerely,



Bradley S. Carter  
Project Manager  
San Diego Gas & Electric Company

Enclosures

cc: with enclosures:

Mary Jo Borak, California Public Utilities Commission, Infrastructure Permitting and CEQA  
Nicolas Chaset, California Public Utilities Commission, Interim Advisor to Commissioner Picker  
Farzad Ghazzagh, California Public Utilities Commission, Office of Ratepayer Advocates  
Darryl Gruen, California Public Utilities Commission, Legal Division  
Molly Sterkel, California Public Utilities Commission, Infrastructure Planning and Permitting  
Charlotte Terkeurst, California Public Utilities Commission, Interim Chief of Staff to  
Commissioner Picker  
Jeff Thomas, Panorama Environmental Project Manager  
Hallie Yacknin, California Public Utilities Commission, Administrative Law Judge

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**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 14-04-011 Deficiencies			
#	PEA Section(s)/ Page #	DEFICIENCY	SDG&E RESPONSE
<b>A. Project Description</b>			
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	<p><b>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</b></p> <p><i>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.</i></p> <p>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</p>	Provided within Response No. 1 dated June 18, 2014.

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		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 to 3-20; Section 3.3.6.3, Table 3.8, Page 3-25	<p><b>Section 3.7.2.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding conductor installation</b></p> <p><i>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 Junction to the Mission Substation) and substations located outside of project corridor.</i> 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.</p> <p>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.</p>	Provided within Response No. 1 dated June 18, 2014.

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3	Section 3.4.1.1, Page 3-26; Section 3.4.6.6, Page 3-41	<p><b>Section 3.7.1.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding access road preparation</b></p> <p><i>Clarify activities involved in the reestablishment (also referred to as "smoothing or refreshing") of existing access roads. Identify which access roads will be reestablished.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
4	Section 3.4.1.2, Page 3-27	<p><b>Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding maintenance pad preparation</b></p> <p><i>Provide locations and a thorough description of retaining walls to be constructed for maintenance pads.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
5	Section	<b>Section 3.7.1.2 of the PEA Checklist and Section V(11) of the</b>	Due to further design, analysis and review, SDG&E has identified the following

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	3.4.1.6, Page 3-29; Section 3.4.6.4; Section 3.4.7, Page 3-41; Appendix 3-B	<p>Information and Criteria List regarding work area locations</p> <p><i>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.</i> 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 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.</p>	<p>revisions to guard structures within the original PEA:</p> <p><b><u>Segment A</u></b></p> <p>Additional guard structures are anticipated at the following locations:</p> <ul style="list-style-type: none"> <li>• On the span between structures E3 and P3/R3 exiting Sycamore Canyon Substation, temporary guard structures will be used to protect existing 69-kV power lines exiting the substation. The guard structures are anticipated to be a boom or bucket truck parked on existing road at the northwest corner of the substation; and a boom or bucket truck parked on the existing spur road approximately 150-ft. south of P3.</li> <li>• At the Scripps Poway Parkway crossing (span between structures P16/R16 and P17/R17), add a temporary guard structure, anticipated to be a boom or bucket truck, in the road median.</li> <li>• At East Village Drive crossing (span between structures P17/R17 and P18/R18), add temporary guard structures on the east and west side of the street behind the sidewalk. The guard structures are anticipated to be 3-pole H-frames approximately 70-ft. across.</li> <li>• At Ivy Hill Drive crossing (span between structures P19/R20 and P20/R21), add temporary guard structures on the east and west side of the street behind the sidewalk. The guard structures are anticipated to be 3-pole H-frames approximately 70-ft. across.</li> <li>• Approximately 600-ft. south of P24, it is anticipated that a boom truck or bucket truck will be located on the existing access road to protect a distribution line crossing the right-of-way.</li> </ul>

