

San Diego Gas & Electric Company (SDG&E) 10/20/15 Response
A.15-08-006 SDG&E Tie Line (TL) 649 Wood-to-Steel Replacement Project (Proposed Project)
California Public Utilities Commission (CPUC) Deficiency Request 01 Dated September 9, 2015

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3.4-1	Project Description	p. 3-2	Figures 3.2 and 3.3 are inadequate to display the proposed project. Figure 3.2 is of too small of scale. Figure 3.3 is missing the O'Neil Canyon tap and does not show TL 649 going to San Ysidro Substation as discussed.	9/9/15	10/20/15	Figure 3-2: Regional System Map (Confidential) has been revised to be at a larger scale. Figure 3-3: Existing and Proposed System Configuration (Confidential) has been revised to label the O'Neil Canyon tap and show TL 649 going to San Ysidro Substation. Revised versions of the figures have been included here in Attachment A: Revised Figures (Confidential).
3.4-2	Project Description	p. 3-2	The PEA does not provide GIS (or equivalent) data layers for the proposed project.	9/9/15	10/20/15	The following geographic information system (GIS) data layers for the Proposed Project will be sent separately in electronic format: <ul style="list-style-type: none"> • Power line alignment • Distribution line alignment • Access road centerlines • Trenching centerlines • Point locations for existing poles • Point locations for Proposed Project poles • Point locations for guard structures • Point locations for access road modifications

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						<ul style="list-style-type: none"> • Point locations for trenching • Underground to overhead conversion pulling site • Staging yards
3.7.0-1	Project Description	p. 3-14	The PEA states that “minor adjustments to the access requirements” may be necessary at the time of construction due to site condition and that “SDG&E will identify the specific locations and improvements that are required” and “complete an internal environmental review that analyzes and minimizes potential impacts to sensitive environmental resources.” This section suggests that future project modifications may result in potentially significant environmental impacts. More detail needs to be provided on potential changes to the proposed project to properly evaluate potentially significant impacts.	9/9/15	10/20/15	Site conditions, sensitive environmental resources, and access requirements at the time of construction may require minor adjustments to the access requirements. Potential changes to the Proposed Project may include, but are not limited to, use of additional existing access roads, access roads improvements outside the existing footprint of the roadway, shifted and/or additional overland travel routes, and changes to the number and location of turnarounds. The response to deficiency number 3.10-1 provides an explanation of the internal environmental review.
3.7.4-1	Project Description	p. 3-19	The PEA does not provide vehicle types, number of	9/9/15	10/20/15	Pole installation is included in the original Attachment 3-C: Construction Equipment

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			vehicles, and estimated number of trips and hours of operation for the construction crew and their equipment for pole installation and removal.			Summary under Direct-Buried Construction and Pole Installation, and pole removal is included under Stringing Activities. Estimated hours of operation for on-road vehicles are not included in Attachment 3-C: Construction Equipment Summary because the air quality emissions are calculated based on daily vehicle miles traveled. An updated version of Attachment 3-C: Construction Equipment Summary including the anticipated number of daily trips for each on-road vehicle is provided here in Attachment B: Revised Construction Equipment Summary.
3.7.4-2	Project Description	p. 3-23	There is mention of the potential need for blasting during construction. According to the PEA, if blasting is deemed necessary, “The appropriate BMPs will be used before, during, and after all construction activities where necessary to prevent erosion and off-site sedimentation.” These BMPs need to be included in the Project Description as APMs.	9/9/15	10/20/15	SDG&E considers use and implementation of erosion and sediment control best management practices (BMPs) to be standard operating procedures; therefore, no applicant-proposed measures are proposed. Potential BMPs to be implemented during Proposed Project construction are included here in Attachment C: SDG&E’s BMP Manual. The specific BMPs that will be installed for blasting activities will be determined by a Qualified Storm Water Pollution Prevention Plan Developer during construction prior to blasting activities.

