

November 3, 2014

Reg.12-10/A.14-04-011 SDG&E Sycamore-Penasquitos 230kV Transmission Line CPCN

Sent Via Sempra EDT System

Billie Blanchard Project Manager Energy Division, CEQA Unit 505 Van Ness Avenue San Francisco, CA 94102-3298

Re: SXPQ ED02-SDGE Partial Response No. 3

Dear Ms. Blanchard:

Attached please find SDG&E's third partial response to ED's Data Request 2 issued on October 6, 2014.

Included in this submittal are responses to Questions 1, 7, 12, 13, 15, 19- 22, 25-27, 29-63, 65-83, 86, 87, 91-102, 105, 106, 108-111, 114-116, 118, 120 and 121. Please note that attachments DR2-Q 109 and DR2-Project Refinement Report contain information considered confidential under the provisions of PUC Section 583 and General Order 66-C as well as under other applicable Federal and State Laws and Regulations. These documents are appropriately marked confidential and should be treated as such.

Responses to Questions 112,113,117 and 119 are expected to be submitted in approximately one month. If an evaluation for CRHR eligibility is required (Q112), a full evaluation would be conducted and the results would be submitted in early 2015. For Q104, the full results of the burrowing owl habitat assessment would be submitted in early 2015.

The attached responses to Data Request 2 also include refinements to the design for the Sycamore to Peñasquitos project based on additional engineering design work and field reviews of the proposed structure locations. These minor project changes are described in the "Project Refinements Report for the Sycamore to Peñasquitos 230 kV Transmission Line Project" that is included as Attachment DR2 – Project Refinement Report. Most of the project refinements were made to reduce potential impacts and/or improve constructability.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 636-6876 or e-mail: *RGiles@semprautilities.com*.

Sincerely,

<u>Signed</u>

Rebecca Giles Regulatory Case Manager

Enclosures

cc:

Allen Trial – SDG&E Elizabeth Cason – SDG&E Bradley Carter – SDG&E Central Files – SDG&E Peter Allen – CPUC Darryl Gruen- ORA Legal Jeff Thomas – Panorama Environmental Consulting Susanne Heim – Panorama Environmental Consulting May Jo Borak – CPUC Infrastructure Permitting and CEQA Molly Sterkel - CPUC Infrastructure Planning and Permitting Frank Ghazzagh – ORA

Q#	Data Needs Sections	Summary of SDG&E Response Submittals	Q#	Data Needs Sections	Summary of SDG&E Response Submittals
Q1-28	Project Description	10/24/14 Submittal 1: Q4, 5, 8, 18, 24 & 28	Q102-108	Biological Resources	10/31/14 Submittal 2: Q 103, 104, 107 11/3/14 Submittal 3: Q 102, 105, 106, 108
		10/31/14 Submittal 2: Q2,3,6, 9 ,10,11,14,16,17,23 11/3/14 Submittal 3: Q 1, 7, 12, 13, 15, 19, 20, 21, 22, 25, 26, 27			
Q29-81	Detailed Route Maps	10/24/14 Submittal 1: Q64 11/3/14 Submittal 3: Q 29-41, 42, 43-63, 65, 66- 81	Q109-112	Cultural Resources	11/3/14 Submittal 3: Q 109-111
Q82-86	Overview Maps	10/31/14 Submittal 2: Q84, 85 11/3/14 Submittal 3: Q82, 83, 86	Q113-115	Noise	11/3/14 Submittal 3: Q 113, 114, 115
Q87-90	Aesthetics	10/24/14 Submittal 1: Q87, 88, 89 (Updated) & 90	Q116	Recreation	11/3/14 Submittal 3: Q116
Q91-101	Air Quality/GHG Emissions	11/3/14 Submittal 3: Q91-101	Q117-121	Traffic	11/3/14 Submittal 3: Q 117, 118, 119, 120, 121

Responses Pending: Q104, 112, 113, 117, 119

CONFIDENTIAL ATTACHMENTS: Q9, Q109, Project Refinement Report

#	Ref	Question Description	SDGE Response
1	Data Request #1, Item 7	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. The following information is needed to define use and impacts within each staging yard:	Stonebridge – Currently being used for SDG&E staging for Fanita Junction project. SDG&E has the site leased until end of August 2015 with an option to extend one year to August 2016. Owned by San Diego County Water Authority. If needed, a separate consent to look at the site for Proposed Project can be provided but would not be available until after 11/04/14 or later since the contact is on vacation.
		 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 	Meanley – While SDG&E has been renting the site since 2004 for staging of materials for numerous projects, ownership changed hands as of September 30, 2014. New owner has plans to start construction on the site as soon as they can secure the permits from the City of San Diego. This could

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		 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 The CPUC received letters from the landowners of the Carmel Valley and Torrey Santa Fe staging yards stating that these staging yards are not available for use (Attachment 1). SDG&E needs to provide landowner verification that each of the proposed staging yards may be used by SDG&E for Project staging. If SDG&E cannot obtain landowner approval in writing, the staging yard must be removed from the project. Otherwise we do not have feasible yards for the project description to adequately analyze impacts for the whole of the project. 	 be 2nd or 3rd quarter of 2015. Therefore SDG&E has removed the site from consideration for the Proposed Project. Chicarita South – SDG&E received an email from the owner granting permission to SDG&E to survey the site for a staging yard and to potentially use it during construction (See Attachment DR2 – Q1(a)_Chicarita South Property Owner Letter). Camino Del Sur – SDG&E received verbal permission to survey and use site for staging. Due to vacation/travel conflicts, SDG&E anticipates receiving email confirmation from the property owner during the week of November 3rd. Torrey Santa Fe – The two parcels are owned by Kilroy Development who is actively working on building permits for both parcels. SDG&E has used both sites before, one for a completed Wood to Steel Project and the other for a Pipeline Integrity Project. For several months, both sites were used simultaneously as staging yards. There was one complaint from the neighborhood and that was addressed and resolved with the addition of screening on the fences. SDG&E will be meeting with representative from Kilroy to discuss schedules and possibility of SDG&E's use of the site again, if available, for the Proposed Project. Meeting is currently scheduled to occur during the week of November 3rd. Attachment DR2 – Q1(b)_Torrey Santa Fe aerial photo shows a recent time when both sites were being utilized as staging yards. SR-56 – During further discussions with Pardee Homes, it was determined that the original site submitted for staging on the ir property would be withdrawn and another site substituted. The new site is disturbed and has previously been used by SDG&E for a staging yard. This site has better access to major roads and SR-56 compared to the previous location. SDG&E has received verbal approval to proceed with surveying the site,

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			with an email confirmation anticipated to be received the week of November 3^{rd} . Stowe –SDG&E received a letter from the owner granting permission to SDG&E to survey the site for a staging yard and to potentially use it during construction (See Attachment DR2 – Q1(c)_Stowe Property Owner Letter). Given the fact that the start of construction is more than a year away and that property availability changes over time, SDG&E will continue to research and look for additional yards as-needed. The exact acreage of usable space at each potential staging yard site is not known at this time, and would need to be determined based upon actual availability at the time of construction. Typically, minor grading and vegetation removal could be required to prepare and use a staging yard. However, the proposed staging yards were chosen because they have been previously graded and grubbed (vegetation removed) ensuring that use by the Project would require minimally site preparation. Base materials (such as class II base and/or gravel) is often placed over the staging yard prior to use, and is removed at the end of use (unless the land owner requests the gravel stay in place). GIS data has been updated to depict the entrance points for each potential staging yard.
2	Data Request #1, Item 7	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.	Submitted with Response No. 2 on 10-31-14.
		Partial data response no. 3 states any of these substations and their access roads may be used for storing equipment. Show the areas that would be used for staging at the substations and the road segments that would be used for staging. The majority of these substation yards are built out and are not available for staging. Staging within the substation access road may restrict substation access. Describe how access to the	

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		substation will be maintained if the access road is used for staging.	
3	Data Request #1, Item 4 and 57	Clarify the location of the cable pole at the west end of the Segment B underground alignment. Identify the dimensions and locations of new right- of-way or easement that SDG&E needs to acquire in Segment B for the underground line proposed for Carmel Valley Road.	Submitted with Response No. 2 on 10-31-14.
		The preliminary engineering for the underground alignment shows a cable pole south of Carmel Valley Road at the west end of Segment B. The cable pole was previously proposed north of Carmel Valley Road within a new easement. Please clarify the location of the underground line and cable pole at the west end of the alignment and provide updated GIS accordingly. Please also clarify whether any new easements are required for the underground alignment and the dimensions and locations of the new easements.	
4	N/A	Provide representative photographs of the concrete pier and concrete micropile foundations proposed for the Project. The representative photographs need to be taken at close range to visually depict the types of foundation that SDG&E has proposed for this Project.	Submitted in Partial Response 1 dated 10/24/14
5	N/A	Provide a representative photograph of a bundled 230- kV line. The representative photograph need to be taken at close range to visually depict a bundled line with parallel wires spaced approximately 18 inches apart.	Submitted in Partial Response 1 dated 10/24/14
6	N/A	Provide schematics for a 69-kV steel cable pole, a 138-kV tubular steel pole (TSP), and a typical splice vault.	Submitted with Response No. 2 on 10-31-14.
7	Data Request #1, Item 9	Re-label the topped poles in the GIS data to match the pole IDs in the table provided in response to Item 9 (e.g., H- Frame Steel 1). Add the 69-kV topped 1 pole to the GIS. Provide a schematic or representative photograph of a	The GIS data (Attachment DR2 – Q25) has been updated to include all pole data including rating (230, 138, 69kV), pole type (TSP, H-frame, lattice tower), pole classification (dead end, tangent, cable pole), pole material (wood or steel), and pole height. Representative photos of what a topped