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			<ul style="list-style-type: none"> <li>• At the Poway Road crossing (span between structures P24/R26 and P25/R27), add a temporary guard structure, anticipated to be a boom or bucket truck, in the road median.</li> </ul> <p>Regarding the crossing of Angelique Street (span between structures P12/R12 and P13/R13), guard structures are not anticipated. Due to the configuration, location and elevation of the existing and new structures on either side of the road, there is minimal risk of wire falling on the road during removal and stringing activities. It is expected that a traffic control flagger will be stationed along the road to observe wire stringing activities and stop traffic temporarily if necessary.</p> <p>Due to further design, analysis and review, the following guard structures should be moved from their previously mapped locations:</p> <ul style="list-style-type: none"> <li>• Move GS3 from the west side to the east side of Stonecroft Terrace</li> <li>• Move GS24 from north side to south side of the I-15 off ramp</li> <li>• Move GS46 from north side to median of Carmel Valley Road</li> </ul> <p>The temporary guard structures in this segment are anticipated to primarily be 3-pole H-frames with a width of approximately 70-ft. In most instances, this configuration will require increasing the width of the originally mapped guard structure locations to approximately 100-ft. Boom or bucket trucks in this segment will be moved approximately 100-ft. to remain under wires being installed or removed. At the Scripps Poway Parkway crossing, the boom or bucket trucks located in the median and on the north side of the road will need to travel approximately 200-ft to remain under the wires.</p>



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			<p><b><u>Segment C</u></b></p> <p>Due to further design, analysis and review, additional guard structures have been identified for the following locations:</p> <ul style="list-style-type: none"> <li>• On the span between wire stringing site SS11 and P42, add a temporary guard structure on the north side of Carmel Valley Road behind the sidewalk. The guard structure is anticipated to be a 2-pole H-frames approximately 35-ft. across.</li> <li>• At the SR-56 crossing (span between structures E4 and E5), add temporary guard structures in the median and on the south side of the east bound lanes. The guard structures are anticipated to be 2-pole H-frames approximately 35-ft. across.</li> </ul> <p>The temporary guard structures in this segment are anticipated to be either 2-pole H-frames with a width of approximately 35-ft., boom trucks or bucket trucks. The previously mapped locations depict the approximate width required for the guard structures.</p> <p><b><u>Segment D</u></b></p> <p>No additional guard structures are anticipated for this segment, however, the previously mapped location of GS48 should be moved east approximately 100 ft. It is anticipated that the temporary guard structure at this location will consist of a boom or bucket truck parked in the western southbound lane and bike lane. The other temporary guard structure in this segment, GS48, is also anticipated to be a boom or bucket truck. The width covered by these guard structures will be approximately 100-ft.</p>



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			The location and type of temporary guard structures may vary depending on the final design; and Caltrans and the City of San Diego requirements. In addition, guard structures, traffic control and other measures will be used in order to restrict pedestrian and vehicle access to areas below lines being removed or installed.
6	Section 3.4.1.5, Page 3-29; Appendix 3-D	<p><b>Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding work area locations</b></p> <p><i>Identify the temporary work area limits for proposed structure removals.</i> 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.</p>	<p>New structure work areas were previously shown in the PEA, Appendix 3-B, Detailed Route Map.</p> <p>The temporary work areas for structure removals are located within the existing work pads, which are typically approximately 35 feet by 75 feet in size. Typically, the area required to remove existing poles does not require additional space. For the approximately 19 pole removal sites that do not occur within the anticipated work area for a new structure, it is assumed that the pole removal activities will be confined to the existing operation and maintenance work pad and therefore would not create any new or additional impacts. Similar to the existing access road network, these work pads are maintained clear of vegetation and sufficiently graded/leveled to support maintenance vehicles. GIS data for these 19 removal sites is not available.</p>
7	N/A	<p><b>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</b></p> <p><i>Provide GIS shape files for all project components as</i></p>	<p>a) The location of the fiber optic/OPGW communication cables will occur in the approximate same location as the new installed 230 kV transmission line along (1) Segment A, from Sycamore Canyon Substation to Structure No. P41 within Black Mountain Ranch Community Park, along (2) Segment C from Structure Nos. P42 to P43, and along (3) Segment D, from Structure No.</p>