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						Typical BMPs include, but are not limited to, silt fence, fiber rolls, erosion control blankets, and stockpile management.
3.7.6-1	Project Description	p. 3-25	The Project Description states that “if construction occurs outside of the hours allowed by the City of Vista, the City of San Diego, or the County of San Diego, SDG&E will meet and confer, or follow established practices with the appropriate jurisdictions, as needed.” The statement that SDG&E “will meet and confer” is inadequate mitigation. The use of the word “or” after this statement implies that that “meet and confer” is a possible mitigation measure.	9/9/15	10/20/15	The use of the word “or” refers to the fact that SDG&E has established practices with the County of San Diego and will follow those practices unless the county requests to meet and confer. SDG&E’s established practices with the County of San Diego allow for construction activities outside of allowed hours by submitting a SDG&E Maintenance Work (Non-Standard Work Hours) notification form. For construction outside of the hours allowed by the cities of Chula Vista and San Diego, SDG&E will meet and confer with the appropriate jurisdiction to determine if a permit or exception is required.
3.7.7-1	Project Description	p. 3-25	The Project Description states that “removal of existing poles will occur immediately following new conductor installation unless third-party facilities are present, which may temporarily delay existing pole removal by approximately 30 to 60 days until	9/9/15	10/20/15	AT&T currently has lines co-located on pole locations 108 through 117 within the Proposed Project alignment. For such co-location situations, SDG&E typically tops the existing poles above the third-party lines after the new poles are installed after which the SDG&E lines are transferred. Then, SDG&E requests the third party to transfer

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			the third party relocates its facilities.” Please indicate what types of third-party facilities are anticipated, and what is meant by “relocation.”			or “relocate” their existing lines to the new poles. Upon completion of the third-party relocation, SDG&E returns to remove the existing poles. For these specific poles, AT&T is obligated to relocate their lines but not under a specified timeframe; however, SDG&E will request that it be completed within 30 to 60 days barring any unforeseen complications.
3.8.0-1	Project Description	p. 3-26	The Project Description states that “road maintenance includes grading of existing access roads, installation of BMPs, spot-repair of erosion sites, and vegetation trimming, as needed.” Please provide a list of BMPs that potentially would be installed.	9/9/15	10/20/15	The specific BMPs to be installed will be determined based on site conditions, but typical BMPs for road maintenance include, but are not limited to, fiber rolls, sand bag barriers, diversion berms, and drainage swales, which are described and provided here in Attachment C: SDG&E BMP Manual.
3.8.2-1	Project Description	p. 3-27	The Project Description states that ‘SDG&E normally utilizes one or more of 16 herbicides.’ Please provide a list of these herbicides and clarify whether herbicides not listed potentially might be applied. If herbicides other than the 16 mentioned might be applied, these other	9/9/15	10/20/15	The following is a list of the herbicides that SDG&E utilizes depending on site conditions and weed abatement requirements: <ol style="list-style-type: none"> 1. Esplanade 200 SC 2. Garlon 4 Ultra 3. Pathfinder II 4. Spra-Kil SK-26 5. Landmark XP

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			herbicides must be listed.			<ul style="list-style-type: none"> 6. Portfolio 4F California 7. Gallery 75 DF / Gallery SC 8. Rotary 2 SL 9. Rodeo 10. Roundup Pro Concentrate 11. Accord XRT II 12. Payload 13. Dimension Ultra 40/Dimension 2EW 14. Volunteer 15. Arrow 2EC 16. Milestone <p>SDG&E does not currently anticipate utilizing any additional herbicides.</p>
3.8.4-1	Project Description	p. 3-27	The PEA does not provide an adequate discussion of the use of helicopters including any BMPs that would be employed, flight paths, payloads, and hours of operation for known locations and work types.	9/9/15	10/20/15	Section 3.8.4 Use of Helicopters is intended to provide background on SDG&E's existing use of helicopters to patrol and maintain transmission lines in SDG&E's service territory for operation and maintenance, not for construction of the Proposed Project. Therefore, no specific BMPs, flight paths, payloads, or hours of operation as it relates to construction of the Proposed Project have been included.
3.10-1	Project Description	p. 3-30	The Project Description states that "If additional or modified	9/9/15	10/20/15	Site conditions, safe access, and plan and permit requirements at the time of

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			<p>work areas or use of additional existing access roads, additional modifications to existing access roads, or use of additional or modified overland travel routes to work areas are required, SDG&E will identify the specific locations and improvements that are required, and complete an internal environmental review that analyzes and minimizes potential impacts to sensitive environmental resources.” The PEA needs to either specify the potential areas of effect or explain how an “internal environmental review” will reduce any potentially significant impacts to the environment to a less-than-significant level.</p>			<p>construction may result in the need for minor adjustments to the work areas and planned access routes. The precise location and number of temporary work areas (such as turnaround areas, stringing sites, guard structures, and overhead conversion pulling sites) may change as necessary. SDG&E’s internal environmental review process starts with the resource monitors (biological, aquatic, and cultural/paleontological) reviewing the proposed modifications and working with the construction crews to ensure the proposed modifications avoid potentially significant impacts. The lead biologist then prepares a memorandum that documents an evaluation of biological, aquatic, and cultural/paleontological resources; and any minimization measures or resource monitoring requirements. The proposed modification as documented is reviewed by SDG&E for consistency with the significance findings in the California Environmental Quality Act (CEQA) document. After the consistency review is completed, SDG&E proceeds with construction in accordance with any necessary minimization measures and</p>

