

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 17, 2014

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Data #3 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of San Diego Gas and Electric Company's (SDG&E) application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project).

Based on review of SDG&E's responses to Data Request #2, the CPUC finds that there remain incomplete, inaccurate, and delayed responses that are still required to complete the project description and the environmental resource analysis for the Environmental Impact Report (EIR). Additionally, the CPUC has identified new project description data requests based on the SDG&E Project Refinements Report (PRR) submittal that accompanied the data request responses. These data needs are identified in the attached Request for Additional Data #3 which is supported by the following enclosed attachments:

Attachment 1 – Project detail maps with comments cross-referenced to data request table

Attachment 2 – Project detail maps indicating where additional biological surveys are required

Attachment 3 – Project detail maps indicating where additional cultural resource surveys are required

Data Request #2 included a draft EIR Project Description that SDG&E was supposed to review and verify for accuracy, providing track-change edits as necessary. SDG&E did not do this, and now there are additional substantive changes to the project description. Therefore, once a complete and accurate response to Data Request #3 is in hand, the CPUC's environmental consultant, Panorama, will incorporate all supplemental project information into the draft EIR Project Description which will then be submitted to SDG&E for review and acceptance. Please note that this delays the availability of a complete project description for the EIR technical authors, and thereby delays completion of the draft EIR.

Information provided by SDG&E in response to this Request for Additional Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than December 16, 2014. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the EIR.

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Please note that the CPUC continues to request information on the project description, biology, cultural resources, traffic, and noise that are necessary to define the baseline environmental conditions and analyze the environmental impacts of the Proposed Project. SDG&E's failure to provide this information in the Application has already resulted in delays to the CEQA environmental review schedule and any delays in providing the requested data will result in further delays to the CEQA schedule.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the Project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Billie Blanchard".

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Peter Allen, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental
Susanne Heim, Deputy Project Manager, Panorama Environmental
Darryl Gruen, Attorney for ORA
Frank Ghazzagh, ORA

November 17, 2014

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #3 FOR THE SYCAMORE-PEÑASQUITOS 230-KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified several areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project and to define a range of alternatives in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need. Referenced attachments follow Table 1.

Table 1: Application No. 14-04-011 Data Needs #3

#	Reference Source, Page #	Data Need
Project Description		
1	Data Request #1, Item 7; Data Request #2, Item 1	<p>Provide letters of permission from each staging yard property owner documenting that SDG&E may use each site for the proposed uses. Provide additional information regarding staging area use and activities.</p> <p>The following information is needed to define use and impacts within each staging yard:</p> <ul style="list-style-type: none"> • Vegetation removal needed • Grading needed • Acreage of each staging yard that is to be used, and the location of the area of proposed use within the larger staging area in GIS • Verification letter from landowner indicating their understanding of intended staging yard use and providing permission for such use • Description of how staging area would be used • Vehicle entrance/exit location and description of potential construction of new or improved vehicle access <p><u>SDG&E's response to Data Request #2 was incomplete and did not address the information needed to define use and impacts at each staging yard. It also failed to provide landowner verification that each of the proposed staging yards may be used for Project staging.</u> The two landowner letters that were submitted by SDG&E only authorize non-invasive surveys of the site and do not describe the staging activities that may be conducted on the site. Furthermore, neither letter provides a commitment of the proposed staging yard for construction purposes. <u>If SDG&E cannot obtain landowner</u></p>