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		topped pole with distribution underbuild.	pole with distribution are included as Attachment DR2 – Q7.
		The pole labels in the GIS data provided to CPUC do not match the pole labels in SDG&E's response to Data Request #1. Please reconcile the two data sets so that the pole IDs are consistent and confirm that all poles that are proposed to be topped are included in the GIS data.	
8	N/A	Confirm that the existing 230-kV transmission line is being moved from E3 to P1 and P2 near Sycamore Canyon Substation.	Submitted in Partial Response 1 dated 10/24/14
9	Data Request #1, Item #1	Provide additional detail on the proposed modifications of the Sycamore Canyon, Peñasquitos, Chicarita, San Luis Rey, and Mission Substations.	Submitted with Response No. 2 on 10-31-14.
	#1	Additional detail is needed to define the proposed modifications at the Sycamore Canyon, Peñasquitos, Chicarita, San Luis Rey, and Mission Substations. What specifically will be occurring at these substations? Provide a detailed description of the activities involved in constructing the proposed modifications at each of the five substations.	
10	N/A	Identify any areas that may be used for material laydown during construction.	Submitted with Response No. 2 on 10-31-14.
		The PEA does not identify any areas for material laydown. Does SDG&E proposed to use access roads, pole work areas, or other areas for material laydown? Please define temporary laydown areas, materials that could be staged in the laydown areas, and duration of use for laydown areas.	
11	N/A	Confirm that helicopter refueling would not be conducted at any of the proposed work areas.	Submitted with Response No. 2 on 10-31-14.
		Limiting refueling to off-site airports limits SDG&E's options and increases the time and emissions associated with helicopter operations. If helicopter refueling in the Project	

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		area is not included in the Project Description it will not be allowed during construction without an approved petition for modification from the CPUC.		•		
12	N/A	Provide a detailed description of the activities that would be conducted to prepare the stringing sites. Would grading be required?	 Stringing sites may require brushing and/or minor grading to ensure a suitable and safe area for larger stringing equipment to operate. Ultimately, the terrain will determine if more than minor grading is required to improve the area. In areas where more than minor grading are required, engineered grading plans would be developed along with storm water prevention measures for the construction contractor to prepare the site. When grading is complete, the next step is to install anchors into the ground to support the wire until sleeving is completed. One method of anchoring would be digging a small temporary trench with a backhoe and burying a wood pole into the trench with steel slings attached to the pole to hold the wire until it can be sleeved and released into the air. Once complete, the pole will be removed. Another method is installing a screw type anchor in the ground and then unscrew the shaft of the anchor when sleeving is complete. Lastly, another method is use of two (2) Caterpillar D9 bulldozers with winches to hold back the wire to facilitate stringing operations. Once the stringing site is no longer being used, it will be returned to pre-construction conditions. 			
13	Data Request #1, Item	Provide additional details on the amount of cut-and- fill required for the Project.	Revised cut and fill estimat	tes are as follows	s: Fill	Net
	13	Provide the amount of estimated cut-and-fill in cubic yards for each of the following project areas:	Structures (including retaining walls) ¹	15,200 cu	11,200 cu	4,000 cu
		• Structure work areas	Foundations	Per the PEA (and based upo	on preliminary
		Retaining walls				on for concrete
		Concrete foundations		pier foundatio		
		Underground duct trenching		approximately Exact foundat		h size cannot be
		Staging yards		known until th		
				which require		

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		• Other areas requiring cut and fill The total estimated cut-and-fill does not appear to account for the retaining walls and amount of grading proposed at each structure. Please show the math on how this volume was calculated.	UG duct trenching ¹		ons with the to not procee s until furthe	CPUC, SDG&E ed with Geotechnical er direction is
			(excavation)	16,200 cu	0	16,200 cu
			Stringing Sites			5,000 – 10,000 cu
			¹ Note that the estimated cut have been updated since sub			underground trenching
			Underground excavation a Average trench de Standard trench w Flat trench width 230 kV Manhole 138 kV trench len Same trench dime 138 kV Manhole depth	epth - 7 feet vidth 3.2 feet (98 8.8 feet wide, 6 with over EX 30 gth: 1000 feet ensions as 230 k	feet deep (29) feet x 15 fe V	%)
14	N/A	Describe the potential design for the retaining wall face and provide a representative photograph of a retaining wall using this design and construction method.	Submitted with Response	No. 2 on10-31-1	14.	
15	N/A	Provide additional information about proposed underground work in Segment B.	See Attachment DR2 – Q1 permanent work area limit			
		Provide the following information related to underground work in Segment B:GIS data for the limits of the duct and splice vault	 Preparation of the Segmen Staking/marking wi both centerline and 	th nails and mar	k out paint t	he trench alignment,

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		 temporary work areas. Preparation required for the Segment B underground work area. Number and location of trees that would be removed within the underground work area. Impacts to irrigation lines and SDG&E's approach to repairing damaged irrigation lines. Methods that would be used to install the power line under the bridge on Carmel Valley Road. Would access be required under the bridge? If so, where is the access route and what equipment would be used beneath the bridge? 	 beginning and end of each horizontal sweep (curve) with respective stationing. Have all BMP's required by the SWPPP document put in place, sand bag storm drains etc. Review all permits and ensure availability on site. Notify Dig Alert for mark out. Conduct Preconstruction meeting including safety precautions Conduct Areconstruction meeting including safety precautions Conduct Areconstruction meeting including safety precautions Conduct safety tailgate each work day prior to work. Pot hole all utilities along the alignment once marked. Coordinate delivery of materials Set up traffic control The alignment was carefully engineered to eliminate the need for tree removal. No trees are required to be removed based on the current design. All known irrigation lines are indicated on the plan and profile drawings. There is little to no impact of the irrigation system based on the current plans. The preferred approach is to high line the irrigation system leaving it intact. If unmarked irrigation is encountered requiring rerouting, repairs will be made or an equivalent system will be installed for the section affected and will be approved by City inspector. The Carmel Valley Bridge is a box girder, closed cell construction bridge. To extend the 230kV underground system across the bridge on Carmel Valley Road, the conduit and cable system will go through a vacant cell inside the bridge. Bridge engineers have designed the system to bring the ducts from the road through the abutments and the cell. Access through the abutment will require a bore and 36" steel casing to penetrate the abutment at each end of the bridge. Two to four small access ports will be cut into the bridge deck on the eastbound lane for access to the bridge cell. Delineation and/or K rails will be placed inside the cell at five foot intervals. The conduits will be placed inside the cell at five foot intervals. The conduits will be

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			spacers inside the bridge and then out the casing at the other end of the bridge. Once in place, the conduits will be secured to the saddles and spacers and intercepted by the conduit system in the road.
16	N/A	Describe any modifications that SDG&E proposes to existing access roads to prevent erosion and channeling.	Submitted with Response No. 2 on10-31-14.
		Does SDG&E propose improvements to any of the existing access roads to prevent future erosion? If so, please define these improvements.	
17	N/A	Identify the landfill(s) that would be used for material disposal including removed vegetation, removed poles, and spoils. Provide the estimated hauling distance to the landfill.	Submitted with Response No. 2 on10-31-14.
18	N/A	Identify the locations of overland access routes and describe the activities to be performed within overland routes.	Submitted in Partial Response 1 dated 10/24/14
		No overland access routes are defined in the GIS; however, the Project Description in the PEA discusses the use of overland access. Please define where these overland access routes will be located, their dimensions, and the activities (e.g., vegetation removal) that would be conducted within the overland access routes.	
19	Data Request #1, Item 6	Prepare an Access Road Plan to include revised access road GIS data. Additional information is needed regarding project access roads and proposed road work. This information is needed to address agency concerns about impacts to vernal pools and habitats.	 The access road GIS data has been updated to include increased roadway classifications. Access point data has been provided. Construction crews would utilize access road forks and existing large bare ground areas (see Question 66 for an example). These areas could be used to complete passing and provide areas for vehicle turnarounds.
		1. Updated GIS data: Update the GIS to include access roads to each workspace and each work pad (existing or proposed), including all temporary overland routes and spur roads. Access routes on public paved roads are not needed. Access routes on private paved surfaces (roads	Access roads are typically maintained in accordance with SDG&E's NCCP. However, during construction, it may be necessary for construction vehicles to pass each other in certain instances. Passing locations would be sited within existing roadway forks (locations where multiple roads intersect