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						<p>monitoring requirements.</p> <p>For pole work areas, the resource monitors (biological, aquatic, and cultural/paleontological) will assist construction crews with minor changes to the pole work areas in the field to avoid sensitive environmental resources.¹</p>
4.4.3-1	Biological Resources	p. 4.4-51-52	The PEA states that the Riverside fairy shrimp and San Diego fairy shrimp (both of which are federally-listed as endangered) have “high potential to occur within the Survey Area.” The PEA then states that “SDG&E will conduct protocol-level surveys prior to construction to determine the presence or absence of San Diego and/or Riverside fairy shrimp species in suitable habitat in the following locations: Main Street Staging	9/9/15	10/20/15	SDG&E is currently conducting protocol-level surveys for special-status fairy shrimp at the Main Street Staging Yard, within the access roads and proposed work areas between pole locations 1 through 78, and within the access roads and proposed work areas between pole locations 96 through 117. USFWS critical habitat for the San Diego fairy shrimp is located between pole locations 79 and 95; therefore, protocol-level surveys for special-status fairy shrimp are not proposed in this area, and the San Diego fairy shrimp and the Riverside fairy shrimp are presumed to be present along

¹ The procedures for minor field adjustments were established and approved by the CPUC for the Tie Line 637 Wood-to-Steel Project. The process proposed for the Proposed Project is consistent with the procedures established for Tie Line 637.

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			Yard, within the access roads and proposed work areas between pole locations 1 through 78, and within the access roads and proposed work areas between pole locations 96 through 117. If surveys cannot be feasibly completed prior to construction in these locations, the Proposed Project will avoid suitable habitat for special-status fairy shrimp when soils are wet.” Please note that the stated proposed avoidance measure is inadequate. If protocol-level surveys are not conducted, CPUC will assume presence of these species and appropriate mitigation measures will be proposed.			this portion of the alignment. SDG&E anticipates that during construction it will need to drive through potentially suitable special-status fairy shrimp habitat only when dry.
4.8-1	Hazards and Hazardous Materials	p. 4.8-i	The PEA does not include a Hazardous Substance Control and Emergency Response Plan, a Health and Safety Plan, or a Worker Environmental Awareness Program.	9/9/15	10/20/15	SDG&E believes that a Hazardous Substance Control and Emergency Response Plan is not required since hazardous materials/waste management, spill control, and contaminated soil management are included in SDG&E’s BMP Manual.

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						<p>Similarly, SDG&E does not believe that a project-specific Health and Safety Plan is required. Contractors will be required to submit a Health and Safety Plan to SDG&E prior to construction. These plans are not yet available as the contractor(s) that will perform the work have not yet been chosen. In addition, SDG&E has a company-wide Injury and Illness Prevention Plan.</p> <p>As described in PEA Section 3.10 Project Design Features and Ordinary Construction/Operating Restrictions (pages 3-31, 3-36, and 3-37), SDG&E will prepare a training program to provide information about biological resources, cultural resources, and hazardous materials. This training will address construction-related environmental requirements and incorporate the relevant Project Design Features and Ordinary Construction/Operating Restrictions and mitigation measures included in the final CEQA document. As such, the Worker Environmental Awareness Program will be prepared upon completion</p>

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						of the final CEQA document.
4.16.4-1	Transportation and Traffic	p. 4.16-11	The PEA does not provide a preliminary description of the traffic management plan that would be implemented during construction of the proposed project.	9/9/15	10/16/15	The traffic control plan for the Proposed Project will be developed approximately 30 to 60 days prior to construction. An example traffic control plan has been provided here in Attachment D: Example Traffic Control Plan for illustrative purposes.
4.18.6-1	Cumulative Analysis	p. 4.18-3	The PEA does not provide a list of projects (i.e., past, present and reasonably foreseeable future projects) within the Project Area that the applicant is involved in.	9/9/15	10/16/15	The only known SDG&E project within one mile of the Proposed Project is the Pio Pico Energy Center Gas Line project, which is included in Table 4.18-1: Planned and Proposed Projects within One Mile in the PEA.