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#	Reference Source, Page #	Data Need
		<p><u>approval in writing at this time, the staging yard can be considered in the EIR analysis; however, any staging yard location changes in the future will require filing of a Petition for Modification and some type of additional CEQA work.</u></p> <p>This project component has been a moving target, and details regarding staging yards are needed to complete the PD and analysis in all sections of the EIR. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. Supplemental biological and cultural resources surveys will be needed for new staging yards.</p>
2	<p>Data Request #1, Item 7; Data Request #2, Item 2</p>	<p>Provide GIS polygon data and acreage of proposed staging areas within Sycamore Canyon Substation, Peñasquitos Substation, Chicarita Substation, Mission Substation, and San Luis Rey Substation and substation access roads.</p> <p>Show the areas that would be used for staging at the substations and any access road segments that would be used for staging.</p> <p><u>SDG&E's response to Data Request #2 did not provide the requested GIS data showing where staging could occur in the substations or acreage of staging areas available within the substations.</u> These substations are mostly built out and these substations may not provide adequate space for staging of materials. More definition of the staging area within the substations is needed to understand whether these are feasible staging yards.</p> <p>SDG&E's response to Data Request #2 states that "any of the identified and mapped substations (and surrounding roads) could be used" for temporary materials laydown/storage during construction. Clarify if the only roads that would be used have been identified as a project access road and are owned by SDG&E. If additional roads would be used for laydown/storage, identify those roads and the areas of use.</p> <p>Details regarding staging yards are needed to complete the PD and analysis in all sections of the EIR. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
3	<p>Data Request #1, Item 9; Data Request #2, Item 7 Project Refinement Report</p>	<p>Re-label the topped poles in the GIS data to match the labeling in the PRR table and provide pole IDs provided in response to Item 9 (e.g., H-Frame Steel 1). Add the 69-kV topped 1 pole to the GIS.</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> Provide GIS data labeling the poles proposed to be topped, as requested. We have labeled them as T1 through T7 in Attachment 1.</p> <p>This information is needed to support the aesthetics analysis in the EIR. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
4	<p>Data Request #1, Item 13; Data Request</p>	<p>Provide additional details on the amount of cut-and-fill required for staging yards.</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> Provide the amount</p>

Table 1: Application No. 14-04-011 Data Needs #3

#	Reference Source, Page #	Data Need
	#2, Item 13	<p>of estimated cut-and-fill in cubic yards for staging yards.</p> <p>Details regarding staging yards are needed to complete the PD and analysis in all sections of the EIR. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
5	Data Request #2, Item 15	<p>Describe the activities that would be conducted in areas labeled as “Other Temporary Areas” in the GIS</p> <p>A new work area GIS data layer was provided in response to Data Request #2 which was labeled as "Other Temporary Areas". What activities would occur at these locations?</p> <p>This information is needed to complete the PD and support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
6	Data Request #2, Item 16	<p>Provide a copy of SDG&E’s Best Management Practices (BMP) Manual.</p> <p>SDG&E’s response to Data Request #2 references that BMP and drainage controls would follow an SDG&E BMP Manual. Provide a copy of the BMP Manual so that it can be reviewed and referenced in the EIR water quality analysis.</p> <p>This information is needed to support the hydrology and water quality analysis in the EIR. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
7	Data Request #2, Item 18	<p>Identify the locations of overland access routes and describe the activities to be performed within overland routes.</p> <p>SDG&E’s response to Data Request #2 states that no overland access is currently anticipated; <u>however, this response conflicts with a later response to DR#2, Item19 which discusses overland access at 30 locations for vehicle passing. This also conflicts with the GIS data provided which includes potential temporary access routes outside of SDG&E’s access road network.</u> There are two road segments in the GIS data provided on November 3 that are described as “proposed” and “temporary”. One route is located southeast of P21, and the other is south of GS62. The latter no longer leads to a work area (refer to Attachment 1). Clarify if the access route southeast of P21 is an overland and temporary route, and if the route south of GS62 is still needed.</p> <p>Define overland access routes including a) where they will be located (GIS); b) their anticipated dimensions; and c) what activities would be conducted within them (e.g., vegetation removal, vehicle transit or parking, etc.).</p> <p>This information is needed to complete the PD and support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>

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#	Reference Source, Page #	Data Need
8	Data Request #1, Item 6; Data Request #2, Item 19	<p>Prepare an Access Road Plan to include revised access road GIS data.</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> SDG&E has claimed to have identified 30 overland route passing locations. Provide the GIS showing where these 30 overland routes occur, or the likely locations for passing routes that would be in the project alignment. Additionally, provide GIS attribute data indicating proposed road work (i.e., where grading and vegetation removal would occur) in the project alignment. This information is needed to address agency concerns about impacts to vernal pools and habitats.</p> <p>Additionally, there continue to be what appear to be errors in the extent of access roads included in the GIS. In particular, define the intended use of the access road north of the proposed Black Mountain Ranch Community Park stringing site, or correct the GIS provided.</p> <p>This information is needed to complete the PD and support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. Supplemental biological and cultural resources surveys may be needed.</p>
9	PEA Section 3.4.8, page 3-42; Data Request #2, Item 20	<p>Define the activities that would be conducted by helicopter and the duration of helicopter use (hours per day and total number of days).</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> Provide the maximum number of days (total duration) that helicopters could be used, and identify if multiple helicopters would be operating at any given time during project construction.</p> <p>This information is needed to complete the PD and support EIR air quality, greenhouse gas, and noise analysis. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
10	Data Request #2, Item 23	<p>Provide the power line and transmission line structure locations in GIS where vegetation clearing will be required as indicated in SDG&E's response to Data Request #2.</p> <p>SDG&E's response to Data Request #2 states that, "700 square feet (15-foot radius) is a typical area kept clear of vegetation around certain power line and transmission line structures." Identify all structures where permanent vegetation clearance would occur, and provide GIS data for the limits of the clearance area that extends past proposed structure pads, where vegetation will also be cleared.</p> <p>This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
11	EMF Management Plan; Data Request #2, Item 24	<p>Provide existing EMF data at the edge of the right-of-way by transmission line segment (e.g., Segment A West).</p> <p>SDG&E did not provide the requested EMF data in response to Data Request #2. Baseline EMF data (modeled EMF for existing conditions) is needed to address public comments and interest in the changes in EMF levels along</p>