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		<p><i>identified below.</i> 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:</p> <ul style="list-style-type: none"> <li>a) The locations of fiber optic/OPGW communication cables</li> <li>b) Boundaries of the Chicarita, San Luis Rey, Encina (and/or Encina Hub, if different), Palomar Energy, and Mission Substations</li> <li>c) Conductor paths that would be bundled between the project corridor and San Luis Rey Substation</li> <li>d) Work areas for duct and vault trenching</li> <li>e) 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.</li> <li>f) SDG&amp;E ROWs and Franchise Areas</li> <li>g) Cultural survey data (included in the confidential appendix to the cultural resources survey report, but not in GIS layers)</li> </ul>	<p>P43 to the Penasquitos Substation. These locations are shown in the PEA Appendix 3-B, Detailed Route Map.</p> <ul style="list-style-type: none"> <li>b) Boundaries of the listed substations have been previously submitted (see Response No. 1 submitted on 6/18/14).</li> <li>c) Conductor bundling will not be required outside of the Proposed Project alignment and substation boundaries.</li> <li>d) The detailed engineering for duct and vault trenching along Carmel Valley Road (Segment B) is ongoing, and GIS Shaprefiles for the current, updated route for Segment B are attached.</li> </ul> <p>Trenching operations would typically be staged in intervals so that a maximum of approximately 300 to 500 feet of trench would be left open at any one time or as allowed by permit requirements. The typical trench dimensions for installation of the duct bank would be a minimum of 6 feet deep and 3.5 feet wide and the required workspace would be approximately 30 feet wide.</p> <ul style="list-style-type: none"> <li>e) See Response No. 6, above.</li> <li>f) GIS files (<b>Confidential</b>) are attached for SDG&amp;E ROWs and Franchise Areas.</li> <li>g) The <b>Confidential</b> Cultural Survey Data (GIS files) is attached.</li> </ul>
8	Section 3.3.5, page 3-23	<b>Section 3.5.4 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding substation modifications</b>	The <b>Confidential</b> plan and profile view of the existing substations (Sycamore Canyon and Peñasquitos Substations) are attached.

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		<p><i>Provide plan and profile views of existing substations and proposed modifications.</i> 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.</p>	
9	Section 3.4.1, page 3-41	<p><b>Section 3.7.1.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding vegetation clearance</b></p> <p><i>Please provide details regarding vegetation clearing for project access, and all work areas, staging areas and yards, and maintenance areas.</i> 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:</p> <ul style="list-style-type: none"> <li>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.).</li> <li>B. Describe how each type of vegetation removal would be accomplished.</li> <li>C. For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.</li> <li>D. Describe the types and approximate number and size of trees that may need to be removed.</li> </ul>	Provided within Response No. 1 dated June 18, 2014.

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		E. Describe the type of equipment typically used.	
10	Section 3.4.3, page 3-34	<p><b>Section 3.7.2.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding pole installation and removal</b></p> <p><i>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).</i></p> <p>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-flies. Please provide the information listed above so that impacts to utilities and services can be addressed in the EIR.</p>	Provided within Response No. 1 dated June 18, 2014.
11	Section 3.4.11.2,	<b>Section 3.7.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding workforce and</b>	The attached table provides an estimated number of workers, vehicles and equipment associated with the activities described in the PEA. The equipment

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	Table 3-11	<p><b>equipment</b></p> <p><i>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.</i> 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.</p>	list is provided on Table 3-11 on pages 3-43 and 3-44 of the PEA; and the schedule for these activities is summarized in Table 3-12 on pages 3-44 and 3-45. The actual number of workers, vehicles and equipment will be dependent on the final design, mitigation measure requirements, construction schedule, crew sizes, equipment availability and the contractor's means and methods.
12	Section 3.8, page 3-50	<p><b>Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding minimizing fire hazards</b></p> <p><i>Provide a copy of the project-specific fire prevention plan.</i> 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.</p>	The preliminary draft project fire plan is attached.
13	Section 3.8, page 3-54	<p><b>Section 3.5.3.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding cable pole screening</b></p> <p><i>Provide preliminary design details for screening of cable poles from adjacent roadways.</i> The PEA Project Description identifies that "final design of the eastern and western cable poles will consider design measures, such as landscaping</p>	Provided within Response No. 1 dated June 18, 2014.

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		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.	
<b>B. Aesthetics</b>			
14	Section 4.1	<p><b>Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding KOPs</b></p> <p><i>Provide information on the camera used to capture the KOPs.</i>            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.</p> <ul style="list-style-type: none"> <li>A. Camera make and model</li> <li>B. Film size or digital sensor dimensions</li> <li>C. Lens make and model</li> <li>D. Focal length used for each image</li> <li>E. GPS camera location</li> </ul>	Provided within Response No. 1 dated June 18, 2014.
15	Section 3.8, page 3-50;	<p><b>Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations</b></p>	For the purposes of the visual impact assessment and visual simulations included within the PEA, Table DR 15 contains the spans that were assumed to require marker balls. The spans assumed to require marker balls were derived from the

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	Section 4.1	<p><b>Provide locations and details for the proposed marker balls.</b> 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: <i>They should be recognizable in clear air from a distance of at least 4,000 feet...</i> 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.</p> <p>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.</p>	<p>span height above ground and by the presence of marker balls on existing facilities adjacent to the proposed project alignment.</p> <p>SDG&amp;E and its consultant(s) are currently completing detailed engineering which includes review and analysis of all proposed structures and spans to determine FAA notification requirements.</p>
16	Section 4.1	<p><b>Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations</b></p> <p><i>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</i></p>	<p>Provided within Response No. 1 dated June 18, 2014.</p>



