

**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses  
A.15-09-013 Pipeline Safety & Reliability Project (PSRP or Proposed Project)  
California Public Utilities Commission (CPUC) Data Request No. 05 – October 31, 2017**

DG#	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	Data Gap (DG) Question	Response																																			
DG 4.1-2-1 Follow Up 1	Aesthetics	Revised Avenue of Nations Simulation submitted 9/14/2017	<p><b>Provide an assessment of route variation feasibility at Avenue of Nations.</b> The route of Line 3602 in the vicinity of MP 43.5 is currently proposed to run generally south from the intersection of Pomerado Road and Avenue of Nations for approximately one-quarter mile before turning generally east. The first 500 feet of this section of the pipeline route is located adjacent to the west side of Avenue of Nations. Much of the quarter-mile section of the cleared ROW would ascend the hillslope to the south, be visible from the vicinity of the intersection and Avenue of Nations, and potentially produce significant aesthetic impacts. Provide potential route segment alternatives for this quarter-mile section of the proposed route to reduce the aesthetic impact of the cleared pipeline ROW ascending the hillslope. Consider options for route segment alternatives that include: 1) angling the route (or using multiple angles in the route) to avoid straight-line views of it ascending the hillslope, 2) relocating the route farther west of the intersection of Pomerado Road and Avenue and Nations, and 3) relocating the route to turn south from Pomerado Road between approximately 500 and 4,500 feet east of the intersection of Pomerado Road and Avenue of Nations. If no route segment alternatives are determined feasible, provide detailed explanations of why they are not feasible.</p>	<p>SDG&amp;E and SoCalGas (Applicants) reviewed several potential alternatives to the currently proposed route segment south of Pomerado Road at Avenue of Nations. Two feasible potential route segment alternatives, Option 1 and Option 2, are carried forward herein for further analysis and are shown in Exhibit EE: Avenue of Nations Route Alternatives Map. For your convenience, a KMZ file for Option 1 and Option 2 is provided in Confidential Exhibit FF: Avenue of Nations Route Alternatives KMZ File, which contains <b>confidential information provided pursuant to California Public Utilities Code § 583, General Order 66-C, D.16-08-024, and the accompanying declaration.</b></p> <p>Option 1 would locate the route approximately 120 feet to the west of its current proposed location, which is south of Pomerado Road, and would angle to the east in the vicinity of the hillside where the cleared right-of-way (ROW) is visible. Option 2 would be located another approximately 80 feet farther west of Option 1 and would proceed in a straight line to the southeast, eventually turning east to rejoin the originally proposed alignment south of the private road that travels east-west within the University of California, San Diego's Elliott Chaparral Reserve (Reserve).</p> <p>Option 1 would potentially reduce views of the cleared ROW from the intersection of Pomerado Road and Avenue of Nations and from Avenue of Nations south of the intersection. Portions of the ROW would still be visible to motorists along Pomerado Road west of the intersection. In addition, as the Option 1 route rejoins the originally proposed route, a portion of the cleared ROW as it ascends the hillside would continue to be visible from the intersection of Pomerado Road and Avenue of Nations.</p> <p>Option 2 would potentially further reduce views (as compared to Option 1) of the cleared ROW from the intersection of Pomerado Road and Avenue of Nations and from Avenue of Nations south of Pomerado Road. Portions of the route under this option would potentially still be visible to motorists along Pomerado Road, and could still potentially affect views of the hillside.</p> <p>While aesthetic impacts associated with Option 1 and Option 2 may be reduced or altered, other biological and hydrological impacts may be greater. Table 1: Potential Vegetation Impacts of the Alternative Route Options compares the results of a desktop analysis on the potential impacts to vegetation communities associated with Option 1 and Option 2.