

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 8, 2017

SENT BY E-MAIL

Estela de Llanos  
San Diego Gas and Electric Company  
Director, Major Project Development  
8330 Century Park Court, CP31D  
San Diego, CA 92123  
[edellanos@semprautilities.com](mailto:edellanos@semprautilities.com)

**RE: Data Request for the San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600**

Dear Ms. de Llanos:

Upon further review of SDG&E's and SoCalGas's Proponent's Environmental Assessment (PEA) for the Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600 Project, the Energy Division requests the information contained in Attachment 1 to this letter. One set of responses should be submitted to the Energy Division and another to Ecology and Environment in hard copy and electronic format. Please direct the hard copy for Ecology and Environment to Lara Rachowicz in San Francisco. We request that SDG&E respond to this data request by June 23, 2017. Inform us as soon as possible if you cannot provide specific responses by this date. Delays in responding to this data request may cause delays in the CEQA Review process.

Direct questions to Rob Peterson at (415) 703-2820 or by e-mail (address below). Please copy the CPUC's consultant, Laurie Weaver, Ecology & Environment, Inc., on all communications ([lweaver@ene.com](mailto:lweaver@ene.com)). Energy Division reserves the right to request additional information at any point during the proceeding and subsequently during project construction and restoration should the CPCN application be approved.

Sincerely,

A handwritten signature in black ink that reads "Rob Peterson".

Rob Peterson  
Project Manager, Energy Division, Infrastructure Permitting and CEQA  
[Robert.Peterson@cpuc.ca.gov](mailto:Robert.Peterson@cpuc.ca.gov)

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cc:

Edalia Olivo-Gomez, project team member, SDG&E  
Rich Quasarano, project team member, SDG&E  
Kirstie Raagas, project team member, SDG&E  
Molly Sterkel, Program Manager, Infrastructure Planning and Permitting  
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA  
Jonathan Koltz, CPUC Attorney  
Laurie Weaver, Project Manager, Ecology and Environment, Inc.  
Lara Rachowicz, Deputy Project Manager, Ecology and Environment, Inc.

Attachment 1:

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
<b>Data Request No. 2</b>							
<b>Project Description</b>							
DG 2-7	Project Description	GIS	<p><b>GIS clarifications; provide a complete workspace layer that assigns temporary and permanent impacts to each space.</b></p> <ol style="list-style-type: none"> <li>Does the 4-21-17 file '<b>PSRP_Facilities</b>' miscategorize the outer Line 1601 Cross-tie boundary as a permanent fence? It seems like it should be a vegetation maintenance buffer, temporary impact, based on the other facilities.</li> <li>Should the file <b>PSRP_Facilities</b> be used to append permanent fence areas into the file <b>PSRP_Workspace</b> to include the aboveground facility footprints as permanent impacts?</li> <li>Workspaces for distribution system modifications were initially provided 4-1-16. These workspaces are not separated into permanent and temporary workspaces, and additionally overlap the 4-21-17 file <b>PSRP_Workspace</b>. Provide a new workspace file that incorporates Line 3602 workspace and Line 1600 distribution system modifications workspace and clearly delineates temporary and permanent workspace without overlap between temporary and permanent workspace and describes the type of workspace (e.g., Temporary ROW, Temporary Laydown Area, Permanent MLV, Temporary Access Road, Permanent Patrol Road, etc.). Please also eliminate overlap between Line 3602 and Line 1600 workspace except where impacts may need to overlap to account for repeated impact at different times.</li> <li>There are multiple spots where workspaces overlap within the file <b>PSRP_Workspace</b> sent on 4-21-17. There should be no overlaps, in order to prevent double counting impacts. Of particular concern are spaces where temporary impacts overlap permanent impacts (described below). Should we remove these, giving permanent impacts preference? <ol style="list-style-type: none"> <li>Permanent Patrol Road near 6" KV-MM Extension Section 2 Permanent Impacts over Temporary Impacts (ROW limits)</li> <li>Permanent Patrol road south of the 6" KV-MM Extension Section 2 towards MLV 10 over Temporary Impacts (ROW Limits)</li> <li>6 crossings of Permanent Patrol Road between MP 3 and 4 over Temporary Impacts (ROW limits)</li> </ol> </li> <li>Should laydown areas be included as temporary impacts in the workspace file? Presently, they are not there, they also overlap workspaces, including permanent workspace (MLV 2).</li> <li>Proposed Regulator Station A, B, C footprints are not appropriately incorporated into <b>PSRP_Workspace</b> (they are either missing or temporary impacts), should these be permanent since they are the proposed footprints?</li> <li>The field delineated vegetation data (<b>Insignia_Vegetation</b> received 1-31-17) does not provide full coverage of the workspace file (<b>PSRP_Workspace</b> received 4-21-17) because it omits certain patrol roads. Provide vegetation data with full coverage of the updated workspace file, to facilitate our impact analysis.</li> </ol>	6/8/2017			
<b>Alternatives</b>							
DG 3-8	Alternatives	PEA, Section 5.2.2 and 5.2.4	<p><b>Provide geospatial data (GIS).</b></p> <p>Provide GIS shapefiles and/or kmzs for the following route segments/alternatives:</p> <ul style="list-style-type: none"> <li>Infrastructure Corridor.</li> <li>Northern Baja.</li> <li>Otay Mesa Alternatives.</li> </ul>	6/8/2017			

