

**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses
A.15-09-013 Proposed Pipeline Safety & Reliability Project (Proposed Project)
California Public Utilities Commission (CPUC) Deficiency/Data Request 02– December 30, 2015**

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
1.1-2	General - GIS Data		Provide GIS data for the entire SDG&E/SoCalGas natural gas transmission system within SDG&E's service area. This can be on a web site that is password protected to maintain security.	Update the confidential GIS website provided to include attribute data. At minimum, the attribute data must include pipeline diameter and identification number (e.g., 16 inch, Line 1600) for every pipeline. Also, this site needs to be available for as long as the proceeding is open at the CPUC. Did SDG&E/SoCalGas establish a site expiration date?	SDG&E and SoCalGas (herein referred to as "Applicants") have updated their geographic information system (GIS) website to include pipeline location and pipe attribute data for the Applicants' backbone transmission assets within SDG&E's service area. The website will be available for as long as this proceeding is open at the CPUC and the Applicants will provide the Energy Division a link and login via email by February 19, 2016. The pipe location and pipe attribute information is highly sensitive/confidential and is provided pursuant to California Public Utilities Code (P.U. Code) Section 583 and General Order (GO) 66-C.
1.1-4	Agency Involvement: Project Description / MCAS Miramar	p. 1-4, 3-68, 3-70, 3-72 (Table 3-9)	Provide the status of the reimbursement agreement with MCAS Miramar.	Update provided by the Applicants but agreement not signed.	Marine Corps Air Station (MCAS) Miramar has informed the Applicants that they will address the appropriate funding mechanism once a National Environmental Policy Act (NEPA) coordinator has been put in place by MCAS Miramar. It is the Applicants' understanding that MCAS Miramar will determine the funding mechanism, whether it will be through a reimbursement agreement or some other means.
1.1-6	Agency Involvement: Project Description / MCAS Miramar	p. 1-4, 3-68, 3-70, 3-72 (Table 3-9)	Provide SDG&E/SoCalGas's anticipated timeline for MCAS Miramar management approval to act as Lead Agency under NEPA. CPUC discussions with MCAS Miramar's Antoinette Perez indicate that acceptance of the Final Tier 1 Application is anticipated to occur before the end of the year. The next step would be to seek management approval of the MOU/MOA with the CPUC for environmental document preparation. Their approval process will include MCAS Miramar management review and approval of the Tier 1 Application and MOU. It appears that this is likely to occur early 2016.	Acknowledge that the timeline is unknown. Need to know who the lead agency is before scoping. Lead agency also needs to review the PEA.	The Applicants acknowledge that the timeline for a Memorandum of Understanding/Memorandum of Agreement (MOU/MOA) between CPUC, MCAS Miramar and potentially the California Department of Transportation (Caltrans) is unknown to the Applicants. The Applicants are not a party to the inter-agency agreement but have provided the necessary information and documentation to MCAS Miramar and have been informed by MCAS Miramar and CPUC staff that MCAS Miramar is currently awaiting approval by Marine Corps Installations Command (MCICOM) to execute the MOU/MOA. The Applicants are also aware that MCAS Miramar staff have reviewed a draft MOU/MOA and provided comments directly to CPUC staff. The Applicants do not believe that any question exists that MCAS Miramar will act as Lead Agency under NEPA and anticipates that MCICOM approval to execute the MOU/MOA will occur in due course.
1.1-8	Agency Involvement: Project Description / Caltrans / Alternatives	p. 1-4, 3-68, 3-70, 3-72 (Table 3-9), 4.16-3	Discuss the possibility of a reimbursement mechanism similar to the one in process with MCAS Miramar for Caltrans to take an active role early in the EIR/EIS process to help ensure that the document meets their permitting requirements. It is anticipated that Caltrans may be a signatory on the MOU with Miramar. Caltrans met internally about this project on 10/23/15. The CPUC will follow up with Ann Fox, Amy Vargas, and Bruce April at Caltrans as soon as possible to further discuss the MOU.	Further discussions required.	The Applicants anticipate entering into a reimbursement mechanism with Caltrans and recently provided Caltrans with a draft reimbursement agreement.
1.1-9	Agency Involvement: Project Description / Caltrans /	p. 1-4, 3-68, 3-70, 3-72 (Table 3-9), 4.16-3, Ch 5	a. FHWA delegated NEPA responsibility to Caltrans in 2012 (see http://www.dot.ca.gov/hq/env/nepa). Discuss the possibility of Caltrans acting as the Lead Agency under NEPA. About 20 miles of the proposed 47-mile pipeline would generally follow the alignment of U.S. Route 395 (PEA cites Old Hwy 395) and Interstate 15. U.S.	Further discussions required.	As indicated in the Applicants' Response to the Application Completeness Determination submitted to Energy Division on November 30, 2015 (November 30, 2015 Response), the Proposed Project is not under the jurisdiction of Caltrans.

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
	Alternatives		Route 395, Interstate 15, and several other State Routes would be crossed. 41 miles of the pipeline would be installed within roadways and road shoulders. About 3.5 miles of the pipeline would cross land within MCAS Miramar. b. Confirm whether U.S. Route 395 is a federal/state roadway or if it is now under county jurisdiction and not federal/state jurisdiction along the entire alignment of the proposed pipeline.	LLG confirmed that U.S. Route 395 is under County jurisdiction.	
1.1-14	Agency Involvement: Project Description / USFWS	p. 1-4, 1-5	Provide a contact list of the USFWS representative(s) contacted by SDG&E/SoCalGas and Insignia. Provide the contact letters or point to the location in the PEA where these are located. The PEA states on p. 1-5 that no comments from USFWS about the proposed project have been received.	No consultation letters submitted or comments received to date.	In their November 30, 2015 Response, the Applicants provided Exhibit D: Response to 1.1-14 and 1.4.4-4, which documents all correspondence with the United States (U.S.) Fish and Wildlife Service (USFWS) to date. The response indicated that Stacey Love (Recovery Permit Coordinator, USFWS Carlsbad Office) had been notified in advance of protocol-level surveys. In addition, maps of the survey corridor were provided to the USFWS via email. On January 12, 2016, the Applicants met with representatives of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), USFWS, and California Department of Fish and Wildlife (CDFW) to provide an overview of the Proposed Project and discuss the PEA findings regarding the potential impacts to aquatic resources. On January 26, 2016, the Applicants met with representatives of the CDFW and USFWS to provide an overview of the Proposed Project and discuss the PEA findings regarding the potential impacts to biological resources. The USFWS representatives were Patrick Gower and Udara Abeysekera. A copy of the sign-in sheets with contact information is included as Exhibit GG: Response to 1.1-14. Coordination with the USFWS will continue throughout the California Environmental Quality Act (CEQA) and permitting processes.
1.1-15	Agency Involvement: Project Description / CDFW	p. 1-4, 1-5	PEA Section 1.4 does not indicate that CDFW has been contacted. Please explain. If CDFW has been contacted, provide a contact list of the CDFW representative(s) contacted by SDG&E/SoCalGas and Insignia regarding the proposed project and contact dates. Update PEA Section 1.4 with and a discussion of these contacts.	No consultation to date.	As discussed in the Applicants' November 30, 2015 Response, no coordination with the CDFW had been initiated as of November 30, 2015. On January 12, 2016, the Applicants met with representatives of USACE, RWQCB, USFWS, and CDFW to provide an overview of the Proposed Project and discuss the PEA findings regarding the potential impacts to aquatic resources. Additionally, on January 26, 2016, Applicants met with the CDFW and USFWS to discuss the PEA findings regarding the potential impacts to biological resources. The CDFW representatives were David Mayer, Eric Hollenbeck, and Elyse Levy. A copy of the sign-in sheets with contact information is included as Exhibit GG: Response to 1.1-14. Coordination with the CDFW will continue throughout the CEQA and permitting processes.
1.1-16	Agency Involvement: Project Description, Hydrology / USACE, CDFW	p. 1-4, 1-5, Ch. 4, Ch. 5, Table 4.9-2.	Which of the 11 water features identified in Table 4.9-2 are expected to be (1) federal jurisdictional or (2) state jurisdictional? Update Table 4.9-2 with this information.	Provide formal wetland delineation report and data once available.	Results of the formal wetland delineation will be submitted to the CPUC once the fieldwork is complete and the report is finalized. Fieldwork is anticipated to begin in spring 2016.

