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SAN FRANCISCO, CALIFORNIA 94102-3298



April 21, 2015

Jessica Kinnahan  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT14E7  
Los Angeles, CA 90013

**SENT VIA EMAIL**

**Subject: Second Formal Request for Deficiency Items for the North-South Pipeline Project**

Ms. Kinnahan:

On, July 7<sup>th</sup>, 2014 the California Public Utilities Commission (CPUC) submitted a letter outlining several areas where the Proponent's Environmental Assessment (PEA) attached to Application A. 13-12-013 (the Application) lacked sufficient information for the CPUC to adequately conduct an environmental review of your proposed North-South Pipeline Project (the project). A second review of the PEA identified additional information gaps (deficiency items) that, when added to the deficiency items that have yet to be received from the July 7<sup>th</sup> letter, would not allow the CPUC to deem the Application complete and initiate the CEQA process. At this time, we are adding additional deficiency items, identifying outstanding deficiency items from our July 7<sup>th</sup> request, and acknowledging receipt of requested information. Attachment 1 shows the current status of all information gaps identified to date.

Please note, the CPUC is actively working towards establishing a Memorandum of Understanding with the United States Forest Service (USFS), and the deficiency items herein only include information needed for the CPUC to deem your application complete. The USFS may require additional information to initiate their review of the project pursuant to the National Environmental Policy Act (NEPA). USFS data requests, if needed, will be provided directly from the USFS under separate cover.

The CPUC recognizes that complete responses to the items listed in Attachment 1 will not be available until July 30, 2015. The CPUC will review each deficiency item as it is provided, but will not deem your application complete and publish the Notice of Preparation until all of the deficiency items have been submitted. Based on the submittal schedule for your technical reports (Attachment 2), the NOP would not be published until September 2015, at the earliest. While a complete application is needed to formally initiate the CEQA process, the CPUC recognizes that schedule is an important driver for this project. With that in mind, the CPUC can begin work on sections of the Administrative Draft Environmental Impact Report for which sufficient data has been submitted. This working draft can be incrementally updated as outstanding technical reports are submitted.

Please direct questions to Erec DeVost (edevost@ene.com) or 415-398-5326.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Chiang". The signature is fluid and cursive.

Eric Chiang  
CPUC Project Manager  
cc. Jerry Sirski, USFS

# Attachment 1

## Table 1: North-South Pipeline Project Deficiency Items

DG#	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Deficiency Request #1 (July 7 <sup>th</sup> , 2014), and #2 (April 15, 2015) <i>Deficiency items have been summarized, please refer back to original responses for complete text.</i>							
7.1	Alternatives	Pg. 7-1	More analysis is needed for the alternatives, including the no project alternative. Please note, “the discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly” (ICL 14(b)). The analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives, which will aid in any appropriate CEQA alternatives screening process.	7/07/2014	9/07/14	Incomplete	Because the Applicant has yet to furnish baseline environmental detail (See DG # 5.1.1, 5.3.1, 5.4.1, 5.5.1, 5.6.1, 5.7.1 and 5.15.1) it is not possible to design alternatives that avoid or reduce environmental impacts, or make such a determination for the Alignment Alternatives presented in Section 7.3 of the PEA. It is possible that additional alignment alternatives will need to be devised and surveyed, to fulfill this deficiency request.