</p> <p align="center"><b>Table 1: Potential Vegetation Impacts of the Alternative Route Options</b></p> <table border="1"> <thead> <tr> <th data-bbox="1507 1257 1874 1387" rowspan="2">Vegetation Community</th> <th colspan="3" data-bbox="1874 1257 2775 1338">Potential Impacts (acres)</th> </tr> <tr> <th data-bbox="1874 1338 2296 1387">Proposed Route</th> <th data-bbox="2296 1338 2536 1387">Option 1</th> <th data-bbox="2536 1338 2775 1387">Option 2</th> </tr> </thead> <tbody> <tr> <td data-bbox="1507 1387 1874 1435">Chamise Chaparral</td> <td align="center" data-bbox="1874 1387 2296 1435">0.10</td> <td align="center" data-bbox="2296 1387 2536 1435">0.00</td> <td align="center" data-bbox="2536 1387 2775 1435">0.48</td> </tr> <tr> <td data-bbox="1507 1435 1874 1483">Disturbed Habitat</td> <td align="center" data-bbox="1874 1435 2296 1483">0.07</td> <td align="center" data-bbox="2296 1435 2536 1483">0.37</td> <td align="center" data-bbox="2536 1435 2775 1483">0.00</td> </tr> <tr> <td data-bbox="1507 1483 1874 1532">Eucalyptus Woodland</td> <td align="center" data-bbox="1874 1483 2296 1532">3.45</td> <td align="center" data-bbox="2296 1483 2536 1532">0.00</td> <td align="center" data-bbox="2536 1483 2775 1532">3.82</td> </tr> <tr> <td data-bbox="1507 1532 1874 1580">Scrub and Chaparral</td> <td align="center" data-bbox="1874 1532 2296 1580">0.00</td> <td align="center" data-bbox="2296 1532 2536 1580">0.12</td> <td align="center" data-bbox="2536 1532 2775 1580">0.00</td> </tr> <tr> <td data-bbox="1507 1580 1874 1628">Woodland</td> <td align="center" data-bbox="1874 1580 2296 1628">0.00</td> <td align="center" data-bbox="2296 1580 2536 1628">3.82</td> <td align="center" data-bbox="2536 1580 2775 1628">0.00</td> </tr> <tr> <td data-bbox="1507 1628 1874 1677">Urban/Developed</td> <td align="center" data-bbox="1874 1628 2296 1677">0.16</td> <td align="center" data-bbox="2296 1628 2536 1677">0.00</td> <td align="center" data-bbox="2536 1628 2775 1677">0.40</td> </tr> <tr> <td data-bbox="1507 1677 1874 1725"><b>Total</b></td> <td align="center" data-bbox="1874 1677 2296 1725"><b>3.78</b></td> <td align="center" data-bbox="2296 1677 2536 1725"><b>4.31</b></td> <td align="center" data-bbox="2536 1677 2775 1725"><b>4.70</b></td> </tr> </tbody> </table>	Vegetation Community	Potential Impacts (acres)			Proposed Route	Option 1	Option 2	Chamise Chaparral	0.10	0.00	0.48	Disturbed Habitat	0.07	0.37	0.00	Eucalyptus Woodland	3.45	0.00	3.82	Scrub and Chaparral	0.00	0.12	0.00	Woodland	0.00	3.82	0.00	Urban/Developed	0.16	0.00	0.40	<b>Total</b>	<b>3.78</b>	<b>4.31</b>	<b>4.70</b>
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				<p>As shown in Table 1: Potential Vegetation Impacts of the Alternative Route Options, Option 1 and Option 2 would both result in greater potential impacts to vegetation communities than the proposed route. In addition, all three routes would cross one known jurisdictional drainage in the area; thus, impacts to jurisdictional waters would be similar. There is no critical habitat in the area; therefore, no impacts to critical habitat are anticipated for either the Proposed Project or the two alternatives in this area. Lastly, each of the routes would be located within the Reserve. The Proposed Project route, Option 1, and Option 2 would each result in 3.78, 4.31, and 4.70 acres of disturbance to the Reserve, respectively.</p> <p>Two other potential alignments farther to the east were considered, but were rejected and determined to be infeasible due to existing underground infrastructure, lack of space for construction, conflict with structures, and/or an increase in impacts to native habitat. The following proposed alignments were ultimately rejected:</p> <ul style="list-style-type: none"> <li>• A corridor located approximately 2,050 feet east of the proposed alignment was considered, but found to be infeasible because it was occupied by very large water aqueducts (with diameters measuring approximately 96 inches, 84 inches, and 69 inches) and an overhead 69 kV electric power line. Expanding the utility corridor beyond the existing width was considered infeasible as that land is encumbered with residential housing units and structures associated with the Alliant International University campus. (See Exhibit EE: Avenue of Nations Route Alternatives Map.)