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
1.1-18	Agency Involvement: Project Description / USACE	p. 1-4, 1-5	Provide a contact list of the USACE representative(s) contacted by SDG&E/SoCalGas and Insignia. Provide the contact letters or point to the location in the PEA where these are located.	No consultation to date.	As discussed in the Applicants' November 30, 2015 Response, no consultation with the USACE had been initiated as of November 30, 2015. On January 12, 2016, the Applicants met with representatives of the USACE, RWQCB, USFWS, and CDFW to provide an overview of the Proposed Project and discuss the PEA findings regarding potential impacts to aquatic resources. A copy of the sign-in sheet with contact information is included as Exhibit GG: Response to 1.1-14. Coordination with the USACE will continue throughout the CEQA and permitting processes.
1.1-19	Agency Involvement: Project Description / SWRCB, RWQCB	p. 1-4, 1-5	Provide a contact list of the SWRCB and RWQCB representative(s) contacted by SDG&E/SoCalGas and Insignia. Provide the contact letters or point to the location in the PEA where these are located.	No consultation to date.	As discussed in the Applicants' November 30, 2015 Response, no consultation with the State Water Resources Control Board (SWRCB) or RWQCB had been initiated as of November 30, 2015. On January 12, 2016, the Applicants met with representatives of the USACE, RWQCB, USFWS, and CDFW to provide an overview of the Proposed Project and discuss the PEA findings regarding potential impacts to aquatic resources. The SWRCB has not been contacted and is not anticipated to be involved in the Proposed Project until immediately prior to the construction phase, when a Notice of Intent (NOI) for the General Construction Storm Water Permit (Water Quality Order 99-08-DWQ) will be submitted. The SWRCB's involvement was discussed briefly with RWQCB staff at the January 12, 2016 meeting, and the RWQCB confirmed that because the Proposed Project is entirely within RWQCB Region 7, SWRCB participation will not be required. The RWQCB representative is listed in Exhibit GG: Response to 1.1-14.
1.1-22	Public Outreach	p. 1-42	a. Provide all 49 polling questions asked. b. Provide the complete report prepared by Competitive Edge Research & Communication and submitted to SDG&E/SoCalGas/Sempra.		The polling questions and report are included as Confidential Exhibit HH: Response to 1.1-22. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.
1.1-23	Public Outreach	p. 1-42	Provide a mailing list in Excel that contains all land owners within 300 feet of the proposed pipeline right-of-way, all federal, state, and local agency contacts (both contacts already made and those anticipated), and updates from returned postcards and additions from the SDG&E open houses and other stakeholder outreach efforts. Group the mailing list by color code or some other clear identifier (e.g., a new column) to identify where the address originated.	Addresses were redacted so we will not be able to mail scoping notices to the stakeholders on your mailing list. Suggest sharing mailing list or SDGE can do the mailing to open house attendees.	An updated mailing list that includes customers within 300 feet of the Proposed Project who received an invitation to open houses is provided in Confidential Exhibit II: Response to 1.1-23. This exhibit also provides a list of the Applicants' stakeholders; however, mailing addresses were not collected from stakeholders because information was provided to them via email. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.
1.2-13	Purpose and Need (Project Objectives) / Alternatives	Ch. 2, 5	Provide an explanation of the increase (spike) in natural gas demand for electric generation on July 2, 2015. Also provide a thorough discussion of this type of event with estimates of how often it has, and is expected to, occur. Include historical data of actual events and the resultant power loss to various types of customers as well as forecast data used to estimate the probability of reoccurrences. See attached slide presented to CPUC Energy Division management on 8/20/15.	See 1.2-6 notes, above	This item requests information regarding the Proposed Project Purpose and Need, which will be addressed in Amended Application. The following response specifically addresses the purpose and significance of the referenced slide. The slide presented to Energy Division management on August 20, 2015 that is referenced in this item depicts a graph of "Solar and Gas Demand on July 2, 2015" in SDG&E's service territory. The purpose of the slide was to facilitate discussion with a broad audience of CPUC staff by