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		<i>understand the differences in magnitude.</i> 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.	
<b>C. Air Quality and Greenhouse Gases</b>			
17	Appendix 4.3-A, Tables A-27 and A-28	<p><b>Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions</b></p> <p><i>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.</i> 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.</p> <p>Please update Table 4.3-8 to account for changes in emissions calculations, if necessary.</p>	Provided within Response No. 1 dated June 18, 2014.
18	Appendix 4.3-A,	<b>Section 5.3 of the PEA Checklist and Section V(14) of the</b>	Provided within Response No. 1 dated June 18, 2014.

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	Tables A-32 and B-9	<p><b>Information and Criteria List regarding air quality emissions</b></p> <p><i>Provide unmitigated operational air pollutant emissions.</i> 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.</p>	
19	Appendix 4.3-A, Table B-5	<p><b>Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions</b></p> <p><i>Provide GHG emissions calculations for 2017 or clarify the contents of Table B-5.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
20	4.3.4.2, Table 4.3-8, pages 4.3-22 through 4.3-23	<p><b>Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding estimates for air quality emissions</b></p> <p><i>Provide PM10 and PM2.5 emissions for helicopter operations or explain why PM10 and PM2.5 emissions for helicopter operations are excluded.</i> Table 4.3-8 does not contain PM<sub>10</sub> and PM<sub>2.5</sub> emissions for helicopter operations, even though</p>	Provided within Response No. 1 dated June 18, 2014.

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		helicopter operations would result in emissions of PM <sub>10</sub> and PM <sub>2.5</sub> . 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 <sub>10</sub> and PM <sub>2.5</sub> emissions, or please explain why such emissions were excluded.	
21	4.3.4.8, page 4.3-31	<p><b>Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions</b></p> <p><i>Provide an operation and maintenance GHG emissions summary table.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
<b>D. Biological Resources</b>			
22	Section 4.4.4, Page 4.4-39 and 4.4-40	<p><b>Sections 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding biological resource surveys</b></p> <p><i>Provide survey results for spring/early summer blooming special-status species.</i> 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</p>	The Special-Status Plant Survey Summary Report has been attached.

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		survey results.	
23	Biological Technical Report, Appendix 4.4-A, Figures 5, 9, 11, 12, & 13	<p><b>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</b></p> <p><i>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.</i> 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.</p>	<p><b>Staging Yards</b></p> <p>The staging yards are potential sites and may or may not be utilized for the Project, depending upon the availability at the time of construction. The Stonebridge and Stowe Staging Yards have been surveyed for biological, cultural and aquatic resources and the results were previously submitted. While all of the potential staging yard locations have been surveyed for sensitive cultural resources, the staging yards identified (Carmel Mountain, Carmel Valley Road, and the Torrey Santa Fe) were not surveyed during the time period for the biological surveys.</p> <p>All of the identified potential staging yards occur within pre-disturbed graded areas with no biological resources or wetlands anticipated to be present, thus there would be no potential for biological impacts. Additionally, the potential staging yard locations were chosen to avoid sensitive resources based on the fact that they have been utilized for past projects.</p> <p><b>Access Roads</b></p> <p>The Proposed Project alignment is located within existing SDG&amp;E utility corridors that have existing, currently used and maintained SDG&amp;E access roads to all Project structure and work areas, except for approximately one new spur road. These existing roads are considered part of the existing environment. The <b>Confidential</b> GIS files of the Proposed Project’s anticipated access roads are provided. SDG&amp;E regularly maintains its access road network, has previously surveyed all access roads, and is aware of the locations of sensitive resources. Due to the existing maintained access road network along the Proposed Project</p>