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		<p>the alignment. GO 131-D does not exempt utilities from providing this data and the CPUC has the authority to require submittal of this information. SDG&E has provided this information to CPUC in the past. By example, the baseline EMF levels were included in the Sunrise Powerlink EIR.</p> <p>This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
12	<p>Data Request #1, Item 19; Project Refinements Report</p>	<p>Provide additional clarification regarding the Cable Pole P41 relocation in Black Mountain Ranch Community Park.</p> <p>Clarify the proposed topping and structure installation activities for the referenced structures in Black Mountain Ranch Community Park. No data was provided for the existing structure labeled R47B; however the PRR states that the pole will be replaced with a 65-foot tall steel dead end H-Frame structure. Provide the coordinates, geographic coordinate system, and structure attributes for R47B.</p> <p>Please also clarify if it is SDG&E's intent to modify the PEA description to eliminate the original cable pole location and propose the new location as the proposed Project component, or if the original location proposed is now an alternative.</p> <p>This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
13	<p>Project Refinement Report</p>	<p>Provide GIS data for poles proposed to be topped in removed in the Project Refinements Report.</p> <p>Provide the following information:</p> <ol style="list-style-type: none"> a. Topped structure GIS data with completed attributes consistent with those provided for other project structures. b. Confirm that H-Frames 2 through 6 are wood. Provide the structure type and material for the structure identified as Vertical 69-kV Topped 1. c. Steel H-Frame Structure Diagram. Provide a schematic for this structure type. d. Updated GIS data for removed structures with completed attributes listing the structure type, material, and kV rating. e. Clarify the locations of structures to be removed relative to previous submittals. Structures addressed in Table 2 of the PRR are directly adjacent to structures T1 and R43, T2 and R44, T3 and R45, T4 and R46, and T5 and R47. State whether the structures are the same, and if the removed structures identified are still accurate. f. GIS data for structure removal work areas for R2 and R72. <p>This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
14	<p>GIS; Project</p>	<p>Provide additional information on existing tower 154.</p> <p>Provide the tower type, kV rating, height, and Pole ID for Tower 154. Provide</p>

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	Refinement Report	<p>GIS data for the transmission line connected to Existing Tower 154 and P2 with completed attributes consistent with those provided for other project transmission lines. Identify how marker balls will be installed within this line segment (see attachment 1) and provide GIS for any additional access needed.</p> <p>This information is needed to complete the PD and support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. Supplemental biological and cultural resources surveys may be needed if additional access is required.</p>
15	GIS; Data Request #2, Item 25; Project Refinement Report	<p>Provide structure relocation, access and final work pad design details in GIS for all proposed Project refinements.</p> <p>SDG&E provided updated GIS attribute data, but did not provide pole relocations in GIS as described in the PRR submitted with Data Request #2 responses. Specifically, the location shifts are not detectable at structures: P4, P14, P23, P25, P32, P44, P59, and P60. Additional information is needed to analyze the impacts of the project refinements in the EIR. Provide the following data:</p> <ul style="list-style-type: none"> a. Updated GIS data with completed attributes for all the structures identified in Table 4, affected work areas, as well as work area details such as proposed grading limits and cut-and-fill areas. b. Updated GIS data for any other associated project components that are affected, such as transmission lines or access roads. <p>In addition, provide supplemental biological and cultural resources surveys and evaluations for any relocated facilities, new or refined access or grading improvements, or other activities that occur outside of previously surveyed project areas. Provide a specific date when this information will be provided if this information cannot be provided by December 16, 2014.</p> <p>This information is needed to complete the PD, define the baseline environmental conditions, and support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
16	GIS; Data Request #2, Item 25; Project Refinement Report	<p>Clarify if P45 work pad is still needed.</p> <p>The PRR states that P45 will be removed from the project; however, the proposed structure pad work area was included with the revised work area GIS data provided.</p> <p>This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
17	GIS; Data Request #2, Item 25;	<p>Clarify the pole type for P3 and provide a diagram of the structure if this pole would be different than others used on the project.</p> <p>The GIS data for proposed structures identifies P3 as a both a TSP and Cable Pole.</p> <p>This information is needed to complete the PD. If a complete data submittal</p>