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		 and parking lots) need to be included with the GIS data. The linear access road data need to include accurate classifications for the following attribute designations for each road segment: a. Status: Existing or proposed, and if proposed, temporary or permanent b. Existing surface type: Paved, graveled, unpaved/dirt, or overland/vegetated c. Proposed road work: grading, vegetation removal (surface and tree clearance), or no work proposed d. Ownership: SDG&E-owned, private, public, or parks/preserve- managed, including the applicable owner or management entity that would be consulted prior to any proposed road work 2. Key access points (point data): Identify key access points (i.e., ingress/egress) to all access roads and staging yards, where traffic control or unloading and loading areas may be needed (e.g., where tracked equipment or materials would be unloaded and loaded onto larger trucks). 3. Additional access workspace needs (polygon data). Identify any additional access workspace that would be needed for construction such as unloading and loading areas, passing, parking, turnaround areas, and laydown areas. 	creating large bareground areas), proposed work pads, stringing sites, and turn-around areas, as practicable. To accommodate passing vehicles outside of previously identified work areas or access roads, SDG&E estimates that approximately 30 passing locations (outside of those areas noted above) may occur during project construction. Passing areas would involve overland travel (no grading or other improvement), directly adjacent an existing access road, of approximately 15 feet by 30 feet (450 sq. ft. per location, 13,500 sq. ft. total). Passing would primarily occur in disturbed, ornamental, or non-native grassland areas and would be a minor temporary impact and is likely to recover on its own. However, temporary impacts from these passing locations that do not recover would be quantified in a post- construction report and mitigated for as required by the SDG&E NCCP.
20	Section 3.4.8, page 3-42	Define the activities that would be conducted by helicopter and the duration of helicopter use (hours per day and total number of days).	At this stage of the project, SDG&E has not selected a construction contractor and therefore, can only make assumptions on construction means and methods for this response.
		The PEA states that helicopters may be used for stringing, installing or removing structures, and transporting equipment	The majority of helicopter operations will be completed during wire stringing operations and transporting of equipment or personnel. There are

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		and personnel. Additional details are needed to analyze the air quality, greenhouse gas emission, and noise emissions from helicopter use. Please provide the locations where helicopters may be used for installing and removing structures and the duration of helicopter use at these locations. Identify the maximum duration of helicopter use in a single location during stringing and equipment and personnel transport. Provide the total duration of helicopter use during the Project and the proposed hours for helicopter use during the day.	 typically ten (10) trips per structure at five (5) to ten (10) minutes each time. This would include fly time to the structure and back to the staging yard near the section of the project being constructed. While stringing a sock line with a helicopter, the length of time the helicopter is in the air is all dependent on the length of the line and the pulling section that the contractor has established. Typically this process is approximately fifteen (15) to thirty (30) minutes per phase of the circuit and the same amount of time for a shield wire or optical ground wire. While not anticipated, if a helicopter is used for installation or removal of a structure, it is approximately eight (8) to ten (10) minutes per structure with two (2) to three (3) trips each. These activities could take place on Segment A and/or Segment D. On an average day a helicopter could typically fly on a 10-hour day work schedule, but only have approximately six (6) to eight (8) hours of fly time each day.
21	Deficie ncy Report, Item #7	Specify the maximum trench dimensions for the underground trench on Carmel Valley Road. SDG&E provided minimum trench dimensions, but has not specified the maximum trench width. SDG&E reduced the workspace from 30 feet to 16 feet in the response to Data Request #1. The reduced workspace would only be feasible if the maximum trench width is the same as the minimum trench width.	The trench width will be predominantly 3.2 to 3.5 feet. There are four sections on the current design requiring a "flat" trench configuration, which is approximately 8.8 feet wide. These sections are approximately 80 feet long each, or 320 feet total representing approximately 2 percent of total trench length. For these small sections, an additional 6 feet of width will be required for construction.
22	Data Request #1, Item 63	Define the location(s) where SDG&E would obtain water for construction and the estimated travel distance to the Project. Would reclaimed water be used for dust control?	SDG&E proposes to use both potable and reclaimed water during construction. As stated in the attached letter from the City of San Diego Public Utilities Department (PUD) (Attachment DR2 – Q22), the PUD has confirmed that approximately 25 million gallons of potable and reclaimed water would be available for use during construction which is currently scheduled to begin in June 2016. Reclaimed water would be provided from

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			the City of San Diego's North City Water Reclamation Plant (NCWRP) located near Interstate 805 and Eastgate Mall, approximately 2.7 miles south of SDG&E's Penasquitos Substation. Reclaimed water produced at the NCWRP is distributed throughout the northern region of San Diego via an extensive reclaimed water pipeline distribution system. More than 79 miles of distribution pipelines are installed in Mira Mesa, Miramar Ranch North, Scripps Ranch, University City, Torrey Pines, Santa Luz and Black Mountain Ranch to provide reclaimed water to customers for irrigation, landscaping and industrial use. NCWRP also provides reclaimed water for the City of Poway. Reclaimed water to be used during construction would be obtained from City's distribution pipelines or stored in water towers at project staging yards to minimize the distance travelled by water trucks to specific work locations. Potable water used during construction would be obtained either from fire hydrants located near the transmission corridor or from water towers at staging yards. The specific locations where SDG&E would obtain water for construction are not known at this time. SDG&E is working with the City of San Diego to identify appropriate locations that would take into account the minimization of travel distance.
23	N/A	Clarify the area that is required for permanent maintenance pads. One part of the PEA states there would be a 50-foot by 75-foot area (3,750 square feet) for permanent maintenance needs, whereas another says that approximately 700 square feet would be needed. These are very different values. Specify which value is correct or why they are different.	Submitted with Response No. 2 on 10-31-14.
24	EMF Manage ment Plan	Provide existing EMF data at the edge of the right-of-way by transmission line segment (e.g., Segment A West).SDG&E's EMF Management Plan only includes data for the Proposed Project condition and does not provide the existing EMF or change in EMF.	Submitted in Partial Response 1 dated 10/24/14.
25	GIS	Provide GIS attribute data that specify the type of	Attribute data for structures has been added to the GIS data.

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		structure type (e.g., pole type, tower, or H-frame) consistent with the detailed route maps in the PEA (e.g. 138-kV, 230-kV, or 69-kV poles) for all existing and proposed structures in the Project corridor.	
		The maps prepared for the PEA include specific pole types at each pole location. The GIS data provided to the CPUC lack the attribute data required to define the pole types at each location.	
26	Data Request #1, Item 62	Provide GIS data for the revised guard structure locations at SR 56 and ensure that there are sufficient access routes to each structure along the alignment.	Updated GIS for all anticipated guard structures has been provided.
	02	SDG&E's response to Data Request #1 generally describes the locations of two guard structures at SR 56; however, CPUC was never provided the GIS showing the locations of these guard structures.	
27	GIS	Provide revised permanent and temporary workspaces for retaining walls.	Revised GIS data has been provided.
		Retaining walls located adjacent to P2 and P53 fall outside permeant and temporary work areas. Update the GIS data for the permanent work areas to include the footprint of the retaining wall. The retaining wall will be a permanent structure and the permanent workspace areas and calculations need to be revised to reflect the area of permanent impact for these retaining walls. The temporary workspace needs to also be revised to include adequate construction access for construction of the retaining walls.	
28	GIS	Clarify if direct access connections from the work areas to the Stonebridge Staging Yard would be needed.	Submitted in Partial Response 1 dated 10/24/14.
		There are currently no proposed direct access roads to and from the work areas at P2, P3, or P4. If direct access	

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		connections are necessary, provide the revised access route data.	
29	GIS	A-1: Clarify if the work area northwest of P4 would be used during access.The work area is located immediately west of the existing structure. If the work area is needed, include the area in the revised GIS data.	Yes, this area would likely be used during construction. The temporary work space for Structure P4 has been updated within the GIS included as part of the response to Data Request No. 2. During construction, construction crews and support staff (e.g. monitors) may utilize existing access roads and work pads within and immediately adjacent to the Project facilities. This would include existing disturbed areas that include but are not limited to where multiple roads intersect, where existing structure work (operation and maintenance) pads intersect with existing access and spur roads or areas adjacent to access roads.
30	GIS	A-2: Confirm the ingress/egress route for Stonebridge Staging Yard. Provide the revised access route data.	Access to the Stonebridge Staging yard would be from Stonebridge Parkway via the existing concrete driveway. The GIS data has been updated.
31	GIS	A-3: Identify the purpose of the four dead-end road segments north of P3 and R2.	These roads may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
32	GIS	A-4: Provide revised permanent and temporary workspaces for retaining walls. Retaining walls located adjacent to P2 and P53 fall outside permanent and temporary work areas. Update the GIS data for the permanent work areas to include the footprint of the retaining wall. The retaining wall will be a permanent structure and the permanent workspace areas and calculations need to be revised to reflect the area of permanent impact for these retaining walls. The temporary workspace needs to also be revised to include adequate construction access for construction of the retaining walls.	The GIS data has been updated to reflect the requested changes.
33	GIS	A-5: Confirm that GS4 has been removed. The access route to GS4 previously included with the GIS	The guard structure in question will be needed. The access to the guard structure in questions has been added to the access road GIS layer.