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			<p>alignment, new or re-established roads are not anticipated to be required. Some access roads will require refreshing and/or may require enhancement to provide safe construction access. Although not anticipated, re-establishment may be required due to site conditions during construction (see Question No. 3 of the Data Response No. 1 submitted on 6/18/14 for a description of “refreshing” and “re-establishment” activities described within).</p> <p>Additionally, construction activities may require the utilization of existing, non-SDG&amp;E access roads or bare dirt areas. The full extent of these roads cannot be known during preliminary engineering, however, some existing non-SDG&amp;E access roads that could be utilized during construction have been included within the attached <b>Confidential</b> Access Road GIS Shapefiles. To clarify, there are four types of roads that could be utilized for the Proposed Project: (1) SDG&amp;E roads that would require refreshing activities; (2) SDG&amp;E roads that may require re-establishment activities; (3) SDG&amp;E roads that may require enhancement; and (4) non-SDG&amp;E roads.</p> <p>Use of existing access roads that occur outside of the mapped project study area would be required to meet the following qualifications to ensure no impacts to sensitive resources occur:</p> <ol style="list-style-type: none"> <li>1. The access road is an existing road consisting of bare ground, gravel or disturbed (creation of new access roads is not included).</li> <li>2. Project activities on the access road are limited to driving and parking.</li> <li>3. No enhancement, re-establishment or refreshing activities that include ground disturbance (grading, smoothing, etc.) would occur, i.e., the road would be used in its current state.</li> </ol>

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<b>E. Cultural Resources</b>			
24	Section 4.5.2.3, Page 4.5-2	<p><b>Sections 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys</b></p> <p><i>Provide survey results for all staging areas.</i> 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.</p>	<p>The staging yards have been surveyed and are included in the Williams and Cordova 2012 report.</p> <p><b>Access Roads</b></p> <p>The existing SDG&amp;E maintained roads have been previously surveyed for cultural resources, and any portion of the existing roads that intersect known cultural resources are identified as “Arc Avoids”. Arc Avoids are buffered areas depicted on project plans that are created and maintained by SDG&amp;E’s Cultural Resources Program to ensure avoidance measures are in place during all construction and operations and maintenance activities along SDG&amp;E existing access roads. No enhancement, re-establishment or refreshing activities are anticipated to occur on access roads within the vicinity of sensitive cultural resources (see response to Question No. 23 above). Additionally, no impacts are anticipated to occur during the use of access roads, or during refreshing activities. In the event that refreshing activities are required in the vicinity of cultural resources, a preliminary survey would take place and a cultural monitor would be present to ensure avoidance, thus no impacts would occur.</p>
25	Section 4.5.2.3, Page 4.5-2	<p><b>Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys</b></p> <p><i>Provide copies of the previous reports that were relied upon</i></p>	<p>Provided within Response No. 1 dated June 18, 2014.</p>

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		<p><i>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.</i></p>	
26	Section 4.5.4.2, Page 4.5-20	<p><b>CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 5.5, Cultural Resources)</b></p> <p><i>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.</i> The case of Madera Oversight Coalition 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</p>	<p>Of the 14 total archaeological resources identified in the PEA, 5 of them have already been evaluated. The remaining 9 resources were further documented in the Cultural Resources Inventory and survey of the Project footprint for this response. A total of 14 project features are proposed within or adjacent to these 9 resources. A CRHR Evaluation Plan (refer to <b>Confidential</b> attachment) was prepared by Petra Resources Management (PRM) to address the nine resources, including slope analysis to predict likelihood for buried deposits, landform identification in relation to each specific project components, and a summary of the condition of each resource including previous archival studies that have been completed. In summary, the CRHR Evaluation Plan was prepared to address each of the 14 feature locations of the project that are in proximity to the nine cultural resources. Of the nine resources reported in the records search, six of these were either not identified during the recent survey or are contained within a topographically different landform than the proposed facilities, thus no impacts would occur (refer to <b>Confidential</b> attachment).</p> <p>A limited testing program (refer to <b>Confidential</b> attachment) at the remaining three resources, CA-SDI-11,910, CA-SDI-18,278 and CA-SDI-18,437, was</p>



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		<p>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.</p> <p>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.</p> <p>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</p>	<p>conducted on June 20, 2014 by PRM to ascertain if a subsurface component exists at the site which could result in a recommendation of eligible for listing on the California Register of Historical Resources (CRHR). The three archaeological sites were previously recorded during preconstruction surveys for the Project, which consists of six proposed facilities at these three locations. To address the three resources, PRM hand-excavated a series of shovel test pits (STP) within the proposed facilities and adjacent access roads to determine if subsurface CRHR-eligible deposits are present.</p> <p>Based on the results of the testing, CA-SDI-11,910, CA-SDI-18,278 and CA-SDI-18,437 were found not eligible for listing on the CRHR under any criteria. Based on the completed fieldwork and analysis, it is recommended that the entirety of these sites be determined not eligible based on these findings and circumstances, and that their destruction due to creation of the proposed work areas will have no effect on a CRHR-eligible historic property. Therefore no further cultural resources work is recommended at these locations.</p> <p>Both the CRHR Evaluation Plan and the testing results letter report prepared by PRM are being submitted as <b>Confidential</b>.</p>

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		<p>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.</p> <p>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.</p>	
<b>F. Geology and Soils</b>			
27	Section 4.6.2, page 4.6-2	<p><b>Section 5.6 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding site-specific geologic information.</b></p> <p><i>Provide the geotechnical reports prepared for portions of the project alignment.</i> Section 4.6 states that there are four</p>	Provided within Response No. 1 dated June 18, 2014.