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		<p>can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
18	<p>GIS; Data Request #2, Item #27</p>	<p>Verify retaining wall dimensions at P2 and P53. Proposed retaining walls at P2 and P53 still extend past the proposed structure pads. Provide revised GIS data for these locations and verify the retaining walls are contained within the pad limits (Attachment 1). This information is needed to complete the PD. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
19	<p>Project Refinement Report</p>	<p>Provide a detailed description for proposed improvements and work at Encina Hub. The detailed description needs to include:</p> <ol style="list-style-type: none"> a. Identification of all structural modifications proposed including any new tower installations with type and heights, and all temporary and permanent impacts; b. Site plans showing the locations of proposed structural improvements, temporary work areas, access, and staging; c. Description of construction process including equipment and materials required, location and use of staging and laydown areas, and timing relative to construction in other project segments; d. Description of how this activity relates to the proposed Project purpose and need; e. Cultural and biological surveys and technical reports for additional work areas and access roads; and f. All associated GIS data. <p>This information is needed to complete the PD and analysis in all sections of the EIR. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
20	<p>Project Refinements Report</p>	<p>Provide a detailed description including locations for proposed improvements and work associated with transposition of phasing on circuits TL 23001 and TL 23004. The detailed description needs to include:</p> <ol style="list-style-type: none"> a. Description of all structural modifications proposed including any new or temporary tower installations with type and heights, all activities that would be conducted during transposition (e.g. vegetation clearing) and all temporary and permanent impacts; b. Site plans showing the locations of proposed structural improvements, temporary work areas, access, and staging; c. Description of construction process including equipment and materials required, location and use of staging and laydown areas, and timing relative to construction in other project segments; d. Description of how this activity relates to the proposed Project purpose and need;

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		<p>e. Cultural and biological surveys and technical reports for additional work areas and access roads; and</p> <p>f. All associated GIS data.</p> <p>This information is needed to complete the PD and analysis in all sections of the EIR. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
21	Project Refinement Report	<p>Provide new pole refinement details to support addition of All-Dielectric Self-Supporting (ADSS) Cable in Segments A and D.</p> <p>Identify all existing and new poles that modifications are proposed to including any revisions to final pole heights. Provide schematics for all revised pole types indicating the positions of existing and proposed conductor, as well as the positions open for ADSS cable.</p> <p>This information is needed to complete the PD and support EIR aesthetics analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details needed to complete environmental analysis.</p>
Air Quality/Greenhouse Gas Emissions		
22	Air Quality Model; Data Request #2, Item 91	<p>Update the air quality modeling to reflect the increased travel distance to staging yards. Verify all other assumptions in the air quality model are consistent with the Project Description as currently proposed.</p> <p><u>SDG&E's response to Data Request #2 was incomplete and inaccurate stating both that vehicle travel was estimated at 31 miles per day and 31 miles per trip. These two measurements are incompatible.</u> Travel estimates appear to only include updates for the increased travel to staging yards; however, there are numerous refinements to the project that could affect air emissions including the total amount of cut-and-fill (import and export of material), locations of landfills (identified by SDG&E as 40 miles round trip), locations of water sources, and duration and type of use of helicopters. Assumption inconsistencies need to be resolved, after which the truck traveling distance in Table B-2 needs to be changed to reflect the correct miles (be it 35.7 miles as indicated or another value).</p> <p>This information is needed to complete the PD and support EIR air quality, greenhouse gas, and traffic analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
23	Air Quality Model; Data Request #2, Item 92	<p>Provide vehicle exhaust emissions factors for on-road trucks.</p> <p><u>SDG&E's response to Data Request #2 was incomplete and inaccurate.</u> SDG&E did not include the following emission factor files:</p> <ol style="list-style-type: none"> 2017 PM₁₀ and PM_{2.5} Tire/Brake Wear Emission Factors 2016 LDT1 all emission factors (including Running Exhaust, Hot Soak, Running Evaporative, etc.) 2016 On-Road Truck at 30 mph