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
					<p>pointing to an illustration of gas demand and solar generation on one summer day. The Applicants do not believe this graph depicts a “spike”; rather, it illustrates the California Independent System Operator Corporation’s (CAISO) “duck curve” phenomenon. Traditionally, customer load demand of the CAISO system changed slowly throughout the day in a cycle that peaked between 3 and 5 PM and reach a minimum around 2 or 3 AM. However, that traditional load curve has been changing, and will continue to change. With the integration of renewable energy generation (e.g., solar and wind), a new pattern is emerging for natural gas-fired electric generation (EG) dispatch. The graph illustrates that the need for natural gas-fired EG exists on a daily basis in the morning. As solar power increases during midday and through the early afternoon, the net load that the CAISO must “follow” by dispatching natural gas-fired EG varies as the solar output increases while electric demand also increases. In the afternoon, solar output flattens out and then starts to decline while electric demand continues to rise, resulting in a very fast “ramp” requirement during which natural gas-fired EG must be quickly and dramatically increased. The magnitude of the duck curve phenomenon is increasing year by year, increasing challenges and reliance on natural gas for fast-ramping EG capability, as solar and other renewables continue being added to the system. Thus, the graph does not show an unusual event, but rather shows the current trend in the need for fast-ramping gas-fired EG. Such need will increase each year as more solar generation comes online.</p> <p>To the best of the Applicants’ recollection, this graph was used in the meeting with Energy Division to illustrate the interdependency and correlation of EG and natural gas demand and to provide a recent example of an actual gas-fired generation ramping pattern and sustained demand for natural gas on one summer day. The graph was also used to illustrate the potential to affect the Applicants’ line pack at night if natural gas demand remains high during the day and night, particularly over the course of multiple days.</p>
1.3-4	Project Description	p. 3-42	<p>Provide a draft blasting plan that describes:</p> <ul style="list-style-type: none"> • the types of blasting that may be used during construction of the proposed project • methods to be used to minimize hole-to-hole propagation • types of explosives/initiation system that may be used • anticipated drill and blast pattern • charge weights and delays • methods for controlling flyrock • selection of blasting products and methods • monitoring, reporting, and controlling ground cracking and displacement • explosives storage and transportation procedures • peak particle velocity monitoring and control • fire prevention 	<p>Preliminary blasting plan to be submitted to CPUC in 6 weeks. Final plan developed in accordance with APM NOI-02, will include conformance to state and local laws related to blasting, including noticing of potentially affected residents and other sensitive receptors. The plan will include a description of the planned blasting methods, an inventory of receptors potentially affected by the planned blasting, a schedule, requirements for noticing and measures to minimize noise related to blasting, and safety precautions to be implemented.</p>	<p>The Applicants submitted their Preliminary Blasting Plan to the CPUC on January 11, 2016.</p>

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
			<ul style="list-style-type: none"> • methods and protocols to protect human health and safety and • APMs to minimize impacts on sensitive receptors, wildlife, aquatic features, and paleontological resources 		
1.4.1-1	Aesthetics	Maps 1-5	<p>Show and label the locations of the visual character photos on project maps at the scale of maps provided as Attachment 3-A (Detailed Route Map). In addition, show and label on these maps the following:</p> <ul style="list-style-type: none"> • County Scenic Highways and other eligible or designated scenic roads; • Scenic vistas identified in the PEA and other scenic features identified in local plans or related documents; • Municipal, county, and other administrative boundaries; • Any trails, parks, or other recreation or open space facilities within 0.5 mile of the proposed ROW; • All locations where mature trees and/or large shrubs will be removed for construction; and all project features for construction or operation. 	<p>County Scenic Highways and other eligible or designated scenic roads are shown with the same symbol and not distinguished clearly from one another on the maps (Exhibit K). Clarify the various designations for scenic roads (i.e., distinguish the various levels of state and county designations) and show these clearly on the maps. Provide a table that shows all of the roads and highways with scenic designations within 3 miles of the proposed project and identify the status of each. It appears that at least some trails, parks, or other recreation or open space facilities within 0.5 mile of the proposed ROW are not shown and labeled on the maps in Exhibit K. Some of the maps do not extend out 0.5 mile from the proposed project. Show and label on the maps the extent of the 0.5-mile buffer and all trails, parks, or other recreation or open space facilities within 0.5 mile of the proposed ROW, work areas, and construction laydown areas. Some of the areas identified as parks on the maps in Exhibit K are not clearly identified (i.e., it's not clear whether these are public parks, public open space areas, or other types of facilities [e.g., SLC on Map 9, Reidy Canyon Creek on Map 20, and Poway Holding and Meadowbrook ER on Map 33]). Clarify the status of all areas identified as parks on the maps in Exhibit K in a table that also references the map number(s) on which the parks or other facilities are shown. Label all major landscape features on the maps in Exhibit K (e.g., San Luis Rey River on Map 8 and various golf courses and other areas of various maps). Provide a key map or maps that show the location and extent of each map in Exhibit K. Need to check with the local jurisdictions to verify that no specific vistas are identified in their general plans.</p>	<p>Exhibit JJ-A: Response to 1.4.1-1 provides an updated map containing the requested revisions. A corresponding table containing all recreation facility names is provided as Exhibit JJ-B: Response to 1.4.1-1 and includes the recreation type, distance from the Proposed Project, and mapbook page number where the facility is located. In addition, Exhibit JJ-C: Response to 1.4.1-1 provides a table that lists the scenic highways within three miles of the Proposed Project, along with the corresponding jurisdiction, scenic highway status, and location. All applicable General Plans have been reviewed for identification of specific scenic vistas.</p>
1.4.1-2	Visual Simulations	Figure 4.1-1	<p>Provide additional visual simulations showing the appearance of the ROW and any other project features 1) immediately following construction and 2) 3-5 years after construction. These additional visual simulations are to be prepared as panoramas to show the context of the views and are to be prepared for the following locations identified below where the grading and vegetation removal would be required. If, for any of these locations, the proposed pipeline would be placed within an existing paved roadway and no existing vegetation removed, an additional visual simulation would not be required for that location.</p>	<p>Key observation point (KOP) character photographs document, which provide photographs and a description of each KOP based on field-gathered observations, were submitted on 12/21/15. A corresponding KOP locations map and kmz files containing points of each photograph location were also provided. These photographs and documents are under review.</p> <p>New visual photographs will be submitted to CPUC. Locations of any additional simulations will be provided in 12 to 14 weeks.</p>	<p>Please see the response to Item 1.4.1-3 below.</p>
1.4.1-3	Aesthetics	p. 4.1-8	<p>Under the heading "Potentially Affected Public Views", the PEA states: "Because the Proposed Project is predominantly located underground, only the aboveground facility locations will be visible to the public." In addition to describing and assessing aesthetic impacts for above-ground project elements, describe the appearance and assess the aesthetic impacts of the proposed ROW for all</p>	<p>The Applicants state that the visual impact will only be temporary because the ROW restoration will be successful in 5 years. That goal is rarely achieved in arid climates. Visual simulations are required for the DEIR illustrating the view at construction, 1 year, 5 years, and 15 years.</p>	<p>The Applicants' November 30, 2015 Response indicated that additional supporting documentation would be provided within three weeks. As planned, a KOP character photographs document, which provides photographs and a description of each KOP based on field-gathered observations, was provided on December 21, 2015. A corresponding KOP locations map and kmz files containing points of each photograph location</p>