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		data was not included with the most recent access roads data. If GS4 has not been removed, revise the access route data to include the access route to GS4.	
34	GIS	A-6: Clarify if the access route between P10 and P11 would be used or needed during construction.	The access road in question will be needed and has been added to the GIS data.
		If the access route is needed, include the access route in the revised GIS data.	
35	GIS	A-7: Some access road segments, including the one south along the alignment from P10, extend past public road ending points. Verify that road segments end appropriately in the revised GIS data.	The requested change has been completed and the revised Access Roads GIS attached reflects this change.
36	GIS	A-8: Clarify whether or not GS9 is still needed.	The guard structure in question will be needed. The access to the guard
		The access route to GS9 previously included with the GIS data was not included with the most recent access roads data. If GS9 is deemed necessary, revise the access route data to include the access route to GS9.	structure in questions has been added to the access road GIS layer.
37	GIS	A-9: Clarify if the work area immediately northwest of P14 would be used during construction.	Yes, this area would likely be used during construction. The temporary work space for Structure P4 has been updated within the GIS included as part of the research to Date Deswert No. 2
		The work area surrounds the existing structure northwest of P14. If the work area is needed, include the area in the revised GIS data.	the response to Data Request No. 2.
38	GIS	A-10: Clarify if a spur road would be constructed to P17.	Yes, a new spur road would be constructed and used for access to Structure P17. The road has been added to the GIS data.
		If the road would be constructed, include the road in the revised GIS data.	P17. The road has been added to the GIS data.
39	GIS	A-11: Identify the purpose of the two road segments along existing paths west and south of P15.	These roads may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
40	GIS	A-12: Identify the purpose of the road segment east of P18.	These roads may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.

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41	GIS	A-13: Clarify if access between R23 and R24 would also occur through the private parking lot.	Yes, access may occur through the parking lot as well. The access road GIS had been updated to reflect this change.
		The current access road between R23 and R24 follows a path adjacent to the private parking lot. If access through the parking lot is necessary, include the route in the revised GIS data.	
42	GIS	A-14: Clarify if the area along the access road south of P24 would be used during construction.	Yes, the road segment in question could be used for turnaround of construction vehicles. The GIS data has been updated accordingly.
		The area is a small cleared area on the eastern side of the access road just before the road ends. If the area is needed, include the area in the revised GIS data.	
43	GIS	A-15: Clarify if the cleared area east of P25 would be used during construction.	Yes, the cleared area east of P25 would be needed for construction, particularly for turnaround of construction vehicles and equipment. The GIS
		The area is immediately east of the existing structure east of P25. If the area is needed, include the area in the revised GIS data.	has been updated accordingly.
44	GIS	A-16: Identify the access route connection between GS28 and GS29.	SDG&E's legal access to the existing structures adjacent to P26 is through the private parking lot in question (located between mapped GS28 and GS29). The access is now shown within the GIS data.
		Include the access route in the revised GIS data.	
45	GIS	A-17: Clarify if the access road east of P26 would be needed or used during construction.	No access would be needed east of P26. There is not a road from P26 to the asphalt road to the east.
		There is a cleared path leading east from P26 that connects to a cul-de-sac. The road is a potential access route to the work area surrounding P26. If the access route is needed, include the route in the revised GIS data.	
46	GIS	A-18: Identify access routes to the two work areas surrounding R31, R32, P30, P31, GS31, and R33.	These work areas will be accessed via private entrance from Azuaga Street and through the private parking lot heading east to all referenced areas. The CIS data has been undeted
		No access routes are currently identified to either of the work areas. Include the access routes in the revised GIS data.	GIS data has been updated.

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47	GIS	A-19: Provide the access route to the Chicarita Substation.	Access to the Chicarita Substation has been added to the GIS data.
		The access route to the Chicarita Substation needs to be identified similar to how access was identified to the Peñasquitos Substation. Revise the GIS data to include the route.	
48	GIS	A-20: Clarify if alternate access would be needed to the Chicarita South Staging Yard from the east.	No, access to the Chicarita South Staging Yard is anticipated to occur from the south and west via existing SDG&E access roads.
		If access from the east is needed, revise the GIS data to include the access route.	
49	GIS	A-21: Identify the ingress/egress route(s) for the Chicarita South Staging Yard.	Access to the Chicarita South Staging Yard is anticipated to occur from the south and west via existing SDG&E access roads. This access is shown on
		Include the access route(s) in the revised GIS data.	the updated GIS data.
50	GIS	A-22: Identify the purpose of the road segment west of R37.	This road segment is located within the potential temporary structure work area. In addition, it may be used by construction and support crews for parking, temporary laydown, vehicle passing, and turnaround areas.
51	GIS	A-23: Clarify if the area southeast of P34 would be used during construction.	Yes, the area in question could be used during construction of the Project. The GIS data has been updated accordingly.
		The area is a cleared area southeast of P34, situated between P34 and an existing structure. If the area would be used, include the area in the revised GIS data.	
52	GIS	A-24: Identify the purpose of the road segment southeast of R43 that runs east to west.	This road may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
53	GIS	A-25: Identify the purpose of the road segment east of P36 that runs north to south.	This road may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
54	GIS	A-26: Remove the additional road segment at the end of the access route southwest of P36.	The requested change has been completed and the revised Access Roads GIS attached reflects this change.
		The west end of the access road extends a short distance into	

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		public road. Revise the GIS data to remove the extra distance.	
55	GIS	A-27: Clarify if the road shoulder areas south of P36 would be used during construction to park, pass, or stage.	Yes, the road shoulder areas in question could be used during construction for activities such as vehicle passing or parking. During construction, construction crews and support staff (e.g. monitors) may utilize existing access roads and work pads within and immediately adjacent to the Project facilities. This would include existing disturbed areas that include but are not limited to where multiple roads intersect, where existing structure work (operation and maintenance) pads intersect with existing access and spur roads or areas adjacent to access roads.
56	GIS	A-28: Remove the additional road segment at the end of the access route east of R40.	The requested change has been completed and the revised Access Roads GIS attached reflect this change.
		The east end of the access road extends a short distance into public road. Revise the GIS data to remove the extra distance.	
57	GIS	A-29: For clarity, connect the two access roads east of R44 if they intersect.	The referenced access roads do not intersect. No revision to GIS data is required.
		One access road runs north to south, and the other road forms a bend. Revise the GIS data if the roads intersect.	
58	GIS	A-30: These access roads surrounding R47 and P41 appear to be inaccurate. Verify and revise these roads accordingly.	The requested change has been completed and the revised Access Roads GIS attached reflect this change.
59	GIS	A-31: The workspace and pad south of GS16 were included with the GIS data provided. It is assumed that the inclusion of these areas is a data error, and neither would be part of the proposed project. Confirm that these are errors and should not be included, or provide an explanation for their purpose. If they are errors, remove these objects from future data provided.	It is confirmed that this area is no longer needed. This was the original alternative for the underground to overhead cable pole location, which is no longer an option. The GIS data has been revised to reflect this change.
60	GIS	B-1: Identify the ingress/egress route(s) for the Camino Del Sur Staging Yard.	Ingress/egress will be via Camino Del Sur Road. Ingress/egress points have been added to the GIS data.

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		Include the access route(s) in the revised GIS data.	
61	GIS	B-2: Clarify if access under the bridge east of V8 would be needed. Previous roads data included this access route.	Access under the bridge is not anticipated to be needed for construction or operation of the Project.
62	GIS	B-3: The structure temporary workspace north of R48 appears to be incorrect. Clarify or remove the workspace from future data. Would this stringing area and access route be needed, or is this a data error?	The wire stringing site and access route would be required for construction and has been shifted to the south. Additionally, a new guard structure location has been located in the center of Carmel Valley Road for protection during stringing activities. Please see revised GIS data that reflects this change. Regarding the temporary workspace north of R48, this is no longer needed as it was initially the alternate underground to overhead cable pole location.
63	GIS	C-1: Identify the ingress/egress route(s) for the SR-56 Staging Yard.	The location for the SR-56 staging yard has been relocated and this question is therefore no longer applicable.
		Include the access route(s) in the revised GIS data.	
64	GIS	C-2: Identify the drainage features that appear to intersect with the SR-56 Staging Yard. Explain whether or not they could affect use of the area as a staging yard.	Submitted in Partial Response 1 dated 10/24/14.
65	GIS	C-3: Identify the drainage feature along the access road west of Torrey Santa Fe Road and if it could affect access.	The existing drainage feature is not anticipated to adversely affect project access as there is an existing SDG&E access road through the area in question. In addition, the access point through the drainage is not strictly needed as access points exist to the north and south of the drainage crossing point.
66	GIS	C-4: Clarify if the area along the access road west of Torrey Santa Fe Road would be used during construction. The area is a cleared area at the junction of two access roads. If the area would be used, include the area in the revised GIS data.	Yes, the area in question would be used during construction. During construction, construction crews and support staff (e.g. monitors) may utilize existing access roads and work pads within and immediately adjacent to the Project facilities. This would include areas that provide for extra existing disturbed space such areas where multiple roads intersect, and where existing structure work (operation and maintenance) pads intersect with existing access and spur roads.
67	GIS	C-5: Identify the purpose of the road segments north of	These road segments may be used by construction and support crews for

