

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 26, 2018

VIA MAIL AND EMAIL

Mr. Tim Lyons  
Regulatory Case Manager II  
San Diego Gas and Electric Company  
8315 Century Park Court  
San Diego, CA 92123

**Re: Comments on Proponent's Environmental Assessment for the San Diego Gas & Electric Company's (SDG&E's) San Marcos – Escondido Transmission Line (TL6975) 69kV Project**

Dear Mr. Lyons,

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has conducted a preliminary review of San Diego Gas and Electric's (SDG&E) Proponent's Environmental Assessment (PEA) for SDG&E's proposed San Marcos – Escondido Transmission Line (TL 6975) 69kV Project (Project). The attached review was conducted to determine adequacy relative to the CPUC's PEA Checklist for Transmission Line Projects (October 7, 2008).

The information contained in the PEA for the Proposed Project is currently deficient of the items listed in the attached document. In order to assist the project proponent team to file its application and PEA in a form which can be deemed complete in a timely manner, this document describes the additional information required for the CPUC to conduct our CEQA reviews.

In addition to the aforementioned information, the Energy Division may request additional data, as necessary, to prepare a complete and adequate analysis of the potential environmental effects of the Project in accordance with the requirements of CEQA.

Please provide the information request in electronic form (Adobe pdf and word files) and hard copy to both CPUC and ESA no later than February 28, 2018. Please do not hesitate to call me at (415) 703-1966 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Orsaba".

Lisa Orsaba  
Project Manager  
Energy Division, CEQA Unit

Cc: Lon Maier, Supervisor  
Molly Sterkel, Program Manager  
Geoff Dryvynsyde, Legal Division  
Marcelo Poirier, Legal Division  
Michael Manka, ESA

Attachment:

1) Deficiency Report #2

# Deficiency Report #2 for the SDG&E Tie Line 6975 San Marcos – Escondido 69 kV Project (A.17-11-010)

## Report Overview

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company's (SDG&E) application A.17-11-010 and Proponent's Environmental Assessment (PEA) for a Permit to Construct the TL 6975 Project. Deficiencies were identified using the CPUC PEA Checklist (CPUC, October 2008) and the CPUC Information and Criteria List. Deficiencies are presented (via PEA Checklist numbering) as follows:

### Section 2.2 – Project Objectives

Per the PEA checklist – Analysis of the reason why attainment of these objectives is necessary or desirable. Such analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives which will aid any appropriate CEQA alternatives screening process.

- Provide the updated system data relevant to the project area transmission system including the most recent ten-year load forecasts.

### Section 3.1 – Project Location

Per the PEA checklist – Describe if the Proposed Project is located within an existing property owned by the Applicant, traverses existing rights of way (ROW) or requires new ROW. Give the approximate area of the property or the length of the project that is in an existing ROW or which requires new ROWs.

- Provide figures and GIS data showing the approximate rights-of-way (ROW). For Segment 1 – distinguish between the proposed new ROW and existing ROW. The preferred format for revised figures would be to incorporate the ROW layer onto the Appendix 3 figures.

### Section 3.2 – Existing System

Per the PEA checklist - Describe the local system to which the Proposed Project relates; include all relevant information about substations, transmission lines and distribution circuits. **Note: regional system maps would remain confidential for security reasons.**

- Provide schematic diagrams showing the layouts and profile (horizontal) views of the existing San Marcos and Escondido substations. The CPUC also requests the same diagrams showing the proposed project (this request is repeated under Section 3.5.4)
- **May be delivered as confidential** – Provide the power flow plots for the existing system, including the San Marcos and Escondido substations.

### Section 3.5.1 Transmission Line

Per the PEA checklist - Describe what would occur to other lines and utilities that may be collocated on the poles to be replaced (e.g., distribution, communication, etc.).

- Section 3.7.1.3 notes that approximately 360 linear feet of underground conduit would be installed from new poles to intercept locations along existing conduit packages. How deep would trenches be for installation of the underground conduit?

### **Section 3.5.4 – Substations**

Per the PEA checklist - Provide “typical” Plan and Profile views of the proposed substation and the existing substation if applicable.