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
			locations where grading and vegetation removal and reclamation would occur and the ROW may be visible to viewers from parks, trails, roadways, residential areas, open space areas, and other areas accessible to the general public.		were also provided. On January 21, 2016, the Applicants, Ecology & Environment, Inc. (E&E) and their respective aesthetic resources specialists participated in a teleconference to review the documentation that was submitted on December 21, 2015 and discuss whether any additional visual simulations should be prepared. Three locations were considered, including: 1) Location #3, Photograph #6; 2) Location #9, Photograph #27; and 3) Location #14, Photograph #36. Simulations at 1 year and 3 to 5 years following construction were requested. According to E&E's aesthetic resources specialist, views at 15 years following construction will not be required. Visual simulations at the three locations were requested to be provided to the CPUC prior to initiating the analysis associated with the anticipated Environmental Impact Report/Environmental Impact Statement (EIR/EIS). As discussed with E&E, the submittal of the simulations is not anticipated to affect the Applicants' application completeness determination for the Proposed Project.
1.4.3-4	Air Resources	p. 4.3-16	Construction emissions of PM10, CO, and NOx would exceed the applicable SDAPCD thresholds even after applying the proposed mitigation measures. Other forms of mitigation beyond those already proposed or available in CalEEMod should be considered.	Applicability of the General Conformity Rule, as adopted by the SDAPCD in Rule 1501 (Conformity of General Federal Actions) needs to be evaluated. Present the comparison of estimated emissions with the applicable de minimis thresholds.	San Diego County Air Pollution Control District's (SDAPCD) Rule 1501 only applies to Volatile Organic Compounds (VOC) and nitrogen oxide (NO _x) emissions. The Proposed Project's construction and operation and maintenance emissions were compared to the applicable thresholds identified in SDAPCD's Rule 1501. As indicated in Exhibit KK: Response to 1.4.3-4, the anticipated emissions from the Proposed Project will conform to the limits indicated in Rule 1501. As shown in Table 2: VOC and NOx Construction Emissions of Exhibit KK: Response to 1.4.3-4, controlled construction emissions for VOCs and NOx will be below the applicable 100-ton-per-year threshold. Therefore, with the implementation of the Applicants'-proposed measures (APMs) from the PEA, the Proposed Project will conform to Rule 1501. In addition, only 5.53 percent of the Proposed Project will be located on federal lands; therefore, the proportional emission on federal lands will be far below the threshold.
1.4.4-2	Survey updates	p. 4.4-10	Please provide updated survey results for the arroyo toad at Sites 2 and Site 7.	To be completed March 15 through July 1, 2016.	Updated arroyo toad survey results from Sites 2 and 7 will be provided to the CPUC following completion of the surveys in July 2016.
1.4.4-3	Survey updates	p. 4.4-8	Please provide survey results for the QCB at the Elliot Field Station.	To be completed February 15 through second Saturday in May 2016.	Quino checkerspot butterfly (QCB) survey results at the Elliot Field Station will be submitted to the CPUC following completion of the surveys in May 2016.
1.4.4-4	USFWS	p. 4.4-11	Please provide a summary of communication with the USFWS regarding concurrence of T&E survey results, and pending areas to be surveyed.	Additional surveys may be required upon consultation with USFWS.	The Applicants provided USFWS with an overview of the survey approaches and results on January 12 and 26, 2016. Communication with the USFWS regarding concurrence of threatened and endangered species survey results and pending areas to be surveyed will continue in the coming months.
1.4.4-5	Marine Corps Air Station Miramar	p. 4.4-9	Are additional surveys for the least Bell's vireo and the southwestern willow flycatcher proposed? Will the USFWS accept the 2011 survey results?	Additional surveys may be required upon consultation with USFWS.	Additional surveys for least Bell's vireo and southwestern willow flycatcher on MCAS Miramar are not proposed at this time. The Applicants provided USFWS with an overview of the survey approaches and results on January 12 and 26, 2016. Further communication with MCAS Miramar staff and the USFWS will determine if additional

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
					protocol-level surveys on MCAS Miramar for least Bell's vireo and southwestern willow flycatcher are needed, or if inventory surveys conducted by MCAS Miramar for its Integrated Natural Resources Management Plan will be sufficient.
1.4.4-7	Wetlands and Waterbodies	p. 4.4-32	Provide formal wetland delineation report and data once available. Provide a copy of the Wetland Delineation and supporting documentation (i.e., data sheets). If verified, provide supporting documentation. Additionally, GIS data of the wetland features should be provided.	Data will be submitted by early summer 2016.	Please see the response to Item 1.1-16 above.
1.4.4-8	Wetlands and Waterbodies	p. 4.4-65	Provide additional detail on conceptual mitigation and restoration of temporary impacts to wetlands and waterbodies.	Need to consult with USACE and develop mitigation plan.	The Applicants met with USACE staff to provide an initial high level overview of the Proposed Project and potential impacts to aquatic resources on January 12, 2016. Communications with USACE will continue throughout the review process and conceptual mitigation and/or restoration requirements will be determined once a Nationwide 12 Preconstruction Notification package is submitted to the USACE several months from now.
1.4.4-9	Wetlands and Waterbodies	p. 4.4-32	Discuss construction and restoration methods proposed for crossing wetlands.	Will be updated once consultation with USFWS begins.	As discussed in the Applicants' November 30, 2015 Response, Section 3.6.9 Wetland and Waterbody Crossing Procedures in Chapter 3 – Project Description of the PEA describes the typical waterbody crossing procedures that will be followed during construction of the Proposed Project. The Applicants will notify the CPUC if any different construction methods are required by conditions stipulated in the Nationwide 12 Permit authorization.
1.4.4-11	Wetlands and Waterbodies	p. 4.4-32	Provide a table identifying all wetlands, by milepost and length, crossed by the project and the total acreage and acreage of each wetland type that would be affected by construction.	Will be updated after field work.	As discussed in the Applicants' November 30, 2015 Response, this information is provided in the Wetlands and Waters Assessment, which is included as Attachment C to the Biological Resources Technical Report. The Applicants will update the information and provide it to the CPUC upon completion of the formal wetland delineations.
1.4.5-1	Historic Properties	Section 4.5, Attachment 4.5-A	<p>Recommendation for eligibility to NRHP and CRHR were not made for all of the resources.</p> <p>Guidance by CA SHPO indicates that this is a first step in determining the potential for impacts under CEQA. For instance, if an archaeological site, building, structure, etc. is not considered an historical resource, effects would not be considered significant.</p> <p>This methodology (i.e., lack of identification of historic properties) also would not satisfy the requirements of Section 106.</p> <p>APE does not consider indirect effects (visual, auditory, etc.).</p> <p>Potential for listing not evaluated.</p> <p>The APE was not explained with sufficient detail to understand where evaluation was conducted and why the APE was depicted as being smaller than the surveyed areas. Maps in Appendix A are not entirely clear, although APE is depicted on it.</p> <p>Field methodology is not specific and pertains only to archaeological</p>	<p>This comment has not been fully addressed – per the Applicants, some information is missing, as full surveys will not be completed until a preferred alternative is selected, and government-to-government consultation has begun.</p> <p>In order to be complete, the following still will need to be provided:</p> <ol style="list-style-type: none"> 1. Description of the agreed upon APE (both for evaluating direct and indirect effects) by the SHPO, tribes, and other consulting parties. If agreed to, this will need to show the 1-parcel boundary and the radius, as well as all other areas identified for blasting at minimum. 2. The APE was also inconsistent between information provided to respond to the deficiency request – one document indicated 70 feet and the other 75 feet for the indirect APE radius. Please reconcile difference. 3. Description of field methodology, including both archaeological and historic structures (see below regarding the historic structures report). 	<p>The Applicants' responses for this item are numbered to correspond with the list provided in the CPUC's Request No. 2:</p> <ol style="list-style-type: none"> 1. The Applicants' cultural resource specialist, ASM Affiliates, Inc. (ASM), reached out to the Department of Defense (DoD) and the Office of Historic Preservation (OHP) regarding the direct and indirect Proposed Project area of potential effect (APE). The DoD and OHP agreed that the APE used in the study is sufficient for examining impacts created by the Proposed Project. These indirect and direct APEs are shown on a single set of maps with the results of both surveys and record search reviews, provided as Confidential Exhibit LL-A: Response to 1.4.5-1. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C. 2. The 70 feet and 75 feet inconsistency in the text of the two documents provided in the Applicants' November 30, 2015 Response has been reconciled and will remain 75 feet for indirect atmospheric