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		the western cul-de- sac of Torrey Santa Fe Road.	activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
68	GIS	C-6: Remove the additional road segment at the end of the access route that leads into the western cul-de-sac of Santa Fe Canyon Place.	The GIS data has been revised accordingly.
		The east end of the access road extends a short distance into public road. Revise the GIS data to remove the extra distance.	
69	GIS	D-1: Identify the purpose of the road segment that leads south from P44.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
70	GIS	D-2: Additional development not shown in the current aerial photo has occurred. Verify that the road segment that extends into the development area north of P49 would still be used.	The GIS data has been revised accordingly.
		The road segment extends into a small outcrop of the development area.	
71	GIS	D-3: Identify the purpose of the road segment south of P49. Clarify if the area along the road segment would be used during construction.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
		The area is a cleared area immediately south of the current work area. If the area would be used, include the area in the revised GIS data.	
72	GIS	D-4: Identify the purpose of the road segment that leads southeast from P50.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
73	GIS	D-5: Identify the purpose of the road segment south of P53.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
74	GIS	D-6: Identify the purpose of the road segment south of R62.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle

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			passing, and turnaround areas.
75	GIS	D-7: Revise the access route segment north of P55 so that it connects to public road.	The GIS data has been revised accordingly.
		Include the access route in the revised GIS data.	
76	GIS	D-8: Identify the purpose of the road segment north of R68. Additional development not shown in the current aerial photo would not allow access from the north.	This road segment may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
77	GIS	D-9: Identify the purpose of the two road segments that intersect southwest of P57 and south of P56.	These road segments may be used by construction and support crews for activities including but not limited to: parking, temporary laydown, vehicle passing, and turnaround areas.
78	GIS	D-10: Identify the purpose of the extra road segment north of the Peñasquitos Substation. Would extra workspace be needed between the stringing sites?	The road segment in question has been removed from the GIS data.
79	GIS	D-11: Revise the three access routes that allow access to the western side of the Peñasquitos Substation. The access routes should extend to the edge of the substation.	The requested change has been completed and the revised Access Roads GIS attached reflect this change.
		Include the access route in the revised GIS data.	
80	GIS	D-12: Identify the purpose of the road segment that extends south from the access road to the Peñasquitos Substation.	The road segment has been removed and the GIS data revised accordingly.
81	GIS	D-13: Revise the eastern end of the access route to the Peñasquitos Substation so that it extends to public road.	The requested change has been completed and the revised Access Roads GIS attached reflect this change.
		Include the access route in the revised GIS data.	
82	GIS	Overview-1.1: Several project access roads do not fully connect to public roads. Ensure that all access roads connect to public paved roads, so any road calculations will be accurate.	Access road GIS data has been updated (attached) to ensure that all project access roads extend to the first public paved road, as appropriate.
		Include the access routes in the revised GIS data.	

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83	GIS	Overview-1.2: Several project access roads are called out for grading, but appear to be heavily graveled or are paved, and some roads are not classified at all. Please evaluate and provided updated road classifications.	Access road GIS data attributes have been updated. Any SDG&E owned and maintained unpaved access road could be refreshed (re-graded as needed). Refer to the response to Question #16 for additional information.
84	GIS	Overview-2: The long access route west of Segment A (near P20 through P23) does not connect to any work areas. State the purpose for this access road.	Submitted with Response No. 2 on 10-31-14.
85	GIS	Overview-4: Identify the ingress/egress route(s) for the SR- 56 Staging Yard. Include the access route(s) in the revised GIS data.	Submitted with Response No. 2 on 10-31-14.
86	GIS	Overview-5: The access road that leads south from P44 into the Los Peñasquitos Canyon Preserve dos not connect with another access road that runs east to west through the preserve. State the purpose of these access roads.	The existing SDG&E access road that leads south from Proposed Project Structure P44 is not needed to construct or maintain the Proposed Project south of the Structure P44 work area. The access road GIS layer has been updated accordingly.
87	N/A	Provide the location of any proposed tangent structures (larger TSPs) that would be used along any of the proposed overhead alignments.	Structure designations have been added to the revised GIS data. All structures are designated as proposed for the Project.
		There is an in-line dead-end (anchor) tower structure just north of the first SR 56 crossing (Segment A). These tower types are approximately twice the diameter of tangent towers, which makes them more visually apparent. Please submit the locations (GIS data) and pole number if large-diameter TSPs are proposed.	
88	Defic iency Repo rt #1, Item 15	Clarify the location of proposed marker balls within Segment D. From our current GIS data set, Segment D east of tower structure E24 shows several spans with marker balls. Will the marker balls be on the shield (guard) wires of the new monopole or the higher shield wires of the existing steel lattice towers?	Submitted in Partial Response 1 dated 10/24/14.

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89	Data Request #1, Item 21	Please provide a CD of the baseline photos and simulations included in the PEA. The CPUC requested a CD of the baseline photos and simulation in Data Request #1, Item 21. The response said a CD would be shipped; however, it was never received.	Submitted in Partial Response 1 dated 10/24/14.
90	N/A	There is a large cable strung on the H-frame between the poles just south of Poway Road to the Scripps Summit Business Park (refer to Attachment 4). Its line's catenary is well below the conductor's catenary. What does SDG&E plan to do with this line when the H-frames are removed? Will the line be removed?	Submitted in Partial Response 1 dated 10/24/14.
91	Air Quality Model	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. There have been changes to the project staging yards and Project Description, including construction of large retaining walls, that could affect the assumptions used in the air quality model. The air quality modeling needs to be updated to reflect the current Project Description that accounts for locations of proposed staging yards (with property owner permission) and responses to items in this data request that include, but are not limited to, the total amount of cut-and-fill (import and export of material), locations of landfills, locations of water sources, and duration and type of use of helicopters.	The air quality calculations assumed that each truck would travel approximately 31 miles per day to account for travel to the construction site, and other trips such as travel to the landfill, travel at the site, etc. This represents a conservative estimate of travel distances. However, to take into account the CPUC's concern, the travel distance has been increased by 4.7 miles for all truck trips to approximately 35.7 miles. 4.7 miles is the assumed greatest distance from any staging yard to the project construction area (on Segment D). The analysis therefore continues to represent a conservative estimate of emissions.
92	Air Quality Model	 Provide vehicle exhaust emissions factors for on-road trucks. Provide all vehicle exhaust emission factors used for the air quality modeling. Specifically, this should include emissions factors for: On-road trucks at 30 miles per hour 	 EMFAC2011 output files have been provided for all vehicles as requested (Attachments DR2 – Q92): On-road trucks at 30 mph On-road trucks PM10 tire wear and brake wear On-road trucks PM2.5 tire wear and brake wear Gasoline-powered light-duty vehicles at 35 miles per hour

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		 On-road trucks PM10 tire wear and break wear On-road trucks PM2.5 tire wear and break wear Gasoline-powered light-duty vehicles at 35 miles per hour emissions factor Any other vehicle exhaust 	• ROG evaporative emissions from light-duty vehicles Minor corrections have been made as discussed in the response to Comment 93 below.
93	Air Quality Model	 Confirm the use and model/classifications of construction equipment for each segment. The construction trucks or vehicle models identified for a segment's maximum daily construction emissions, construction heavy equipment use (Table A-1) does not match the construction truck or vehicle models identified in the segment's maximum daily construction emissions, construction trucks (Table A-2). For example, a crane truck is identified as MHDT idling in Table A-1, but is identified as LHDT in Table A-2. Please clarify or correct these discrepancies in the air quality model. 	 Use and model/classifications have been confirmed. The following corrections were made to the calculations: Worker vehicle emissions had been based on light-duty autos for running exhaust. For conservative purposes, emission factors for light-duty trucks have been used. Concrete trucks have been classified as light-heavy duty vehicles. PM10 and PM2.5 for tire wear and brake wear for heavy-duty vehicles have been corrected. With regard to idling emission factors, the EMFAC2011 model <u>only</u> provides idling emissions for MHDT and HHDT vehicles. It does not provide idling emissions for light-heavy duty vehicles to support construction activities, the idling emission factors for MHDT vehicles have been used in the construction equipment calculations.
94	Air Quality Model	Update the PM10 and PM2.5 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). The EPA has updated AP-42 to include new emissions factors for on-road vehicles and trucks. Revise the paved- road emissions factors to reflect this update.	The calculations have been updated based on the 2011 edition of Section 13.2 of AP-42 (see attached).
95	Air Quality Model	Update the materials handling fugitive dust emissions calculations using a consistent method for all segments. The materials handling fugitive dust emissions were not calculated consistently across all line segments. Use the same	The materials handling calculations were based on average wind speeds for some segments, and maximum wind speeds for others. To be consistent, while conservative, the maximum wind speed based on San Diego conditions was used to estimate fugitive dust emissions for all calculations.