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		<p>d. 2017 On-Road Truck at 30 mph</p> <p><u>Please make sure that all calculations associated with the emission factors in these files are fully verified in the next data submittal.</u></p> <p>There also is an error in all worker trip emission calculation worksheets for running evaporative loss emissions. For running evaporative loss emissions, the emission factors in grams per mile should be multiplied by the vehicle miles traveled (VMT) per day to derive emissions in grams per day.</p> <p>This information is needed to support EIR air quality analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
24	Air Quality Model; Data Request #2, Item 94	<p>Update the PM₁₀ and PM_{2.5} paved-road fugitive dust emissions for on-road vehicles and trucks to reflect the updated emissions factors in the EPA's updated AP-42 (2011).</p> <p><u>SDG&E's response to Data Request #2 was inaccurate. SDG&E incorrectly used the AP-42 Paved Road fugitive dust emission factor equation. SDG&E did not enter the equation correctly in its calculations. This error needs to be corrected throughout all paved road fugitive dust emissions worksheets.</u></p> <p>This information is needed to support EIR air quality analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
25	Air Quality Model; Data Request #2, Item 95	<p>Fix errors in materials handling fugitive dust emissions calculations.</p> <p><u>SDG&E's response to Data Request #2 was inaccurate. SDG&E incorrectly entered equations in all fugitive dust worksheets. These corrections need to be made.</u></p> <ol style="list-style-type: none"> There is no calculation for PM_{2.5} emissions from material handling on all related worksheets. In Revised Summary Table 4.3-8 of the PEA report, the category of "Fugitive Dust (Unmitigated)" should be "Fugitive Dust (Mitigated)." The total "Fugitive Dust (Unmitigated)" emissions from Segment D were not added accurately. The total "Fugitive Dust (Unmitigated)" would be approximately 86.81 lbs./day, which is not 8.86 lbs./day. The "Fugitive Dust (Mitigated)" emissions from Segment D would be approximately 33.86 lbs./day. <p>This information is needed to support EIR air quality analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
Biological Resources		
26	Data Request #2, Item 102	<p>Complete biological surveys in all areas of the Proposed Project that have not been surveyed for biological resources.</p> <p><u>SDG&E's response to Data Request #2 was incomplete. There remain some project areas that have not been surveyed based on the revised project GIS</u></p>

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		<p>and updated survey boundaries (See attachment 2). Additionally, supplemental surveys for rare plants and California gnatcatcher will need to be completed in Spring 2015 as indicated in the response provided. Provide specific dates when these pending submittals will be provided.</p> <p>This information is needed to support EIR biological resources analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. While we can leave placeholders in the biological resources section for these survey results, they will need to be addressed in the analysis prior to release of the public draft EIR.</p>
27	PEA Appendix 4.4-A, Page 58; Appendix F; Data Request #2, Item 103	<p>Provide GIS data for Quino checkerspot butterfly (QCB, <i>Euphydryas editha quino</i>) localities and Mapped Areas, and provide a project-specific habitat assessment.</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> SDG&E did not provide the requested GIS data and project specific habitat assessment. The Low-Effect HCP may adequately cover species avoidance and mitigation measures, but is not a replacement for the CEQA analysis. We cannot analyze the impacts of the project on suitable habitat without first understanding where suitable habitat is located in the project area.</p> <p>Provide GIS data identifying where QCB localities occur near the BSA or within the BSA. Confirm that the most current data for the QCB Mapped Area is sourced from the USFWS. Provide a Project-specific habitat assessment for the QCB for the BSA. The assessment needs to include GIS data and mapping of potential QCB habitat.</p> <p>The GIS data and habitat assessment are needed to support EIR biological resources analysis. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
28	PEA Appendix 4.4-A, Page 65; Appendix F; Data Request #2, Item 104	<p>Provide GIS data for the burrowing owl (BUOW, <i>Athene cunicularia</i>) habitat assessment.</p> <p><u>SDG&E did not provide the requested GIS data in response to Data Request #2.</u> SDG&E has indicated that a project-specific habitat assessment report will be provided in early 2015. Provide a specific date when this pending submittal will be provided.</p> <p>This information is needed to support EIR biological resources analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. While we can leave placeholders in the biological resources section for these survey results, they will need to be addressed in the analysis prior to release of the public draft EIR.</p>
29	PEA Appendix 4.4-A; Appendix A,	<p>Provide a habitat assessment for thread-leaved brodiaea (Bf; <i>Brodiaea filifolia</i>).</p> <p><u>SDG&E's response to Data Request #2 was incomplete.</u> Provide the GIS data for the habitat assessment submitted.</p>