</li> <li>• The potential to use the paved road known as the Chabad Center Driveway, located approximately 4,700 feet to the east of the proposed alignment, was also considered but determined to be infeasible. This road is a relatively narrow, private, dead-end road serving two properties. Both properties are under active development with high-density housing currently being constructed. The narrowness of the roadway does not provide suitable room for construction while allowing the property owners to utilize their property consistent with its development. Even if the obstacles of the narrow construction corridor and the development of new housing structures could be mitigated, the route would continue to the west through undeveloped land, potentially along the ridgeline, until intersecting the existing alignment along the San Diego County Water Authority's aqueduct corridor. This would result in a notable increase in disturbance of native habitat compared to the existing alignment in Pomerado Road. The narrow driveway, combined with the development of land with housing units and the likely increase in environmental impacts to native habitat, render this potential route segment alternative infeasible.</li> </ul>
DG 4.4-1 Follow Up 2	Biological Resources	Wetlands Delineation Report submitted 2/10/17	<b>Provide GIS data for formal wetland delineation requested on 8/29/2017.</b> Provide the GIS shapefiles for all wetland and waters delineated in the 2016 surveys described in the Wetlands Delineation Report submitted on 2/10/2017.	Geographic Information System (GIS) shapefiles for all wetlands and waters delineated in the 2016 surveys—as described in the Wetlands Delineation Report submitted on February 10, 2017—are provided as Exhibit GG: Wetlands Delineation Report Shapefiles.
DG 4.4-5-1 Follow Up 2	Biological Resources		<b>Provide updated information about USFWS permitting strategy.</b> Provide results from follow-up communications with USFWS and/or their solicitor regarding the proposed permitting strategy. Include any feedback or responses relating to the preliminary permitting approach, or any new permitting approaches.	<p>Since the Applicants' August 22, 2017 response to Energy Division PEA Data Request No. 3, the Applicants have had one follow-up communication with the United States Fish and Wildlife Service (USFWS). On October 17, 2017, shortly after the Applicants received this data request, we reached out to the USFWS to request an update regarding our federal Endangered Species Act (ESA) permitting strategy. The USFWS indicated it had not yet discussed the Applicants' permitting strategy for the Proposed Project with its solicitor.</p> <p>As Applicants indicated during a May 10, 2017 meeting with the CPUC, USFWS, and California Department of Fish and Wildlife (CDFW), a determination on what method Applicants will use for Endangered Species Act (ESA) compliance will not be finalized until more information is known about the chosen project. As such, Applicants recommend that the draft Environmental Impact Report (EIR) reflect all ESA compliance options discussed during the May 10 meeting. Please see Applicants' August 22, 2017 response to Energy Division PEA Data Request No. 3 for details on compliance options.</p>

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DG 4.4-8.2 Follow Up 2	Biological Resources		<p><b>Collect available data for route alternatives and non-Miramar alternatives.</b></p> <p>Provide a written report containing the results of the 2017 Quino checkerspot butterfly surveys. Include associated GIS data for the 2017 Quino checkerspot butterfly surveys.</p>	<p>The results of the Applicants' 2017 Quino checkerspot butterfly surveys along Tie Lines 636 and 639 are provided in Exhibit HH: Results of 2017 Quino Checkerspot Butterfly Surveys. The associated GIS data is provided in Exhibit II: Quino Checkerspot Butterfly Survey GIS Files.</p>