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		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.	
<b>G. Hazards and Hazardous Materials</b>			
28	Section 4.7	<p><b>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</b></p> <p><i>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.</i> 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</p>	<p><b><u>Utility Location Methodology</u></b>  As part of detailed engineering, the proposed right-of-way is researched by SDG&amp;E to identify the location and type of underground utilities. This utility research is done to locate any underground utilities that may conflict with the proposed structure locations; and identify any metallic pipe utilities that may require additional study to determine potential induction and/or conduction impacts. This information is obtained through records research, desktop reviews, field verification, and utility location services (e.g. DigAlert). Identification of utilities is typically an on-going effort throughout design and construction.</p> <p><b><u>Local Utility Coordination</u></b>  To minimize the risk of impacting underground utilities during foundation excavation and other earthwork activities, SDG&amp;E or their contractor will notify the appropriate utility location service in accordance with state law to locate and mark underground utilities prior to construction. SDG&amp;E will also coordinate with cable, telecommunications, City of San Diego, San Diego County and other service providers to determine if affected utilities need to be relocated or protected in place during construction.</p>

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		<p>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.</p>	<p><b><u>Compliance with Applicable Codes</u></b>  SDG&amp;E takes safety of its contractors and the general public very seriously and will take the necessary precautions in areas where existing buried utilities are identified in close proximity to the Proposed Project. First and foremost, SDG&amp;E will comply with all applicable code requirements to maintain clearances to these utilities. The applicable codes include the National Electric Code (NEC), Occupational Safety and Health Administration (OSHA), American Petroleum Institute (API), and other applicable Federal Regulations.</p> <p><b><u>Project Specific Underground Utility Analysis</u></b>  As part of the detailed engineering and site specific factors, buried metallic pipelines in close proximity to the right-of-way, which will be determined by SDG&amp;E's consultant, will be evaluated to determine what impact, if any, the Proposed Project poses to the facility. Given the fact that the Proposed Project traverses heavily urbanized areas along portions of the proposed route, completion of this survey will take a substantial amount of time.</p> <ul style="list-style-type: none"> <li>• <b><u>Segment A</u></b>  At this time and based on preliminary desktop research, the most substantial metallic underground utility that has been identified under the overhead transmission line is a 16" SDG&amp;E gas pipeline that crosses the existing right-of-way approximately 88 ft. south of proposed structure P28.</li> </ul> <p>Based on historical information and industry standards, at a voltage of 230 kV the</p>

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			<p>proposed line would need a significant parallelism to the pipeline for induction to be of concern. The existing 16" SDG&amp;E gas pipeline identified does not parallel the proposed line but rather crosses the right-of-way at an angle of approximately 60 degrees (30 degrees less than perpendicular). Therefore, potential induction issues are not foreseen at this time.</p> <p>A more detailed study is required to fully determine if impacts exist. Due to the proximity of the existing structure to the pipeline that crosses the right-of-way, conduction will also be evaluated. This study may include:</p> <ol style="list-style-type: none"> <li>1. Desktop and field research on metallic pipeline information including size and type, coating type and resistance and pipe depth below the ground.</li> <li>2. Subsurface investigation to determine soil resistivity in areas with close proximity to buried metallic pipelines.</li> <li>3. Final design components including: structure type and dimensions, conductor ground clearance, grounding details, electrical phasing details, steady state maximum loading, and fault study providing maximum fault current at the closest structure(s) to the pipeline.</li> <li>4. Model and analyze the AC interference effects from high voltage electric transmission circuits to the buried metallic gas lines in the area. This analysis will take into account existing cathodic protection systems that the pipelines are currently using to prevent pipeline corrosion. It will also determine whether AC mitigation methods are required for the pipeline to reduce inductive and conductive effects to the pipelines for</li> </ol>