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
			<p>remains; nothing done to evaluate potential historic structures. Methodology is missing information on collection/evaluation of artifacts, how sites were delineated, how recording accomplished, etc.</p> <p>A map with mileposts showing the boundaries of all survey areas was not provided.</p> <p>Results of the literature search were provided as tables within Appendix B. Table B2; while indicating the location of all sites, the table does not indicate eligibility or importance of the site locations. Table B3 indicates if outside the survey corridor, but does not indicate location in reference to the APE.</p> <p>To address these deficiencies:</p> <ul style="list-style-type: none"> - Explain why a survey for architectural/built/aboveground resources was not conducted concurrent with the archaeological survey. - Provide information for the NRHP-eligibility of each resource (e.g., NRHP-listed, including NR number and date listed; previously determined NRHP-eligible; previously evaluated and determined not NRHP-eligible; further evaluation or information necessary to determine NRHP-eligibility; unknown; etc.). Without this information for NRHP-eligibility, it will not be possible to suggest management options for these resources under Section 106, NEPA or CEQA. Similarly information for CRHR-eligibility and any local or civic designations (i.e., City of Escondido or City of San Diego) should also be provided. - Confirm that NPS's databases for NRHP-listed historic properties and National Historic Landmarks have been consulted for the project. Include the relevant information for NRHP-listed historic properties and/or properties designated National Historic Landmarks, such as NR numbers and dates listed and/or designated NHLs for management and treatment purposes under Section 106, NEPA and CEQA. For example, the second paragraph of Section 2.5.4 of the CR report suggested that the Luiseno Ancestral Origin Landscape TCP is an NRHP-listed property. A search of National Park Service's (NPS) database confirmed that it was listed in the NRHP on October 30, 2014 (NR # 14000851). Therefore, while this is a Native American resource, it is also a historic property that will need to be addressed for management and treatment purposes under Section 106, NEPA and CEQA. - Provide revised maps that indicate the APE, the survey area, MPs, areas of prior disturbance, etc. - Recognizing that the Applicants are not a federal agency, provide documentation (correspondence, meeting minutes, etc.) that the APE was defined in consultation with the CA SHPO, such that the definition of the APE would be consistent with 36 CFR 800.4(a) (1). 	<ol style="list-style-type: none"> 4. Description of methodology for archaeological field collections and evaluation of artifacts. 5. References to location of resources within the APE (not just within the survey corridor) for Tables B2 and B3. This will also apply to Table B1 (although this was not provided as a revision). 6. NRHP eligibility information was provided as part of the updated Appendix B. However, this appendix will still need to show which resources are located within the APE (direct/indirect) and not just the survey corridor. The survey corridor still is not adequately explained. 7. Table B2 should be double-checked to confirm correct information was included. Some discrepancies were noted in the explanation of resources. (i.e., in final report – P-37-014275 was noted as military property, in revision of Table B2 – noted as trash scatter). 8. Need to know more details about the sites and not just what artifacts were found, such as size of site, potential for listing, condition/state of site, etc. 9. Please make clear that National Historic Landmarks (NHLs) were also evaluated. 10. Make sure to note locations of traditional cultural properties (TCPs) on maps (already marked confidential). May also consider providing any NRHP forms or other documentation for previously identified TCPs. 11. On tables – please include header for each page. 12. The attachment provided as the historic structures survey report needs additional information to document the survey, including photographs, background research, research methodology, clear definitions for the contents of Table 1, findings, recommendations, etc. 13. Maps will need to be revised as new information is acquired by SHPO, tribes, and other consulting parties. New maps will need to be provided to the tribes as part of the consultation packages to show the APE, as well. 14. As indicated by Applicant, new information regarding correspondence will be provided in subsequent versions. As an updated cultural resource report was not provided, no comments can be made as to the recommendations for site eligibility or management options. This will need to be included in subsequent submittals to CPUC. 	<p>and auditory effects.</p> <ol style="list-style-type: none"> 3. The survey methodology was added to the indirect APE report, which is included as Confidential Exhibit LL-B: Response to 1.4.5-1. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C. 4. On January 22, 2016, the Applicants, ASM, E&E, and E&E's archaeologists participated in a teleconference and agreed that the methodology for field collections and evaluation of artifacts will be included in future testing and work plans when those tasks are justified and when the resources requiring evaluation are known. Sampling techniques, in this regard, will be tailored specifically to each resource being reviewed. 5. References to the locations of resources within the APE for Tables B1, B2, and B3 have been provided in Confidential Exhibit LL-C: Response to 1.4.5-1. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C. 6. As a global change to the direct impact APE document, the "Survey Corridor" is now defined as the APE and the previously considered APE is defined as the area of direct impact (ADI). As such, all resources that were previously listed in Tables B1, B2 and B3 as being in the "Survey Corridor" are now considered to be in the APE in the updated tables. 7. It is confirmed that the correct resource listings are in the tables and report. 8. Additional information was added to the site descriptions, as requested, including size, current eligibility status, and condition. 9. The revised report states that NHLs were evaluated. 10. As discussed during the teleconference with the Applicants, ASM and E&E on January 22, 2016, the location and National Register of Historic Places (NRHP) forms for the one TCP identified thus far on the Proposed Project is confidential per an MOU between Pechanga Band of Luiseño Indians and SDG&E. Methods for requesting this data were provided to E&E, who will formally request the documents.