DG 4.5-13	Cultural Resources	<p>Exhibit LL-C_Response to 1-4-5-1_RevisedSurveyReport(CONFIDENTIAL) - Cultural Resource Survey Report for the San Diego Gas &amp; Electric Company and Southern California Gas Company Pipeline Safety &amp; Reliability Project, San Diego County, California - September 2015 (Revised February 2016): Table 1 - Previously Recorded Cultural Resources within the APE, and Section 5.2 Tables B1 and B2</p>	<p>Please provide specific information (e.g., destroyed, vegetation, etc.) for why each of the following sites were not able to be re-identified as part of the recent surveys:</p> <ul style="list-style-type: none"> <li>• P-37-000585</li> <li>• P-37-004556 - Warn 1976, Cupples 1976</li> <li>• P-37-005072 - Cupples 1976, Eckhardt 1977</li> <li>• P-37-006001</li> <li>• P-37-006722 - Franklin 1978 as noted in Table 1 (This citation may refer to Franklin, Randy &amp; Richard Carrico 1979 or Carrico, Richard and Randy Franklin 1979 as noted in Table B1)</li> <li>• P-37-007836 - Cook 1978 (for Moosa Creek)</li> <li>• P-37-019199 - Hilton 2000</li> </ul> <p>Please provide the reports (as noted above) affiliated with each of these site locations for all those that still may be present.</p>	<p>The following sites were not identified/re-identified as part of the recent surveys for the following reasons:</p> <ul style="list-style-type: none"> <li>• P-37-00585 – The original site record is undated, but is approximately from the 1960s. The site has not been identified in several survey efforts and is likely mapped incorrectly.</li> <li>• P-37-04556 – This site is mapped incorrectly in the South Coast Information Center (SCIC) GIS layer. The actual location is on the opposite side of Interstate (I-) 15 from the Proposed Project's Area of Potential Effect (APE) based on the Department of Parks and Recreation (DPR) maps.</li> <li>• P-37-05072 – Approximately 75 percent of this resource was developed for a mobile home park and new construction on Old Highway 395. The portion of the site on private property outside of the proposed ROW was not accessed/surveyed.</li> <li>• P-37-06001 – This resource appears to be destroyed by highway construction.</li> <li>• P-37-06722 – This resource appears to be destroyed by agriculture use.</li> <li>• P-37-07836 – This resource is a redeposit of artifacts from five different prehistoric sites destroyed by I-15 construction. No visible signs of the resource are on the surface as the redeposits were placed in vaults underground.</li> <li>• P-37-19199 – Dense vegetation obscures the ground at this resource location; thus, the resource may still be present.</li> </ul> <p>DPR site records were included in Appendix D of the Revised Survey Report and Confidential Exhibit W of the Applicants' response to PEA Data Request No. 3. SDG&amp;E does not receive the reports referenced in Table B2 as part of a standard records search agreement with the SCIC. Nevertheless, the reports have been ordered, and the Applicants will provide them to the CPUC's archaeologist approximately two weeks from the date of this response.</p>

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DG 4.5-14	Cultural Resources	Exhibit LL-C_Response to 1-4-5-1_RevisedSurveyReport(CONFIDENTIAL) - Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - September 2015 (Revised February 2016): Table 1 - Previously Recorded Cultural Resources within the APE, Section 5.2, and Tables B1 and B2	<p>Several of the previously identified sites were noted as not being evaluated, but are located within the APE. Please provide the reports for the following sites in order to provide greater context to each of the individual sites:</p> <ul style="list-style-type: none"> <li>• P-37-00007 - Haenszel 1956, 1957</li> <li>• P-37-04634 - Tolles 1975, Hatley 1978, and Eighmey and Brogan 2000</li> <li>• P-37-04806 - Cupples 1976</li> <li>• P-37-010917 - Kyle 1988 (This citation may be Dennis, Carolyn Kyle, and Richard Carrico 1988 as noted in Table B1 )</li> <li>• P-37-010918 - Kyle 1988 (This citation may be Dennis, Carolyn Kyle, and Richard Carrico 1988 as noted in Table B1 )</li> <li>• P-37-011466 - Pigniolo, Andrew R. and Michael Baksh 1999</li> <li>• P-37-011467 - Pigniolo, Andrew R. and Michael Baksh 1999</li> <li>• P-37-012587 - Roth and Associates 1992 (Roth, Linda, 1992 32-acre Chang/Hsiu Property)</li> <li>• P-37-017538 - Pigniolo, Andrew R. and Michael Baksh 1999</li> <li>• P-37-017539 - Pigniolo, Andrew R. and Michael Baksh 1999</li> <li>• Gas Line 1600 - Bowden-Renna 2012</li> </ul>	<p>DPR site records were included in Appendix D of the Revised Survey Report and Confidential Exhibit W of the Applicants' response to PEA Data Request No. 3. SDG&amp;E does not receive the reports referenced in Table B2 as part of a standard records search agreement with the SCIC. Nevertheless, the reports have been ordered, and the Applicants will provide them to the CPUC's archaeologist approximately two weeks from the date of this response.</p>