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			<p>personnel safety and pipeline integrity.</p> <ol style="list-style-type: none"> <li>5. Identification of AC voltage and current parameters that would cause safety hazards to construction workers and the general public. AC mitigation methods will be outlined for safety of construction workers and the general public including grounding methods and monitoring of induced AC voltage levels on these metallic structures during construction.</li> <li>6. Analysis report will include minimum separation distances between the transmission line structures and all existing buried metallic pipelines and outline the methods used to determine these separation distances.</li> </ol> <p>It is important to note that if the above analysis yields a determination that the metallic pipe is impacted by the Proposed Project, a variety of different technologies exist to eliminate or minimize potential issues in this localized area. This may include but not be limited to cathodic decoupling devices, deep ground rods, and gradient control mats. SDG&amp;E will implement the proper technologies to maintain safety during construction and long term operation of the transmission line.</p> <ul style="list-style-type: none"> <li>• <b><u>Segment B</u></b>            In order to minimize any impact to existing trees, the route has been slightly adjusted south of the median, away from the trees. Throughout the entire span, there is no concern regarding damaging or inducing current on any gas utilities, as no metal gas pipelines are being paralleled or crossed.</li> </ul>

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			<p>The following non-metallic gas utilities are being crossed:</p> <ol style="list-style-type: none"> <li>1. Just east of Via Abertura, as the trench initially enters Carmel Valley Rd., a 4” plastic gas line is being crossed.</li> <li>2. A 2” plastic gas line is being crossed at the Mona Lane intersection.</li> <li>3. A 3” plastic gas line is being crossed on the east side of the Torrey Del Mar Drive intersection.</li> <li>4. A 6” plastic gas line is being crossed on the east side of the Chadamy Way intersection.</li> <li>5. A 6” plastic gas line is being crossed on the east side of the Camino Del Sur intersection.</li> <li>6. A 6” plastic gas line is being crossed east of the Black Mountain Rd. intersection.</li> </ol> <p>The average depth for these gas utilities is 3.5 ft and the proposed 230 kV package will be approximately 2 ft below the bottom of each crossing gas line.</p> <p>The following non-metallic gas utility is being paralleled:</p> <ol style="list-style-type: none"> <li>1. There is a small portion of the trench that runs parallel to a polyethylene gas line; however, there is a minimum distance of approximately 10’ between the center of the trench to the center of this gas line.</li> </ol> <p>In regards to the other non-metallic utilities located along Segment B, the average depths are as follows:</p>



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			<ul style="list-style-type: none"> <li>• Water – 4.8 ft</li> <li>• Sewer – 10.4 ft</li> <li>• Electric/Communication – 4.5 ft</li> <li>• Storm Drain – 13.4 ft</li> </ul> <p>SDG&amp;E’s standard vertical separation is 2 ft minimum on gas and water crossings and 1 ft minimum on all other utilities. This information is based on preliminary engineering and is subject to change based on final engineering.</p> <ul style="list-style-type: none"> <li>• <b><u>Segment C</u></b> No underground metallic utilities have been identified at this time along Proposed Project Segment C.</li> <li>• <b><u>Segment D</u></b> No underground metallic utilities have been identified at this time along Proposed Project Segment D.</li> </ul>
29	Section 4.7.3.3, page 4.7-9	<p>Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding hazardous materials</p> <p><i>Provide a complete list of the types of hazardous materials anticipated to be used during project construction and maintenance and operation.</i> The PEA includes a partial list of hazardous materials anticipated to be used during project construction. The subsection does not list any hazardous</p>	Provided within Response No. 1 dated June 18, 2014.

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		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.	
30	Section 4.7	<p><b>Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding blasting activities</b></p> <p><i>Clarify whether blasting would be used during any aspect of project construction. Provide additional information on blasting-related procedures.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.

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<b>H. Hydrology and Water Quality</b>			
31	Section 4.8.3.1, page 4.8-3	<p><b>Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding drainage crossings</b></p> <p><i>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.</i></p> <p>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.</p>	<p>To avoid the need for an Army Corps of Engineer Section 404 permit, Regional Water Quality Control Board 401 certification or California Department of Fish &amp; Wildlife Section 1602 Streambed Alteration Agreement, the following measures would typically be applied:</p> <p>When an access road crosses through a jurisdictional drainage feature, driving through the drainage is allowed. However conducting work activities, parking of vehicles, staging of equipment, or the placement of fill of any sort, including steel plates, is not allowed within drainage features without acquiring appropriate State and Federal Aquatic Resource permits.</p> <p>If it becomes necessary to place a temporary bridge over a jurisdictional drainage during construction, the bridge would be placed over the drainage, spanning the channel from bank to bank, avoiding the Ordinary High Water Mark (OHWM). Minor vegetation trimming may be required during placement of the bridge. An Aquatic Resource monitor shall be present to provide guidance to the work crew during placement and removal of the bridge to avoid substantial impacts to the drainage.</p> <p>To avoid substantial impacts to jurisdictional drainages, vehicle crossing shall be avoided during periods of high flow. After a storm event, vehicles shall not cross jurisdictional drainages during a dry out period of 24 hours, or as recommended by the Aquatic Resource monitor after reviewing conditions of the drainage.</p>