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		methodology to calculate materials handling fugitive dust emissions across all segments and specify all input values, including the assumptions for constants that are used.	Calculations are consistent between segments (refer to attached updates emission estimates).
96	Air Quality Model	Clarify whether the emission for Greenhouse Gases in Table B-1 and Table B- 2 are the total for both construction years 2016 and 2017, or if the emissions reflect a single year. If the emissions reflect a single year, do the emissions reflect a 12-month construction period in one year or do they assume construction would start mid- year?	The GHG emission calculations in Tables B-1 and B-2 (see attached tables) are based on the total hours of use of equipment and total truck trips for the duration of the construction activities and therefore represent the total for both construction years, 2016 and 2017.
97	Air Quality Model	Provide the maximum leak rate and emissions of SF6 for the project's transmission circuit breakers. The PEA states that the project would generate SF6 from the project's transmission circuit breakers. SDG&E's response to DR#1 states that a total of approximately 644 pounds of SF6 would be required during operation and maintenance of the project. Please clarify if this is the total amount required over the lifetime of the project's operation/maintenance or provide the timeframe associated with this amount. Please also prove the potential leak rate and emissions of SF6.	The circuit breakers for the Proposed Project have a total SF6 capacity of approximately 772 pounds. New circuit breakers, such as the circuit breakers for the Proposed Project, are typically certified by manufacturers to have a maximum SF6 leak rate of 0.5 percent relative to their nameplate capacity. This maximum SF6 leak rate is extremely low and will not cause any significant losses of SF6 or require replenishment of SF6 in the circuit breakers over the life of the Proposed Project. SDG&E calculates annual SF6 emission losses on a system-wide basis, as required by regulations adopted by the California Air Resources Board (ARB) and U.S. Environmental Protection Agency. The calculation is a mass balance approach on a system-wide level that aggregates annual SF6 purchases, disbursements, leaks, amounts sent for recycling, etc. The mass balance approach includes a mix of old and new circuit breakers in a variety of capacities and conditions. Therefore, accurately calculating the SF6 losses from the circuit breakers for the Proposed Project 's operational life would be impractical. ARB's SF6 regulations require that the leak rate from SDG&E's entire system not exceed 1 percent relative to the system's total nameplate capacity by 2020. SDG&E's system-wide leak rate already complies with the 1 percent requirement for 2020.
98	Air	Provide annual air quality emissions calculations for criteria	While the SDAPCD does not comment or provide guidance on CEQA

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	Quality Model	pollutants. The PEA only includes daily emissions. SDAPCD has annual emissions thresholds. Please provide annual emissions estimates.	projects, other lead agencies use daily emission thresholds to evaluate significance for construction projects. For example, the SCAQMD has adopted daily thresholds for both construction and operation. However, to address the CPUC's request, additional tables have been added that calculate annual emissions.
99	Air Quality Model	Address the errors in Table B-1 including the cells for CO2 total emissions (cell W36), CH4 total emissions (cell X36), and N2O total emissions (cell Y36).	The table has been corrected, and Table B-5 has also been corrected.
		The formulas in these cells are incorrect and affect the total GHG emissions from construction equipment use. The incorrect GHG emissions from construction equipment use are also carried over into Table B-5. Correct these errors.	
100	PEA page 4.3-16, Table 4.3-5	Provide 2013 air quality data for PM2.5, PM10, NO2, SO2, and CO. Clarify the air quality station that was used to obtain data on CO and SO2.	The table has been updated with 2013 data, which were not available when the analysis and section were written.
101	N/A	Provide the estimated GHG emissions from the Proposed Project without mitigation. The CPUC PEA Checklist requires (1) quantifying GHG emissions associated with a Proposed Project if no mitigations are used and (2) quantifying the net GHG emissions after mitigations have been applied. The PEA only presents GHG emissions after mitigation.	The quantifiable mitigation measures that have been identified by SDG&E for project construction only affect fugitive dust. Accordingly, they do not have any effect on GHG emissions, and therefore unmitigated and mitigated GHG emissions would be the same. No table is therefore warranted.
102	N/A	Complete biological surveys in all areas of the Proposed Project that have not been surveyed for biological resources. SDG&E has proposed use of many miles of access roads, stringing sites, other work areas, and staging yards that have not been surveyed for biological resources. The areas requiring biological surveys are shown on the Biological Survey Maps	Refer to Attachment DR2 – Q102.

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103	PEA Appendi x 4.4- A Page 58 and Append ix F	 included in Attachment 5. The overview maps show all project areas requiring survey including the long access roads that remain in the GIS dataset. The detailed maps only show a close up of the areas that require survey along the project corridor. SDG&E must complete surveys for all remaining work areas including access roads, staging yards, and stringing sites that are proposed for Project use. The survey data are required to establish baseline biological resource conditions along proposed roadways and work areas. These data are necessary to analyze the existing conditions and environmental impacts under CEQA; therefore, the CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies, in which case the CPUC will conduct the studies. Otherwise, inform us as to when this information will be provided. Provide GIS data for Quino checkerspot butterfly (QCB, <i>Euphydryas editha quino</i>) localities and Mapped Areas. The PEA states, "The QCB has a moderate potential to occur within the BSA. Host plants and suitable habitat is present within the BSA and known localities exist just outside of the SDG&E Quino Mapped Area." Provide GIS data that identify where QCB localities occur "just outside the BSA" (or any within the BSA). Please also provide the most current data for the QCB Mapped Area in the BSA. According to SDG&E's QCB Low-Effect HCP, the USFWS will update the Mapped Areas annually and provide the information to SDG&E. Finally, provide a Project-specific habitat assessment for the QCB for the BSA regardless of whether or not it is within the previously mentioned "Mapped Areas." The assessment needs 	Submitted with Response No. 2 on 10-31-14.

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		to include GIS data and mapping of potential QCB habitat. USFWS will require protocol surveys for QCB in suitable habitat areas prior to construction.	
104	PEA Appendi x 4.4- A Page 65 and Append ix F	 Provide GIS data for the burrowing owl (BUOW, Athene cunicularia) habitat assessment. The PEA states, "The burrowing owl has a moderate potential to nest and winter within the BSA. The BSA is within the known range of this species but there is limited suitable habitat present." Provide GIS data that identify the locations of potential BUOW habitat in the BSA and an explanation as to how those locations were determined. In addition, CDFW has requested protocol surveys for BUOW. Protocol surveys will need to be conducted by SDG&E in the spring. The BUOW survey report needs to be provided to CPUC within 30 days of survey completion. 	Submitted with Response No. 2 on 10-31-14. Full results will be submitted in early 2015.
105	PEA Appendi x 4.4- A Appen dix A, Figure 6 Appen dix E, Table 3	 Provide a habitat assessment for thread-leaved brodiaea (Bf; Brodiaea filifolia). The PEA indicates that the BSA is outside of the known range of Bf. Several occurrences of Bf were shown on Figure 6 of Appendix A, however, and the June 27, 2014, Special-Status Plant Survey Summary Report for the Project (prepared by Busby and Rocks) documents Bf in the BSA in close proximity to the alignment (page 11 of Figure 3). A habitat assessment for this species needs to be completed to identify areas where the species has potential to occur in the BSA, based on appropriate soils, vegetation communities, and any other habitat requirement for this species. Provide GIS data of the potential Bf habitat areas based on a field assessment and a write-up of how the habitat assessment was completed. 	Refer to Attachment DR2 – Q105.

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106	PEA Appendi x 4.4- A Appendix D	Provide a habitat assessment for willowy monardella (Mv; Monardella viminea). The PEA indicates that Mv has very low potential to occur; however, the CNDDB shows locations in drainages that extend into a 1-mile buffer around the alignment. A habitat assessment for this species needs to be completed	Refer to Attachment DR2 – Q106.
	Appen dix E, Table 2	to identify areas where the species has potential to occur in the BSA based on appropriate habitat requirements for this species. Provide GIS data of the potential Mv habitat areas based on a field assessment and a write-up of how the habitat assessment was completed.	
107	PEA Appendi x 4.4- A; Appen dix A, Figure 6; Appen dix E, Table 2; Figure 12 (page 25)	Provide explanation for "very low" potential for California Orcutt grass (Oc; Orcuttia californica). The PEA indicates that Oc has very low potential to occur and that vernal pool habitat is present, but the BSA is outside the known range of the species in San Diego County. However, the CNDDB shows a location for this species at the western end of the alignment, and a vernal pool is mapped at the western end of the alignment.	Submitted with Response No. 2 on10-31-14.
108	GIS	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". The delineation included locations of vernal pools and "potential road rut vernal pools" within project access roads	GIS data is attached (Attachment DR2 – Q108).