- Provide schematic diagrams showing the layout and profile (horizontal) views for the Proposed Project San Marcos and Escondido substations. Layout diagrams of the existing substations was provided in response to Deficiency Report #1, provide the same layout with the Proposed Project changes.

### **Section 3.6 – Right-of-Way Requirements**

Per the PEA checklist - Describe the ROW location, ownership, and width. Would existing ROW be used or would new ROW be required? If new ROW is required, describe how it would be acquired and approximately how much would be required (length and width).

- As requested under Section 3.1 – provide GIS data for the project alignment ROW. Include both existing and proposed ROW.

#### **Section 3.7.1.1 – Staging Areas**

Per the PEA checklist - Describe any grading activities and/or slope stabilization issues.

- Describe the likely extent of grading activities and other ground disturbing activities for each of the proposed staging areas.

#### **Section 3.7.1.3 – Access Roads and/or Spur Roads**

Per the PEA checklist - Identify approximate location of all access roads (by type) in the GIS database.

- The alignments of spur roads are not apparent in Appendix 3-A (four new spur roads totaling 225 linear feet, each 14 feet wide). Provide the alignment information in both GIS and on updated Appendix 3 figures.

#### **Section 3.7.1.4 – Helicopter Access**

Per the PEA checklist - Identify which proposed poles/towers would be removed and/or installed using a helicopter.

- Identify which poles are proposed for removal or installations using a helicopter.

#### **Section 3.7.1.5 – Vegetation Clearance**

Per the PEA checklist - For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.

- Identify which areas will require tree removal. Provide data in GIS format.

#### **Section 3.7.2.1 – Pull and Tension Sites**

Per the PEA checklist - If conductor is being replaced, how would it be removed from the site?

- Describe how conductor cable would be removed from the site.

### **Section 3.7.5 – Construction Workforce and Equipment**

Per the PEA checklist - Provide a list of the types of equipment expected to be used during construction of the Proposed Project as well as a brief description of the use of the equipment.

- Table 3-10 of the PEA does not include a dump truck for material haul (only field crane/line truck and fork lift reference). Verify that a dump truck is not needed.
- Specify the number and/or capacity of haul trucks for importing and exporting materials.

### **Section 3.7.6 – Construction Schedule**

Per the PEA check - Provide a Preliminary Project Construction Schedule; include contingencies for weather, wildlife closure periods, etc.

- Provide the general hours of construction.
- Describe the estimated frequency (number of days per year) and duration of nighttime construction.

### **Section 3.8 – Operation and Maintenance**

Per the PEA checklist - If additional full time staff would be required for operation and/or maintenance, provide the number and for what purpose.

- Provide an estimate on the frequency of road maintenance (i.e. annually, every xx years).
- If necessary, provide an estimate of the frequency and duration of helicopter use during operation and maintenance activities.

### **Section 5.4 – Biological Resources**

Per the PEA checklist - Provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided.

- Provide a copy of the 2017 Revised HCP
- Expand the description in Section 3.8.4 regarding SDG&E's parameters for herbicide use for vegetation control (e.g., notification/site posting, allowable herbicide types, application method, max quantity per acre per year, etc.).

Per the PEA checklist - Within the Environmental Impact Assessment Summary, for impacts where a number of mitigation measures are available to reduce impacts, each mitigation measure should be discussed and the basis for selecting a particular mitigation measure should be stated.

- For APM BIO-5, in the instance that impacts on sensitive plants are unavoidable, additional mitigation is needed to ensure that impacts to rare plants would be less than significant. Such mitigation is deferred in the APM and is not provided in the SDG&E Subregional NCCP. Please elaborate in APM BIO-5 on the following elements that would be included in the Plant Salvage Plan: what plants would most likely be encountered, methods for plant salvage or seed collection, how suitable planting areas would be determined, replanting methods, the need for supplemental watering and weeding, and numerical success criteria related to vegetation cover and survival success. The measure additionally should also state the duration of the post-planting monitoring effort (e.g., 5 years) and include contingency measures if annual monitoring goals are not met.