Attachment 1: San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-rating Line 1600 Data Request No. 2 (June 8, 2017)

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
<b>Data Request No. 2</b>							
			<ul style="list-style-type: none"> <li>Offshore Route.</li> <li>United States LNG.</li> <li>Kearny Villa Road alternative layout that ends at Line 2010, as previously described under the Applicants' response to DG 3-5.</li> <li>West side of the aqueduct road.</li> </ul>				
DG 3-9	Alternatives / land use descriptions	PEA, Section 5.2.3 and 5.2.4 Pages: 5-24, 5-30, 5-31, 5-32, 5-33, 5-37, 5-49	<p>Several alternatives refer to "undeveloped land" as a reason that the alternative was written off or not preferred – what definition did SDG&amp;E use for "undeveloped land" and was that definition applied globally for each alternative where used? If not, is this specific based on potential resources within an alternative that was analyzed, and thus may vary? It appears "undeveloped land" was used interchangeably with "cross-country", or does the latter have a different meaning? Examples include:</p> <ul style="list-style-type: none"> <li>Rainbow – El Norte Parkway – Santee Alternative</li> <li>Valley Center Alternative.</li> </ul>	6/8/2017			
DG 3-10	Alternatives		Provide GIS data for all segments along Line 1600 that have been repaired or replaced since Line 1600 first went into service or as far back as the Applicants' maintenance records for Line 1600 go. Include GIS attribute data that identifies the length and date of each repair or replacement and a brief description of the work done.	6/8/2017			
<b>Environmental Impact Analysis</b>							
<b>Biological Resources</b>							
DG 4.4-4	Biological Resources		<p><b>Clarify mitigation parcel.</b></p> <p>What is the name of the 114 acre high quality habitat parcel potentially available to the Applicants for mitigation of coastal California gnatcatcher, where is it located, and what species can it cover? Has it already been purchased? If so, when was it purchased and how many acres of mitigation remain?</p>	6/8/2017			
DG 4.4-5	Biological Resources		<p><b>Provide updated information about USFWS permitting strategy.</b></p> <p>Provide results from follow-up communication with the USFWS after they receive additional input from their solicitors about the possibility of using a combined approach for permitting (i.e., SDG&amp;E's NCCP for riparian species and a new HCP for coastal California gnatcatcher).</p>	6/8/2017			
DG 4.4-6	Biological Resources		<p><b>Provide updated information about impacts on species listed under the federal ESA in areas where the USACE is likely to take jurisdiction for the proposed project.</b></p> <p>As stated by USFWS on May 10, 2017, impacts on habitat for listed species in likely USACE-jurisdictional areas are not covered under SDG&amp;E's NCCP. Provide an update on the temporary and/or permanent impacts to listed species habitat proposed in likely USACE-jurisdictional area.</p>	6/8/2017			

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<b>Data Request No. 2</b>							
DG 4.4-7	Biological Resources		<p><b>Rare Plant Survey Data.</b></p> <p>As suggested by USFWS and CDFW:</p> <ul style="list-style-type: none"> <li>• Provide 2017 survey results for rare plants for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602, Kearny Villa Road, west side of aqueduct road, and Spring Canyon Fuel Break.</li> <li>• Provide updated 2017 survey results for <i>Brodiaea filifolia</i> (surveys of clay soil areas) for the proposed project.</li> </ul>	6/8/2017			
DG 4.4-8	Biological Resources		<p><b>Collect available data for route alternatives and non-Miramar alternatives.</b></p> <p>Provide surveys results if available, and GIS shapefiles if available:</p> <ul style="list-style-type: none"> <li>• Provide available survey data from Stephens' kangaroo rat.</li> <li>• Provide available data from recent Quino checkerspot butterfly surveys of route segment alternatives (e.g., near Spring Canyon Fuel Break). Would SDG&amp;E's HCP be utilized for this species?</li> <li>• Provide available recent data for vernal pools, fairy shrimp habitat, and fairy shrimp presence/absence for the non-Miramar alternative, as suggested by USFWS and CDFW (e.g., from Fanita Ranch, city of San Diego)</li> </ul>	6/8/2017			
DG 4.4-9	Biological Resources		Provide an update on the status of all biological surveys along the Rainbow to Santee non-Miramar alternative. Describe any access problems. If access problems exist, discuss whether a letter from the CPUC would help with obtaining access if access is being restricted by a public agency.	6/8/2017			
<b>Cultural Resources</b>							
DG 4.5-1	Cultural Resources		<p><b>Provide updated shapefiles for cultural resources.</b></p> <p>Provide shapefiles that clearly show the limits of the areas surveyed to date for cultural resources.</p> <p>Provide shapefiles that clearly delineate the area of direct impact and the area of indirect effect.</p>	6/8/2017			
DG 4.5-2	Cultural Resources		Complete an archeological field investigation and provide results, within the survey corridor and APE for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602. Complete a paleontological field investigation and provide results for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602.	6/8/2017			