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#	Reference Source, Page #	Data Need
	Figure 6; Appendix E, Table 3; Data Request #2, Item 105	This information is needed to support EIR biological resources analysis. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.
30	GIS; Data Request #2, Item 108	<p>Provide GIS Data From the Jurisdictional Delineation San Diego Gas & Electric Company’s Sycamore To Peñasquitos 230 Kilovolt Transmission Line Improvements Project (Environmental Intelligence 2014) including data on “Potential Road Rut Vernal Pools”.</p> <p><u>SDG&E’s response to Data Request #2 was incomplete.</u> Provide the complete GIS dataset for the jurisdictional delineation. Only the road rut vernal pool data was submitted.</p> <p>This information is needed to support EIR biological resources analysis. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
Cultural Resources		
31	Data Request #2, Item 109	<p>Complete cultural resource surveys in all areas of the Proposed Project that have not been surveyed for cultural resources.</p> <p><u>SDG&E’s response to Data Request #2 was incomplete.</u> The following issues were identified with the survey report submitted.</p> <ol style="list-style-type: none"> 1. They surveyed 52 locations in 4 person days (or 6 person days if Brian Williams actually participated in the survey---it is unclear). 2. Survey interval is not indicated. 3. Surface visibility is not noted, and needs to be documented for each location that was surveyed. <p>Without the specifics of person days of survey effort, the survey interval, and the ground visibility at the different locations it is difficult to evaluate the thoroughness of the effort in response to the data request. These details of effort are standard in archaeological survey reports.</p> <p>Provide the cultural survey area in GIS format. Maps in the survey memo provided with the data response illustrate additional project areas that were surveyed: however, no project features are shown for reference and the completion of cultural surveys in all project work areas cannot be verified without the GIS data. Further cultural surveys are required for project areas and access roads that have not been previously surveyed, including those shown in Attachment 3 and those addressed in the PRR.</p> <p>This information is needed to support EIR cultural resources analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. While we can leave placeholders in the cultural resources section for these survey results, they will need to be addressed in the analysis prior to release of the public draft EIR.</p>

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#	Reference Source, Page #	Data Need
32	Deficiency Report #1, Item 26; Data Request #2, Item 111	<p>Evaluate CA-SDI-14131 for CRHR eligibility or specify measures that SDG&E will implement to ensure the resource is avoided.</p> <p><u>SDG&E did not provide the required evaluation, but instead suggested identifying the site as an Environmentally Sensitive Area (ESA) during construction to ensure avoidance of impacts. This is not acceptable.</u> The buried extent of this resource is not known and could overlap with the adjacent pole work area that is in close proximity to this resource. Provide the required evaluation to determine the buried extent of the resource and the potential for effects. If the evaluation determines that there is no potential for effects, then an ESA is not needed.</p> <p>This evaluation is needed to support EIR cultural resources analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. While we can leave placeholders in the cultural resources section for these survey results, they will need to be addressed in the analysis prior to release of the public draft EIR.</p>
33	Deficiency Report #1, Item 26; Data Request #2, Item 112	<p>Provide a landscape-level assessment of potential Project impacts to:</p> <ul style="list-style-type: none"> • CA-SDI-11148H, Del Mar Historic Ranch Remains, two earthen dams • CA-SDI-11256H, Poway Historic Homestead Remains, cobblestone wall and pits • 37-033556H, Del Mar Historic Dam and possible associated structure <p>If the project would impact these resources based on the landscape-level assessment, then these resources must be evaluated for CRHR eligibility.</p> <p>SDG&E did not provide the required landscape-level assessment, but indicated that this assessment will be provided in early December and a full evaluation could be conducted and results submitted in early 2015, if needed. Provide specific dates when these pending submittals will be provided.</p> <p>This evaluation is needed to support EIR cultural resources analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. While we can leave placeholders in the cultural resources section for these survey results, they will need to be addressed in the analysis prior to release of the public draft EIR.</p>
Hazards and Hazardous Materials		
34	PEA Section 4.7	<p>Provide the SDG&E Fire Prevention Plan and the full text for SDG&E's Electric Standard Practice 113.1 so it can be considered in the analysis of impacts related to fire and fuels management.</p> <p>PEA section 4.7 Hazards and Hazardous Materials discusses the following SDG&E standards and plans.</p> <ul style="list-style-type: none"> • Project-specific Fire Prevention Plan • SDG&E's Electric Standard Practice 113.1 (Wildland Fire Prevention and Fire Safety)