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			A map is attached showing the approximate locations of current drainage crossings.
32	Section 4.8	<p><b>Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding water use</b></p> <p><i>Provide the estimated volume of water that would be required for project maintenance and operation. Identify the source of this water.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
<b>I. Land Use and Planning</b>			
33	N/A	<p><b>Section 5.9 of the PEA Checklist and Section V(14, 15) of the Information and Criteria List regarding adjacent parcels</b></p> <p><i>Provide the GIS data of all parcels within 300 feet of all project areas including APN number, mailing address, and parcel physical address.</i> This data set was not identified in the GIS information submitted. Please make sure that the 300 feet includes all nearby residences, staging areas, and access routes. In instances where the 300 feet cuts thru a cul-</p>	Based on previous discussions, CPUC to address.

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		de-sac neighborhood, please expand the 300 feet to account for all properties located along the cul-de-sac.	
<b>J. Noise</b>			
34	4.10.4.2 (Question 10a)	<p><b>Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise</b></p> <p><i>Provide noise generation levels that take into account construction noise combined with existing ambient noise levels listed in Table 4.10-5.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
35	4.10.4.2, page 4.10-5	<p><b>Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise</b></p> <p><i>Provide estimated noise levels generated by rock blasting.</i> 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</p>	Provided within Response No. 1 dated June 18, 2014.

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		levels generated by rock blasting.	
36	4.10.4.3, page 4.10-7	<p><b>Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise</b></p> <p><i>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.</i> 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.</p>	Provided within Response No. 1 dated June 18, 2014.
<b>K. Transportation</b>			
37	Section 4.14.4.2	<p><b>Section 5.15 of PEA Checklist and Section V (14) of the Information and Criteria List regarding traffic impacts on roads</b></p> <p><i>Provide a traffic management plan that includes discussion of traffic impacts on SR 56 and I-15 due to installation of conductor over roadway.</i> 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</p>	<p>Traffic Management/Control Plans will be developed by SDG&amp;E and approved by Caltrans prior to the start of construction for the SR 56 or I-15 locations where the conductor crossing over the roadway. Compliance with Caltrans approved Traffic Management/Control Plan and permit conditions will ensure that significant traffic impacts are avoided. Typical measures that could be included within the Traffic Control Plan(s) to reduce impact at these location included:</p> <ul style="list-style-type: none"> <li>All traffic control plans will be developed, reviewed and approved by the authority having jurisdiction of the specific roadway being impacted</li> </ul>

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		traffic. Please describe the methods that SDG&E would implement to control traffic (e.g., stringing at night or other protection methods).	<p>(CalTrans). Traffic control plans will include vehicular and non-vehicular traffic.</p> <ul style="list-style-type: none"> <li>• Typically, for overhead transmission construction, traffic will be temporarily stopped when the sock line is flown over the SR 56 and I-15 highway crossings.</li> <li>• Guard structures will be used on both sides of conductor crossings at the SR 56 and I-15 locations during the entire duration of stringing operations at that particular section of the project. Netting may be installed between the guard structures.</li> <li>• Traffic would be stopped in the event that an external load, such as a structure section, was being flown over a public road including the SR 56 and I-15 highway crossings. The temporary stops will be no more than a few minutes, and as stated above, all traffic control plans will be approved by the appropriate governing agency. Due to the short duration of temporary traffic stops, level of service is not anticipated to be significantly affected and no significant impacts to traffic would occur.</li> </ul>
38	Section 4.14.4.2	<p><b>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</b></p> <p><i>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.</i> The</p>	Refer to attached Table DR 38 for construction trips. Construction trips were generated from preliminary engineering estimates of construction support staff.



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		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.	
<b>L. Other Data Needs</b>			
39	N/A	<p><b>Chapter 7 of the PEA Checklist and Section V(15) of the Information and Criteria List regarding parcel data</b></p> <p><i>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.</i> 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).</p>	See Question and Response 33.