#	Ref	Question Description	SDGE Response
		and work areas. This data is needed to analyze potential impacts to vernal pools in the DEIR.	
109	N/A	Complete cultural resource surveys in all areas of the Proposed Project that have not been surveyed for cultural resources.	Refer to Attachment DR2 – Q109_Survey Report (CONFIDENTIAL).
		SDG&E has proposed use of many miles of access roads, stringing sites, other work areas, and staging yards that have not been surveyed for cultural resources. The areas requiring cultural resource surveys are shown on the Cultural Survey Maps included in Attachment 6. The overview maps include the long access as well as an overview of all areas that require surveys. The detail maps provide greater detail on the areas along the alignment that have been surveyed and that require cultural resource surveys. SDG&E must complete surveys for all remaining work areas that are proposed for Project use that were not previously surveyed. The survey data are required to evaluate the impacts to cultural resources under CEQA; therefore, the CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies, in which case the CPUC will conduct the studies. Otherwise, inform us as to when this information will be provided.	
110	Defic iency Repo rt #1, Item 26	Provide additional information on sites 370024244H, Cypress Creek Stagecoach Road, and 37-033557H, Old Highway 395. Specifically, define whether these roads would be used for Project access or occur within the work area. If these roads would be used for the Project, these resources need to be evaluated for California Register of Historic Resources (CRHR) eligibility and any existing SDG&E management or maintenance plans for these roads.	Project-related activities will not utilize either road segment nor will project- related activities occur within or adjacent to either site.

#	Ref	Question Description	SDGE Response
		In accordance with the outcome of the Madera Oversight Coalition v. County of Madera case, substantial evidence must be provided demonstrating that known sites that have not been evaluated for their eligibility can be avoided, or if they cannot be avoided, they must be evaluated for eligibility for listing in the CRHR so that the results can be included in the EIR analysis.	
		Sites 370024244H and 37-033557H appear to be within the Project work area, but have not been evaluated for CRHR eligibility. The PEA did not discuss impacts to these resources; however, it appears these roads may be used for Project access. If SDG&E intends to use these roads, SDG&E must evaluate the eligibility of the resources for listing in the CRHR. The CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies, in which case the CPUC will conduct the studies. Otherwise, inform us as to when this information will be provided.	
111	Defic iency Repo rt #1, Item 26	Evaluate CA-SDI-14131 for CRHR eligibility or specify measures that SDG&E will implement to ensure the resource is avoided. The PEA did not disclose any impacts to Site CA-SDI-14131; however, it appears this site is located in proximity to the Project work area and could be impacted by the Project. This site was not previously evaluated by SDG&E for CRHR eligibility. This resource must either be evaluated for CRHR eligibility or SDG&E must specify the measures that will be implemented to ensure the resource will be avoided by the Project. The CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies, in which case the CPUC will conduct the	The rationale for not evaluating CA-SDI-14,131 was included in the SX-PQ Testing Plan that was previously submitted to the CPUC. The testing plan stated that this prehistoric site was originally recorded in 1995 by Gallegos & Associates as a lithic scatter. During the current survey, the wooden stake and aluminum tag which originally marked the datum at the site were relocated. The stake was no longer embedded, however the location corresponds to the original site location, and has apparently not been displaced. The nearby proposed pole location is outside the recorded site boundary on an exposed ridge (non-depositional environment) with good ground visibility and no archaeological materials. This site will be an identified as an Environmentally Sensitve Area during construction to ensure avoidance of impacts and work at the adjacent pole will be monitored.

#	Ref	Question Description	SDGE Response
		studies. Otherwise, inform us as to when this information will be provided.	
112	Defic iency Repo rt #1, Item 26	 Provide a landscape-level assessment of potential Project impacts to: 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 If the project would impact these resources based on the landscape-level assessment, then these resources must be evaluated for CRHR eligibility. Sites CA-SDI-1148H, CA-SDI-11256H, and 37-033556H are landscape-level historic resources. These resources need to be evaluated in a landscape context to determine whether or not the Project would impact the resources. The PEA did not include a landscape-level assessment of the resources and dismissed any impacts to the resources without sufficient evidence. The CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want 	A landscape assessment applicability is in progress and is anticipated to be submitted in approximately one month. If necessary, a full evaluation would be conducted and results submitted in early 2015.
		to conduct these studies, in which case the CPUC will conduct the studies. Otherwise, inform us as to when this information will be provided.	
113	Section 4.10.3.3, page 4.10- 7	Provide additional noise measurements characterizing generalized noise environments where impacts may occur.	Response pending. The results will be submitted in approximately one month.
	1	The transmission line goes from very quiet locations to louder locations (near transportation noise). Completed noise surveys	

#	Ref	Question Description	SDGE Response
		focused on providing a quiet ambient characterization of noise without any daytime (during construction hours) measurements to provide an environmental characterization. No attempt was made to characterize existing corona noise levels or at least to show the corona noise level as less than typical ambient.	
		Additional daytime measurements are needed in several locations with traffic noise. These should be used with a normal traffic distribution pattern to provide a 24-hour typical noise level for the location. In addition, several simultaneous 24-hour existing power line coronal noise measurements taken with a recording meter are needed. The meter needs to be configured to take measurements every minute or every second, with meters set on the same time standard to show the coronal or other environmental noise floor for a given location. Furthermore, one meter needs to be placed directly below the existing power line and a second at approximately two doublings of the same distance away from the power to show the corona noise and the reduction of noise due to distance.	
		Reference locations are provided for the above measurements in Attachment 7. Provide a map showing the locations of previous noise measurements and these additional noise measurements with appropriate labels that are consistent with the noise measurement tables. The CPUC requires this information for the Draft EIR. Let us know by October 8 if you cannot or do not want to conduct these studies, in which case the CPUC will conduct the studies. Otherwise, inform us as to when this information will be provided.	
114	PEA Table 4.10-10 Section 4.10.4.3	Provide data for any grading and compaction equipment that would be used for reestablishing and maintaining access roads, and include a discussion in the noise impacts from use of this equipment.	 Reestablishing and maintaining access roads will be accomplished utilizing graders and excavators. Table 1 shows the sound levels to be expected for this equipment, adjusted for an 8-hour workday. Table 1: Access Road Maintenance Sound Levels Adjusted for 8-hour

#	Ref	Question Description	SDGE Response							
			Day							
			Adjusted Noise Level for 8-hour D							
			Equipment	50 feet	100 feet	200 feet	500 feet	1,000 feet		
			Grader	75	69	63	55	48		
			Excavator	77	71	65	57	50		
115	Data Request #1, Item 40 Section 4.10-3	Provide a description of the heavy lift helicopter noise that will be generated when tower sections are lifted, including a flight plan, which helicopters will be used for tower lifts, take-off noise, transition noise, level flight noise, and hover noise. Use these noise descriptions to explain how noise will impact a residence. Response to Item 40 in Data Request #1 stated that helicopter usage at any one location would be very brief as the lines are being strung. Both the noise report section and other PEA components note that the helicopters may be used to set poles. Helicopter activity for material transport and structure erection may have substantial noise and must be captured in our DEIR impact analysis.	This equipment will als construction. Impacts d similar to that described Based on the above sou road re-establishment a the City of San Diego r within less than 100 fee is expected. It should be noted that medium helicopters w anticipated. Although used for various projec to) transporting steel materials/equipment to be used by vehicles that Detailed information r applicable flight plans occur at any point alon construction. Helicopte 100 feet to any reside particular phases of fli etc.) for heavy lift heli be located. Maximum H data request responses	ue to this s d in Section and levels, nd mainter toise code et of any ac at this tim henever po- it is not an t-related ac poles on the right-or t would no egarding t are not ava g the line, er operatio ence. Infor ght (transi copters has helicopter r	tage of cor n 4.10.4.2, construction nance woul 75 dBA lime cess road. e, the Projection possible, with nticipated, etivities succ r pole segon f-way if the rmally delive he type of ilable, as he depending n could of mation detive tion noise, s not been noise levels	struction v Question 1 n sound lev d only be e nit if a resic A Less Tha ect is propo- th heavy lif heavy lift th as (but n gments or he proposed ver this ma helicopter elicopter w on condition cur as clo tailing the level fligh well docur have been	vill therefor Oa of the Pl vels due to expected to dence were an Signification osing to use ft helicopters ot necessar other co d access roa derived and pons in the fi ose as appr sound leve the noise, ho nented and provided in	e be EA. access exceed located int Impact e light and er use not a could be ily limited ily limited instruction ads cannot d and the potentially eld during roximately els during ver noise, could not n previous		

#	Ref	Question Description	SDGE Response								
			below, including for heavy lift helicopters. The data in this table provides the maximum sound levels at various distances for helicopter use ranging from medium lift to heavy lift helicopters. These maximum sound levels provide the worst case scenario for helicopter use, and can therefore be used to determine worst case impacts (i.e., other flight phases are anticipated to generate lower noise levels). Table 2 shows that heavy lift helicopter sound levels will be significantly louder than light or medium lift helicopters. There are no practical mitigation measures to reduce noise if heavy lift helicopter use is required, the Applicant will notify residential areas near proposed helicopter use and advise them of the nature and proposed timing of their use. This practice is in keeping with past transmission line projects. Table 2: Maximum Helicopter Sound Levels								
						n Noise Lev	rel (dBA)				
			Equipment	100 feet	200 feet	500 feet	1,000 feet	2,000 feet			
			Light/Medium Helicopter at Takeoff ⁽¹⁾	84	78	70	62	55			
			Sikorsky S61 ⁽²⁾	100	94	88	80	73			
			Sikorsky Skycrane S64 ⁽²⁾	102	96	90	82	75			
			Notes:Note that Sikorsky S61 and S64 (heavy lift) helicopters are not currently anticipated to beused on the Proposed Project. Although it is not anticipated, heavy lift helicopters couldbe used for various project-related activities such as (but not necessarily limited to)transporting steel poles or pole segments or other construction materials/equipment to theright-of-way if the proposed access roads cannot be used by vehicles that would normallydeliver this material.Sources: (1) TRC, 2001; (2) FAA								