DG 4.5-15	Cultural Resources	Exhibit LL-C_Response to 1-4-5-1_RevisedSurveyReport(CONFIDENTIAL) - Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - September 2015 (Revised February 2016): Section 5.2 and Table B2	<p>The following sites appear to be located within the APE defined within the Revised Survey Report (Exhibit LL-C_Response to 1-4-5-1 noted herein) based on the GIS shapefiles and site forms received in response to Data Request DG 4.5-5 on August 22, 2017. Confirm that these sites are not in the APE, as well as provide the reports documenting them:</p> <ul style="list-style-type: none"> <li>• P-37-010785 - Chace and Collins 1987; Huey and Baker 1992 (not shown as in APE)</li> <li>• P-37-013205 - Ogden Environmental 1992 (not shown as in APE)</li> <li>• P-37-019184 - Harris 2000 (not shown as in APE)</li> </ul>	<p>P-37-019184 is within Laydown #1A/Rainbow Station Yard; and P-37-010785 and P-37-013205 are within and adjacent to, respectively, Laydown #6A/Lake Hodges East Yard. These two yards were not included in the Revised Survey Report because they were later additions as part of the Applicants' PEA Minor Design Refinements to the Proposed Project (January 2017). The yards and mapped resources were surveyed in August 2016 with negative results. None of the three resources were observed during the surveys for those two yards. The mapped boundaries of P-37-019184 and P-37-013205 are within the direct APE of those yards, should they be used for the Proposed Project. The mapped boundary for P-37-010785 would be partially within the indirect APE for the Proposed Project for the Lake Hodges East Yard. Appendix D of the PEA Minor Design Refinements, which was provided to the CPUC in January 2017, documented these sites. SDG&amp;E does not receive the reports referenced in Table B2 as part of a standard records search agreement with the SCIC. Nevertheless, the reports have been ordered, and the Applicants will provide them to the CPUC's archaeologist approximately two weeks from the date of this response.</p>

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DG 4.5-16	Cultural Resources	Site Form 012919  Exhibit LL-C_Response to 1-4-5-1_RevisedSurveyReport(CONFIDENTIAL) - Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - September 2015 (Revised February 2016): Table 1 and Section 5.2	Please confirm that Site P-37-012919 consists of HP33. Ranch, AH4. Trash Scatter as noted in Table 1 and that this is the appropriate coding. The original site form as provided as part of the response to Data Request DG 4.5-5 on August 22, 2017 shows this site only as a dump site.  Please provide the report associated with this site location to provide further detail about this location (Jones and Stoke 2000).	The original site record mentions “wooden corral fencing across the creek, possibly associated with site,” which is why the HP33 Ranch coding was added. SDG&E does not receive the reports referenced in Table B2 as part of a standard records search agreement with the SCIC. Nevertheless, the reports have been ordered, and the Applicants will provide them to the CPUC’s archaeologist approximately two weeks from the date of this response.
DG 4.5-17	Cultural Resources	Exhibit LL-C_Response to 1-4-5-1_RevisedSurveyReport(CONFIDENTIAL) - Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - September 2015 (Revised February 2016): Section 5.2 Table B2  Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County, California. February 12, 2016	Please confirm if HP2. Single family residence, 443 W. 4th Avenue, Escondido is located within the APE defined within the Revised Survey Report (Exhibit LL-C_Response to 1-4-5).  The September 2015 (Revised February 2016) report (Exhibit LL-Response to 1-4-5_ shows it as being outside the APE, but the indirect survey report (February 12, 2016, Revised May 4, 2016) shows it as one of the sites to be evaluated suggesting it is included within the APE.	The single-family residence at 443 W. 4th Avenue in Escondido is not within the direct impact APE, but it is within the indirect impact APE for the Proposed Project. The Revised Survey Report only discusses sites within the APE that would be directly impacted by the Proposed Project, and the indirect survey report only discusses sites within the APE that could be indirectly impacted by the Proposed Project.

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		(Revised May 04, 2016)		