Table 1: Application No. 14-04-011 Data Needs #3

#	Reference Source, Page #	Data Need
		<ul style="list-style-type: none"> SDG&E Fire Prevention Plan <p>The Project-specific Fire Prevention Plan was provided in response the Deficiency Report; however, Standard Practice 113.1 and the SDG&E Fire Prevention Plan have not been provided to the CPUC.</p> <p>This information is needed to support EIR hazards analysis. If a complete data submittal can be provided in the next 30 days, it can be folded into the EIR analysis without affecting the completion date for the public draft EIR.</p>
Noise		
35	Section 4.10.3.3, page 4.10-7; Data Request #2, Item 113	<p>Provide additional noise measurements characterizing generalized noise environments where impacts may occur.</p> <p>SDG&E did not provide the required noise measurements, but indicated that these will be provided in early December. Provide the specific date when this pending submittal will be provided.</p> <p>This information is needed to support the EIR noise analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
Traffic		
36	Data Request #1, Item 54; Data Request #2, Item 117	<p>Provide the information requested in Data Request #1, Item 54. Existing traffic count data are needed to characterize the baseline traffic conditions in the area and evaluate impacts to traffic under CEQA. SDG&E's response that the data would be provided in a Traffic Management Plan after the final alignment is complete is not adequate for completing our traffic impact analysis in the DEIR. Should SDG&E fail to provide the requested information, CPUC will conduct studies to obtain these baseline data for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies. Otherwise, inform us as to when this information will be provided. CPUC still requires the following data:</p> <ol style="list-style-type: none"> Current bi-directional ADT counts on all legs of the following intersections: <ol style="list-style-type: none"> Black Mountain Road/Carmel Valley Road Camino Del Sur/Carmel Valley Road Black Mountain Park Driveway/Carmel Valley Road Peak hour turning movement counts, including bikes and pedestrians at the following roads: <ol style="list-style-type: none"> Black Mountain Road/Carmel Valley Road Camino Del Sur/Carmel Valley Road Black Mountain Park Driveway/Carmel Valley Road <p>SDG&E did not provide the required traffic data, but indicated that this will be provided in approximately one month. Provide the specific date when this pending submittal will be provided.</p> <p>This information is needed to support EIR traffic analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing</p>

Table 1: Application No. 14-04-011 Data Needs #3

#	Reference Source, Page #	Data Need
		<p>assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
37	<p>Data Request #1, Items 55 and 60; Data Request #2, Item 119</p>	<p>Describe how long lane closures, road closure, or other effects to traffic flow would be needed for construction activities on Carmel Valley Road in Segment B.</p> <p>SDG&E did not provide the required traffic data, but indicated that this will be provided in approximately one month. Provide the specific date when this pending submittal will be provided.</p> <p>This information is needed to support EIR traffic analysis. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis.</p>
38	Data Request #2, Item 121	<p>Verify that construction equipment and vehicles could be transported on public roadways.</p> <p>SDG&E's response to Data Request #2 was incomplete. SDG&E needs to specify the method for delivery of structures and equipment that will be utilized during construction for all locations where existing roadways and ingress/egress have a limited turning radius. If access modifications or new temporary access roads are required, these need to be fully specified at this time including descriptions of: 1) their location, physical extent, and temporary or permanent nature; 2) construction techniques and methods; and 3) materials to be used including quantities of cut/fill and import/export.</p> <p>This information is needed to support EIR analysis in a number of sections. This has a substantial effect on the completion date for the public draft EIR as it exceeds our timing assumptions for receipt of required project details and technical studies needed to complete environmental analysis. Supplemental biological and cultural resources surveys could be needed.</p>