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
					<p>11. A header was added to each page for the Appendix B tables.</p> <p>12. The indirect APE survey report was updated to include photographs, background research, research methodology, clear definitions for the contents of Table 1, findings, and recommendations.</p> <p>13. The maps have been updated to mirror language changes in both survey reports and will continue to be updated and provided as tribal consultation continues.</p> <p>14. The updated cultural resources report for the direct impact APE is provided as Confidential Exhibit LL-C: Response to 1.4.5-1. The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.</p>
1.4.5-2	APE	Section 4.5	<p>The APE was not correctly defined. As stated on page 29 of the Draft CR report, "The Proposed Project's APE was delineated to ensure the identification of significant cultural resources and historic properties that may be directly or indirectly affected by the Proposed Project and that are listed in or eligible for inclusion in the NRHP, the CRHR, or any local ordinances."</p> <p>However, as stated later on page 29 of the Draft CR report, the APE is defined as "areas that could be affected by the maximum extent of the Proposed Project-related ground disturbance, including all construction, all staging areas, and any temporary construction easements."</p> <p>This appears to suggest that the APE has been defined as the areas within which physical impacts and effects as a result of construction are expected, but does not appear to address areas outside the construction footprint, within which visual or auditory impacts and effects as a result of construction or operation may occur; and does not appear to address areas within which indirect and cumulative impacts and effects may occur.^{1,2}</p>	<p>The Applicants will need to make clear what the direct and indirect APEs are. Typically, when this terminology is used, the direct APE is the survey corridor. Additional information will be needed as the consultation continues and is formalized. The APE must be clearly defined as part of the Section 106 proceedings.</p> <p>If a separate survey corridor is used, this must be clearly defined and documented both within the text and within the maps.</p>	<p>As discussed between the Applicants, ASM and E&E during the January 22, 2016 teleconference, the language has been updated in the reports so that "Survey Corridor" will now be defined as the APE and the previous APE will be defined as the ADI. Maps in the attachments have been updated to correspond to this language change. The use of "Survey Corridor" has been removed completely from both documents.</p>
1.4.5-3	Surveys	Section 4.5 and Attachment 4.5-A	<p>This comment recognizes that the Proposed Project consists of a buried pipeline primarily located within or immediately adjacent to existing linear corridors, and that aboveground appurtenant facilities are relatively small and generally in locations with similar existing</p>	<p>As noted in the Applicant's response, additional information will be included as the consultation formally begins. This information will need to be provided to support survey work and findings.</p>	<p>The reports and maps will be updated if changes are agreed upon during tribal consultation conducted by the CPUC and DoD.</p>

¹ 36 CFR 800.2(c) is the regulatory citation that identifies the parties that have consultative roles in the Section 106 process. This is not relevant to the APE. 36 CFR 800.16(d) is the correct regulatory citation that defines "area of potential effects:" "Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

² While "cumulative effects" are not well defined in the regulations for implementing Section 106, 800.5(a)(1) states that "Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative." Additionally, the ACHP's 2013 handbook for integrating NEPA and NHPA compliance requirements indicates that the CEQ regulation definition of cumulative impact is "analogous and instructive."

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
			<p>facilities. However, for the purposes of management and treatment of cultural resources and historic properties under Section 106, NEPA and CEQA there is no explanation for how the appropriate level of effort to identify and evaluate cultural resources and historic properties was determined and why additional investigations, such as an architectural survey or a traditional cultural property survey, were not conducted or needed.</p> <p>To address this deficiency:</p> <p>Provide documentation (correspondence, meeting minutes, etc.) for consultation with the CA SHPO and federally recognized Indian tribes, regarding the type of surveys needed for the Proposed Project, and as appropriate under CEQA, local governments that maintain their own registers of locally significant historic resources.</p> <p>Clarify whether the CA SHPO was consulted regarding the need for a survey or inventory to identify architectural/built/aboveground resources that may be affected by the Proposed Project, such that identification and evaluation efforts would be consistent with 36 CFR 800.4(b) and (c).</p> <p>Clarify whether federally recognized Indian tribes, including but not limited to the Pechanga Band of the Luiseño Indians, were consulted regarding the need for a survey or inventory to identify additional TCPs that may be affected by the Proposed Project, such that identification and evaluation efforts would be consistent with 36 CFR 800.4(b) and (c)</p> <p>Whether such consultation did/did not occur, explain why surveys to identify historic architectural/built/aboveground resources and TCPs that may be visually or auditorily affected by construction or operation of the Proposed Project were not conducted.</p>	<p>Documentation (when received) may consist of formal letters, records for phone calls, emails, etc.</p>	
1.4.5-4	Correspondence	Attachment 4.5-A	<p>Letters and documentation of Native American consultation were provided as Appendix C. Please provide the following:</p> <p>Do not see "areas of concern" from Pechanga on Pages 1-7 (see page 45 of Report/Attachment of 4.5) or any meeting notes.</p> <p>Emails noted in report, but letters are provided – are some forms missing? (e.g., Pala Band of Missouri Indian, Viejas Band of Kumeyaay, and Pauma Band of Luiseno).</p> <p>No documentation of phone calls with Pechanga Band of Luiseno Indians.</p>	<p>Per Applicants, notes were added for the Pechanga. However, as the report itself was not provided as an update, cannot confirm if the discrepancy of what was written and what was provided in the appendix has been revised.</p> <p>As noted by Applicants, additional information will be provided when formal consultations are started.</p>	<p>The updated cultural resources report is provided as Confidential Exhibit LL-C: Response to 1.4.5-1.</p> <p>The exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.</p>
1.4.7-2	Greenhouse Gas Emissions	p. 4.7-8, 4.7-9 Attachment 4.3-A	<p>Tables 4.7-3 and 4.7-4 include GHG emissions estimates for Cold Tie-In and Blowdown operations, respectively. The calculation methods and assumptions for these emissions are not included in Attachment 4.3-A.</p> <p>Provide the methodology, assumptions, and calculations made to estimate GHG emissions from Cold Tie-In construction and blowdown operations.</p>	<p>Provide reference for Table 1: Natural Gas Compound Constants, provided in Exhibit T: GHG Emissions from Natural Gas Releases.</p> <p>Following the methodology explained in Exhibit T: GHG Emissions from Natural Gas Releases, CO2 emissions from pre-lay activities result is ten times lower than the reported value in Table 2 of Exhibit T. Clarify this discrepancy.</p>	<p>The greenhouse gas (GHG) emissions associated with pre-lay activities and presented in Exhibit T: Response to 1.4.7-2 of the Applicants' November 30, 2015 Response include the following three sources: heated vaporizer use, tanker truck use, and the release of natural gas from the pre-lay segment. A more detailed discussion of the calculation methods for each source is presented in Exhibit MM: Response to 1.4.7-2.</p>