# Attachment 1

## Table 1: North-South Pipeline Project Deficiency Items

DG#	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
3.1	Project Description	Pg. 7-5	<p>Please provide GIS data for the following project components:</p> <ul style="list-style-type: none"> <li>• Existing Components</li> <li>• Pipeline Center Line (CL)</li> <li>• Staging areas</li> <li>• Extra work spaces</li> <li>• Temporary and permanent impact areas</li> <li>• Adjacent facilities (PL, transmission lines, railroad, etc.).</li> <li>• Access roads</li> <li>• Special construction areas (HDD, blasting, steep slopes)</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Valve locations</li> <li>• Mileposts</li> <li>• Survey areas</li> </ul>	7/07/14	01/20/15	Incomplete	<p>On 01/20/14 the Applicant provided:</p> <ul style="list-style-type: none"> <li>• Access roads</li> <li>• Surveys areas</li> <li>• CL</li> <li>• Staging areas</li> </ul> <p>The following GIS data is still needed:</p> <ul style="list-style-type: none"> <li>• Extra work spaces</li> <li>• Temporary and permanent impact areas</li> <li>• Adjacent facilities (PL, transmission lines, railroad, etc.).</li> <li>• Special construction areas (HDD, blasting, steep slopes, etc.)</li> </ul> <p>Additional Data Requested:</p> <ul style="list-style-type: none"> <li>• Valve locations</li> <li>• Mileposts</li> </ul>
3.2	Project Description	Pg. 3-38	Please include additional information about the operation and maintenance of the North-South PL system.	7/07/14	9/07/14	Complete	See Attachment A of the Applicant's 7/7 response.
5.1.1	Aesthetics	Pg. 5-12	Please provide visual simulations of the project from prominent public views.	7/07/14	9/07/14	Incomplete	Applicant will provide simulations along with a Visual Resources Technical Report by May 1, 2015.
5.2.1	Agricultural Resources	Pg. 5-35	Please provide additional APMs to address potential impacts to agricultural resources in the event of additional ROW is needed.	7/07/14	9/07/14	Complete	See Response to Question #5 in the Applicant's 9/7 submittal.
5.3.1	Air Quality & GHG	Pg. 5-110	Please provide additional APMs to reduce potential significant GHG impacts. Please note that studies do not reduce impacts and are not considered APMs in and of themselves.	7/07/14	9/07/14	Incomplete	Air Quality Technical report that includes APMs to reduce potentially significant impacts will be provided by June 1, 2015

## Attachment 1

### Table 1: North-South Pipeline Project Deficiency Items

DG#	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
5.4.1	Biological Resources	Pg. 5-117	Please Provide a Biological Resources Technical Report (BTR) and associated GIS data.	7/07/14	9/07/14	Incomplete	The Applicant will furnish a BTR by July 30, 2015
5.4.2	Biological Resources	Pg. 5-150	Please provide a more detailed discussion of potential biological impacts that may occur during the operation and maintenance phase of the project.	7/07/14	9/07/14	Incomplete	Potential operations and maintenance impacts will be addressed in the BTR.
5.5.1	Cultural Resources	Pg. 5-343	Please provide copies of all correspondence information furnished to local Native American tribes.	7/07/14	9/07/14	Complete	See response to question #9 of the Applicant's 9/7 response.
5.5.2	Cultural Resources	Pg. 5-259	Please provide a Cultural Resources Technical Report	3/20/15			The Cultural Resources and Paleontological Technical Report will be provided on July 1, 2015
5.6.1	Geo./Soils	Pg. 5-381	Please provide a more detailed fault and seismicity map along with a shrink/swell map.	7/07/14	9/07/14	Incomplete	The Applicant will provide a Geology and Soils Report and a Geotechnical Investigation Report on May 1, 2015.

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### Table 1: North-South Pipeline Project Deficiency Items

DG#	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
5.7.1	Hazards	Pg. 5-409	Please provide: <ul style="list-style-type: none"> <li>• Impact analysis for gas odorizing agents</li> <li>• An EDR</li> <li>• Hazards Substance Control and Emergency Response Plan</li> <li>• Site Specific Health and Safety Plan</li> <li>• Health Risk Assessment</li> <li>• WEAP</li> <li>• List of all chemicals used during construction and operation</li> </ul>	7/07/14	9/07/14	Incomplete	The Applicant will provide an Air Quality Technical Report by June 1, 2015. The report will address potential impacts resulting from the use of gas odorizing agents.  A Hazards and Hazardous Materials Report will be provided by May 15, 2015.  A safety study will be provided by May 15, 2015  An EDR will be provided in May (2015)  A Health Risk Assessment will be provided in May (2015)  The applicant responded that all other information would be developed prior to project initiation. CPUC will determine if an adequate EIR can be developed without the requested data.
5.8.1	Hydrology and Water Quality	Pg. 5-439	Please provide flood zone maps for the project area	7/07/14	9/07/14	Complete	See Attachment C to the Applicant's 9/7 response.