## Section 5.5 – Cultural Resources

Per the PEA checklist - For each resource area discussion, the PEA must include the following:

- A description of the physical environment in the vicinity of the project (e.g. topography, land use patterns, biological environment, etc.)
  - local environment (site-specific)
  - regional environment
- A description of the regulatory environment/context
  - Federal
  - State
  - Local
- Provide a description of the local or regional environment.

Per the PEA checklist – In addition to an Impacts Analysis: Cultural Resources Report documenting a cultural resources investigation of the Proposed Project. This report should include a literature search, pedestrian survey, and Native American consultation.

- ***May be delivered as confidential*** – Provide copies of the cultural resources reports in support of the project. The reports should include a summary of the literature search, pedestrian survey, and Native American outreach conducted.
- Provide a description of the built environmental resources, specifically the existing project substations and the transmission lines to be rebuilt. Provide the age of the resources and whether they would qualify as historical resources.
- ***May be delivered as confidential*** - Resource P-37-033635, a historic-period road segment dating to the 1800s, has been evaluated as not eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) based on survey observations only. If the resource is to be considered not eligible then additional research and a formal evaluation of the resource are required. Alternatively, the resource may be considered eligible for the purposes of the project and mitigation measures for avoidance should be implemented. If avoidance is not feasible, provide the additional research and evaluation.

Per the PEA checklist - Provide a copy of the records found in the literature search.

- ***May be delivered as confidential*** – Provide copies of the records found as part of the literature search.

Per the PEA checklist - Provide a copy of all letters and documentation of Native American consultation.

- ***May be delivered as confidential*** – The Sacred Lands File search results and outreach letters to Native American groups are appended to the PEA. However, this does not represent the entirety of the communication summarized in the reports. Provide copies of the call and/or meeting logs and notes, as well as any written responses by Native American groups.

## Section 5.7 – Hazards and Hazardous Materials

Per the PEA checklist - For each resource area discussion, the PEA must include the following:

- A description of the physical environment in the vicinity of the project (e.g. topography, land use patterns, biological environment, etc.)
  - local environment (site-specific)
  - regional environment
- A description of the regulatory environment/context
  - Federal
  - State
  - Local
- Was a Phase I Environmental Site Assessment prepared for the acquired area? If yes, please provide.
- Provide a table of the standard environmental records/databases reviewed and the search distances. There's a table on page 399/677, but it doesn't seem to cover all of the records reviewed. It appears they all may have a 1/2-mile search radius, please confirm.
- Provide a discussion of the local Certified Unified Program Agencies (CUPA) for the project area.

### **Section 5.8 - Hydrology and Water Quality**

Per the PEA checklist - Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact.

- Provide copies of the following:
  - The SDG&E Construction Water Sourcing Investigation Plan
  - SDG&E BMP Implementation Plan
  - Will-serve letter from VWD dated October 19, 2017

Per the PEA checklist - Describe impacts to groundwater quality including increased run-off due to construction of impermeable surfaces, etc.

- Provide confirmation that operation work pads/maintenance work pads would not be paved.

### **Section 5.15 - Transportation and Traffic**

Per the PEA Checklist - Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact.

- Include Interstate 5 (I-5) in the description of regional access. Given the location of some of the potential staging yards identified in the Project Description, it seems possible and likely that a notable amount of construction traffic would use I-5 to access the project site.
- Provide further discussion of criteria used to select the "Project Area Major Roadways" characterized in Table 4.17-2. Does this selection of roadway segments take into account the locations of potential staging yards.
- Provide further explanation of methodology used to calculate LOS for roadways without published LOS values. What value was used in the vehicles-per-hour-per-lane capacity assumption.

Per the PEA Checklist - Provide a preliminary description of the traffic management plan that would be implemented during construction of the Proposed Project.

- Provide an estimate of the maximum number of daily truck trips during peak construction, similar to what was done for employee trip estimates. These should not only include “deliveries of construction items and equipment” (as stated in the PEA), but also truck trips associated with importing and exporting soil, concrete pours, etc.
- Identify which overlapping construction activities would generate the greatest number of construction worker and truck trips over the course of the 12-month construction timeframe. What would be the approximate duration of this peak of construction activity?
- Include a statement regarding the dispersion of construction trips across multiple construction staging areas, if this is in fact the case.