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
1.4.7-3	Greenhouse Gas Emissions	p. 4.7-6, 4.7-9	<p>Provide source for the following statement included in page 4.7-6 of the PEA: "SDG&E's overall methane emissions rate, the key component of natural gas, was approximately 0.04 percent of the total delivered through the system in 2013."</p> <p>Clarify if these operational emissions are included in Table 4.7-4. Justify assumptions made for operational GHG emissions.</p>	<p>Provide reference of the report used for "the mileage data and metering/regulatory station count data that were previously reported to the California Air Resources Board (CARB) for the 2013 reporting year."</p>	<p>The Applicants used the mileage data and metering/regulatory station count data from the Subpart W Activity Data Workbook - Section 95157 provided by CARB.</p>
1.4.8-1	Hazards and Hazardous Materials	4.8-30 4.8a	<p>PEA indicates temporary storage sites will be utilized for hazardous materials. Please provide a list of the substances, quantities of each, and largest container size that will be present and the locations of those storage sites. This information is needed to assess the potential impacts of transportation, use, and disposal as well as to evaluate reasonably foreseeable accident and upset conditions.</p>	<p>Applicants to prepare Preliminary Draft Hazardous Materials Business Plan and provide to the CPUC. Applicant to provide volumes and container sizes for hazardous wastes estimated from previous projects. Estimates from the construction contractor will be provided too late in the CEQA/NEPA process.</p>	<p>On a January 22, 2016 teleconference, the Applicants and E&E agreed that a Hazardous Materials Business Plan is not required at this time. E&E's hazardous materials specialist concurred that a list of hazardous materials quantities will satisfy this request. Exhibit NN: Response to 1.4.8-1 lists the substances, example quantities, and uses of hazardous materials to be used and/or stored on site during construction of the Proposed Project.</p> <p>Hazardous materials over the thresholds identified by the County of San Diego Department of Environmental Health are not anticipated to be required during construction; therefore, a Hazardous Materials Business Plan is not anticipated to be required for the Proposed Project at this time. However, if the construction contractor determines that these thresholds will be met or exceeded, a Hazardous Materials Business Plan will be prepared prior to storing hazardous materials over the quantity thresholds on the Proposed Project site.</p>
1.4.8-2		4.8-31 Table 4.8-3	<p>Please provide the quantities of hazardous materials that will be used in the project area during construction and the maximum container size that will be used to store each substance in the project area. This information is needed to evaluate reasonably foreseeable accident and upset conditions.</p>	<p>Applicants to prepare Preliminary Draft Hazardous Materials Business Plan and provide to the CPUC. Applicant to provide volumes and container sizes for hazardous wastes estimated from previous projects. Estimates from the construction contractor will be provided too late in the CEQA/NEPA process.</p>	<p>Please see the response to Item 1.4.8-1 above. The maximum container size that will be used to store hazardous substances in the Proposed Project area is anticipated to be bottled oxygen tanks with 200 cubic feet of capacity.</p>
1.4.16-1	Traffic and Transportation	p. 4.16-21	<p>Impact discussion does not adequately address impacts from construction traffic. Please provide a traffic analysis that determines level of service (LOS) for roadway segments and intersections that are likely to be impacted by construction workers and construction vehicles traveling to and from laydown sites. This analysis should compare changes in LOS to significance thresholds from County of San Diego Guidelines for Determining Significance and Report and Content Requirements; City of San Diego Traffic Impact Manual; and City of Escondido Traffic Impact Analysis Guideline. (i.e., measurable increases in vehicle delay reductions in road speed, changes in volumes/capacity).</p> <p>Please provide methodology for how traffic impacts were analyzed. For example, how was "Potential Temporary LOS Change..." in Table 4.16-5 determined?</p>	<p>The request was for a Level of Service (LOS) analysis of segments and intersections and details showing how the analysis was completed. This is a standard analysis in any traffic study. The traffic analysis prepared by Kimley Horn (9/15/15) contains no LOS analysis for roadway segment or intersections. The only LOS analysis is contained in Table 4.16.5 of the PEA. It is only for segments and it is not clear if it covers all segments where construction will occur. For instance, Section 2.1 of the Kimley Horn traffic study states Champagne Boulevard, Rainbow Glen Road, and Highland Valley Road would have construction along them. They are not analyzed in Table 4.16.5.</p> <p>In addition, Table 4.16.5 does not show the roadway capacity and the with and without construction traffic levels of service, standard components of a LOS analysis table. The attached table shows a typical street segment table that is necessary.</p>	<p>Per the teleconference between the Applicants, E&E and their respective traffic engineers on January 21, 2016, the Applicants have prepared Exhibit OO: Response to 1.4.16-1, which provides the requested LOS analysis.</p>