## Attachment 1

### Table 1: North-South Pipeline Project Deficiency Items

DG#	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
5.8.2	Hydrology and Water Quality	Pg. 5-439	Please provide a Wetland Delineation Report that includes the jurisdictional extent of all potential Waters of the United States and Waters of the State within the proposed project corridor or that could otherwise be impacted by the proposed project. The Wetland Delineation Report should also include the jurisdictional extent of waters regulated by CDFW under Section 1600 et seq of the California Fish and Game Code. If available, please also include all correspondence from the United State Army Corps of Engineers pertaining to a preliminary jurisdictional determination of Waters of the United States.	3/20/15			The Applicant will also provide a Hydrology and Water Quality study by May 1, 2015.
5.11.1	Noise	Pg. 5-500	Please submit a detailed noise analysis that outlines the sources of construction and operational noise, and quantify the worst case scenario impacts that may be experienced by adjacent sensitive receptors.	4/15/2015			
5.15.1	Traffic and Transportation	Pg. 5-545	Please provided a project specific Traffic Study that identifies the level of service degradation to existing transportation systems that would likely result during construction and operation of the project.	7/07/14 Expanded 3/20/15	9/07/14	Incomplete	The Applicant will provide a Traffic Study by May 1, 2015.

## Attachment 2

### SoCalGas North-South Project Technical Report Schedule Update (current as of 4/17/15)

***All information presented herein is the work product of SoCalGas as presented to the California Public Utilities Commission (CPUC) on April 17, 2015.***

Report	Anticipated Start	Anticipated Finish	Status
Biological Technical Report	7/31/14	7/30/15	All biological resource surveys have been scheduled to allow for a completed Biological Technical Report to be prepared on schedule for 2015.
			2014 Fall Plant Surveys – 100% Complete
			2014 Desert Tortoise Surveys – 100% Complete
			JD Surveys – 100% Complete
			Fairy Shrimp Surveys – 50% Complete (assuming no additional rain), Dry Season Survey will occur in July.
			Burrowing Owl Surveys – the first of four survey passes is complete for all areas except Reche Canyon, total effort = 20% Complete.
			Winter Raptor Surveys – 100% Complete
			Swainson’s Hawk Surveys – 17% Complete
			Vegetation Mapping – 60% Complete
			Arroyo Toad – Habitat Assessment Complete, Focused Surveys 33% Complete
			Small Mammal Surveys - Habitat Assessment Complete, Focused Surveys Pending

<b>Report</b>	<b>Anticipated Start</b>	<b>Anticipated Finish</b>	<b>Status</b>
			Mohave Ground Squirrel - 8% Complete
			Bat Surveys - 17% Complete
			Spring Plant and Weed Surveys – 25% Complete
			To be initiated in mid-April: tree surveys, coastal California gnatcatcher surveys, and riparian bird surveys,
			Assuming presence for Stephens' kangaroo rat
Visual Resources Technical Report	3/1/15	5/1/15	Work has been initiated
Land Use Report	3/1/15	6/1/15	Work has been initiated
Air Quality and Greenhouse Gas Technical Report	3/1/15	6/1/15	Work has been initiated
Noise Analysis Report	3/1/15	5/1/15	Work has been initiated
Traffic Study	3/1/15	5/1/15	Work has been initiated.
Geology and Soils Report	3/1/15	5/1/15	Work has been initiated
Hydrology/Water Quality Report	3/1/15	5/1/15	Work has been initiated
Hazards/Hazardous Materials	3/1/15	5/15/15	Work has been initiated
Safety Study	3/1/15	5/15/15	Work has been initiated
Socioeconomics/ Environmental Justice Technical Memorandum	3/1/15	5/15/15	Work has been initiated
Paleontological/Cultural Resources Report	3/1/15	7/1/15	Work has been initiated