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
1.4.16-2	Traffic and Transportation	p. 4.16-23	Table 4.16-5 footnote states that peak ADT was calculated assuming all 600 personnel would drive their own personnel vehicles to and from proposed project for an aggregate total of 600 personal vehicle trips. Please clarify if this is 600 round trips (to and from), or if this should be 1,200 personal vehicle trips (one-way). Please provide a trip generation table showing how increase of 254 ADT was calculated. Please provide types of trucks that would be used and clarify if truck trips use a passenger car equivalent factor to account for slower speed and larger size?	Table 4.16-5 adds 254 ADT of traffic to the road system. The only way this can be accurate is if there are 300 personal vehicle inbound trips for a total of 600 personal vehicle trips (300 in and 300 out) and 52 inbound truck trips for a total of 104 truck trips. Are the 300 inbound and 52 inbound amounts accurate? Footnote 1 of Exhibit W states "600 total personnel", not 300 personnel. If there are 600 personnel, that equals to 1,200 ADT (600 personnel in / 600 personnel out). If 600 is a round trip amount, Footnote 1 of Exhibit W should state 75 personnel per crew, not 150.	To clarify, the Average Daily Traffic (ADT) increase was calculated assuming 600 round trips. All vehicle trip calculations were assumed to be round trips (i.e. one outbound leg and one inbound leg). For example, one construction worker driving from his/her home to the Proposed Project site and then driving home from the Proposed Project site is one trip. The methodology was used to be consistent with the air quality analysis and model, which uses the term "trips" to mean a round trip (in terms of miles). However, for the purposes of the traffic analysis and in response to this request, additional information using one-way trips has been provided. Please see the response to Item 1.4.16-4 below for an updated average volume and LOS analysis for the construction phase of the Proposed Project.
1.4.16-4	Traffic and Transportation	p. 16	Please clarify how lane capacities were estimated (i.e., using standards from Highway Capacity Manual, or municipal traffic manuals?), and if estimated capacity considers likely need for lower speed through construction zones.	The response correctly identified the County of San Diego and San Diego Traffic Engineers Council as the source for capacities. But there is no LOS analysis showing what capacities were used for each roadway. See the attached table for a typical roadway analysis table, clearly showing the utilized roadway capacity.	Exhibit OO: Response to 1.4.16-1 provides the requested LOS analysis.
1.4.16-5	Traffic and Transportation	p. 15	Please provide clarification on which roads would have lanes closed or would be closed completely and an additional discussion of vehicle capacity of identified detour routes.	It is understood that identification of roads that will have lane closures is not available at this stage of the design. Absent that data, the traffic section of the environmental document will need to assume lane closures on each roadway where the pipeline is being constructed. Please provide updates on roadway lane closures as they become available.	The analysis was updated to assume that one travel lane will be closed for each segment along the pipeline alignment. The roadway capacity used for the analysis reduced the classification's capacity by one-half for two-lane roads and by one-quarter for four-lane roads.
1.4.18-3	Pardee Parcels	p. 1-42	Public comments indicated potential single family home development planned for the Pardee parcels in Bonsall, CA. These residential developments would impact an alternative route. Address these potential cumulative projects as well as Identify other potential cumulative projects in the vicinity of other route alternatives/deviations.	Under NEPA, "cumulative effects must be evaluated along with the direct effects and indirect effects (those that occur later in time or farther removed in distance) of each alternative".	To facilitate the analysis of the Route Segment Alternatives, Exhibit PP: Response to 1.4.18-3 provides an updated screening matrix for the Route Segment Alternatives, which compares each Route Segment Alternative to the corresponding segment of the Proposed Project. Each of the Route Segment Alternatives was initially considered but not carried forward as part of the proposed route due to reasons identified in the PEA and included in the provided table. Such reasons include constructability constraints, increased environmental constraints, and other limitations. Consequently, the Route Segment Alternatives do not require further analysis of potential cumulative impacts.
1.5-4	Existing Line 1600 Alignment Alternatives		Provide a map showing the probable locations of the numerous temporary lateral pipelines necessary to maintain service to the customers served by Line 1600 in the event one of the existing alignment alternatives is selected. Provide a table similar to Table 5-1 presenting data on the temporary laterals including the number and length of the laterals and the quantitative estimate of impacts on the environmental features crossed.		The Applicants would install temporary bypasses on existing laterals; temporary lateral pipelines would not be necessary. The temporary bypasses would be located within existing rights-of-way (ROWs). The Applicants' November 30, 2015 Response included a map showing the locations of the temporary bypasses required to maintain service during construction of the Existing Alignment Alternatives as Exhibit X: Response to 1.5-4. Further, Exhibit QQ: Response to 1.5-4 presents the information included in Table 5-1: Alternatives Screening Matrix for Line 1600.

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	Applicants' Response No. 2 February 12, 2016
1.5-5	Existing Line 1600 Alignment Alternatives	p. 5-8	Provide a map of Line 1600 that identifies the locations of constraints along the existing right-of-way. The map should also show where expansion of the existing right-of-way for a new pipeline could address each constraint and where the constraint is severe enough to require a route deviation from the existing right-of-way. Include a table similar to Table 5-1 that presents the quantitative estimate of impacts on the environmental features crossed by the expanded right-of-way and by the route deviations.	The Applicants' response to Item 1.5-5 is only partly complete. Provide a table similar to PEA Table 5-1 that presents the quantitative estimate of impacts on the environmental features crossed by the expanded right-of-way and by the route deviations. This information presents a full estimate of the potential impacts of constructing on the existing Line 1600 right-of-way. CPUC will comply with the California disclosure law to not show specific parcels in a public document.	In the Applicants' November 30, 2015 Response, the No Project Alternative column of Table 5-1: Alternatives Screening Matrix provides the environmental features crossed by the Line 1600 Existing Alignment Alternatives. Table 5-1 presents features crossed by the alternative alignments or that fall within a buffer of the alignments, and not an area based on ROW widths; therefore, an expanded ROW would not affect the results presented. To facilitate review of this item, Exhibit QQ: Response to 1.5-4 presents the information provided in Table 5-1: Alternatives Screening Matrix specifically for the Line 1600 Existing Alignment Alternatives. Please note that this is the same as the No Project Alternative because the No Project Alternative and the Line 1600 Existing Alignment Alternatives follow the same route (Line 1600).
1.5-7	LNG Alternatives	p. 5-13	The PEA includes an LNG alternative that would entail constructing a liquefaction facility in a highly urbanized area. Provide an LNG alternative that considers constructing an LNG facility in a more appropriate location (i.e., rural area) and include the lengths of pipeline necessary to connect the existing pipeline system to the facility.	The Applicants' response to Item 1.5-7 is not sufficient. It is necessary to consider the scale of the additional potential impacts associated with building an LNG facility in a rural area. Although the Applicants have not selected a specific location for such a facility, provide the parameters/characteristics of a suitable location and an estimate of the length of pipeline necessary to interconnect with the existing infrastructure.	<p>As described in the PEA, Chapter 5 Discussion of Significant Impacts and Project Alternatives, the dismissed United States LNG Alternative considered construction of an LNG facility either within the existing gas transmission system in the vicinity of Line 3010 or outside of the existing system. As further described in the PEA, the Applicants considered the possibility of locating the LNG facility outside of the system, in a rural area, but determined that such an alternative was even less desirable than an LNG facility in a highly urbanized area because it would require the construction of new pipeline infrastructure either to deliver natural gas to the storage site or to deliver LNG to the storage site to be gasified and distributed.</p> <p>In response to the CPUC's request for the Applicants to provide an LNG alternative in a rural area, the Applicants used the SANGIS Land Layers Inventory to determine areas that are considered rural and undeveloped as the basis for theoretically locating an LNG facility. As depicted in Exhibit RR: Response to 1.5-7, one such location is approximately 70 miles east from Line 3010. For this alternative, Line 3600 would supply the natural gas to be liquefied at the LNG facility and would require the construction of a total of approximately 85 miles of new, approximately 30 inch diameter natural gas pipelines (a 70 mile pipeline from the LNG facility to Line 3010 and a 15 mile pipeline from Line 3600 to the new 70 mile pipeline). This theoretical location assumes the availability of an energy source to cool the natural gas to -162 degrees Celsius is within close proximity and assumes the new pipelines would be constructed, primarily along the Interstate 8 corridor. The LNG facility would also need to be capable of storing in excess of one billion standard cubic feet of natural gas in order to meet the Proposed Project objectives, which assumes the availability of vacant land in excess of 40 acres with relatively flat topography. Construction of the each pipeline would require an estimated 100 feet of temporary ROW for construction and 50 feet of permanent ROW for operation and maintenance.</p>