#	Ref	Question Description	SDGE Response
116	N/A	Define the duration of construction activities along Segment C and how long the transmission corridor trail or any portion of the transmission corridor trail is anticipated to be closed. Please also provide records of any conversations SDG&E has had with the City of San Diego's Park and Recreation Department concerning potential trail detours that will allow trail access during the entire Segment C construction process. Segment C includes access roads that are used as trails through the Del Mar Mesa Preserve. The transmission line access road/trail is the primary trail that affords north-south access to Los Peñasquitos Canyon Preserve from the north and one of the few trails in the Preserve that remains accessible.	Construction of Segment C is expected to last approximately 4 months. SDG&E completed a Wood to Steel pole replacement project for TL 13804 within Segment C approximately two years ago. TL 13804 involved more extensive construction activities within Segment C as compared to the Proposed Project since it involved replacing existing wood poles with tubular steel poles, in addition to reconductoring TL13804. SDG&E works diligently to keep trails open during construction and only closes off areas when necessary to maintain the safety of the public and the construction workers. Flaggers are also used to direct trail users during construction, similar to vehicular traffic control on roadways. Where feasible, temporary detours will be provided for trail users. Signs will be provided to direct trail users to the temporary trail detours. Access would be blocked as necessary with signage and construction fencing. Public use of the access roads within the transmission corridor would continue during the majority of construction to the extent feasible. It is anticipated that the access roads may be closed for short durations (4 hours to a few days), as needed for construction access/safety reasons.
			 Prior to and during construction, SDG&E typically coordinates with the City of San Diego Parks & Recreation Department staff and the area Ranger about the construction activities. In addition, SDG&E typically conducts a variety of types of outreach to inform the public about the construction activities. This outreach may include posting signage at trail entrances, hanging door hangers or mailing notices to surrounding property owners, HOAs, local park and trail groups, and community planning groups and meeting with local community groups. SDG&E has successfully completed numerous construction projects adjacent to trails and parks with minimal impact on trail users based on our outreach efforts. SDG&E representatives have met with staff from the City of San Diego Park and Recreation Department to discuss the Sycamore to Penasquitos Project, however, there have not been any specific discussions yet related to

#	Ref	Question Description	SDGE Response
			potential trail detours.
117	Data Request #1, Item 54	 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: 2. Current bi-directional ADT counts on all legs of the 	Response pending. The results will be submitted in approximately one month.
		following intersections:	
		a. Black Mountain Road/Carmel Valley Road	
		b. Camino Del Sur/Carmel Valley Road	
		c. Black Mountain Park Driveway/Carmel Valley Road	
		3. Peak hour turning movement counts, including bikes and pedestrians at the following roads:	
		a. Black Mountain Road/Carmel Valley Road	
		b. Camino Del Sur/Carmel Valley Road	
		c. Black Mountain Park Driveway/Carmel Valley Road	
118	N/A	If SDG&E has obtained permission from the property owner to use this site, SDG&E needs to provide an access plan (including construction ingress/egress) and define the limits of staging within the Torrey Santa Fe staging yard where no construction traffic enters Torrey Santa Fe Road.	Refer to Response No. 1 regarding property owner permission for the Torrey Santa Fe staging yard. As indicated in the attached Google map photo (Attachment DR2 – Q118) Torrey Santa Fe Road has been designed and constructed to accommodate access into the proposed staging yards located on both sides of the roadway via left turn lanes at the median break/access point along Torrey Santa Fe Road. SDG&E used the staging yards on both

#	Ref	Question Description	SDGE Response
		The public provided a number of scoping comments regarding the use of the Torrey Santa Fe staging yard and concerns about public safety. Torrey Santa Fe Road is the only access to a community with approximately 1,000 residents. Any impacts to traffic or hazards on Torrey Santa Fe Road pose a serious threat to public safety. If use is approved by the property owner, SDG&E must provide an access plan and define the limits of staging that would allow all traffic to enter and exit the staging yard without any impact on Torrey Santa Fe Road if SDG&E intends to use the Torrey Santa Fe staging yard.	sides of the roadway for previous construction projects and there were no impacts to traffic or hazards associated with the staging yard construction traffic. The Google map photo below shows the areas being used as staging yards. When the staging yards on both sides of the road are developed in the future, construction traffic and traffic from the future development will utilize the same existing access points that are proposed for short term construction staging yard(s).
119	Data Request #1, Items 55 and 60	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. Construction activities on Carmel Valley Road would impact travelers on Carmel Valley Road. The PEA and SDG&E response to Data Request #1 do not provide adequate information to determine how traffic activities would affect traffic flow, traffic hazards, and emergency vehicle access. Please address the following:	Response pending. The results will be submitted in approximately one month.
		 Will Project construction require complete closure of the road (i.e., closure in both directions) at any time? Where would these closures occur along Carmel Valley Road? What is the maximum duration and expected frequency of any closures? Will construction require closure of one direction of traffic on Carmel Valley Road (e.g., closure of all eastbound lanes) at any time? Where would these single-lane closures occur along Carmel Valley Road? What is the maximum duration and expected frequency of any single-lane closures? 	

#	Ref	Question Description	SDGE Response
		 Question Description Would construction occur in more than one location at a time along Carmel Valley Road? If so, where would this occur? Would traffic be restricted at the intersections with Black Mountain Road and Camino Del Sur during construction? How would the restriction affect turning? Would the restriction cause single-lane closures? What is the maximum duration of each traffic restriction at the intersection? How often would the restriction be in place? a. Can construction be completed with intersections open in all directions and for all turning movements? 	
120	N/A	Describe how long lane closures, road closures, or other traffic restrictions would be needed for construction activities on aboveground transmission segments (Segments A, C, and D). Construction activities on roadways along Segments A, C, and D would impact travelers on those roadways if any traffic restrictions are required for construction activities, including material delivery and power line stringing. Will construction require complete or single-lane closure of any road or highway (i.e., closure in both directions) at any time? What is the expected roadway/highway, location, duration, and frequency of any complete or single-lane closure during construction?	For City streets, the Proposed Project includes the installation of guard structures (as depicted in the GIS data) to avoid the need for road closures during the stringing of overhead power and transmission lines across roadways within Segments A, C and D. Typically, vehicles associated with the installation of guard structures are staged outside of the public right-of- way to minimize the need for lane closures. However, there is the potential for a short-term lane closure during the installation of guard structures. Any lane closures would ultimately be done in accordance with the Traffic Control Permit issued by the City of San Diego. Where the Proposed Project crosses freeways (Interstate 15 and two locations across SR-56), additional traffic control measures will be required. An Encroachment Permit will be obtained from Caltrans for the freeway crossings and the conditions of the permit will be complied with. Typically short traffic breaks are conducted by the California Highway Patrol at off- peak hours (usually early on Sunday mornings) to protect the public during stringing operations. There is typically a 5 to 10 minute stoppage of traffic both directions to allow the helicopter to bring a sock line across the roadway up to, and through the next tower. If a single lane road closure is needed for a temporary guard structure in the center of a major interstate,

#	Ref	Question Description	SDGE Response
			this lane will most likely be closed through the day until stringing operations are complete for the day.
121	N/A	Verify that construction equipment and vehicles could be transported on public roadways. The PEA provided inadequate information to determine whether equipment and vehicles can be operated on narrow roadways or roadways with tight curves in the Project area. Verify that roads meet the widths and turn radii necessary to accommodate Project vehicles. For roads that cannot accommodate Project vehicles, define what alternative methods would be used for delivering the poles and equipment. Identify which poles may require this alternative delivery method.	 Typically, the construction equipment and vehicles utilized for transmission line projects such as the Proposed Project can be transported on public roadways such as those found in the Project area. At the present time a construction contractor has not been selected for the Proposed Project. In lieu of having information on the specific equipment the contractor will utilize to construct the project, SDG&E has analyzed public roadways and right-of-way access along the Project alignment. There are locations where existing roadways and ingress/egress may prove to be challenging based on limited turn radius. These locations include but are not limited to the following: Stonebridge to P5 and P6 Legacy Road to P9 Angelique Street to P12 Aldercrest to P14 Scripps Poway Parkway to P15 and P16 Ivy Hill Drive to P20 and 21 Bassmoore Drive to P33 Potential alternative methods for delivering structures and equipment may include, but are not necessarily limited to: Modification of existing, or creation of new temporary access to work locations. Site specific structure designs that limit the shaft or tube lengths of the tubular steel poles. By reducing the shaft lengths, alternate vehicles capable of achieving the required turn radius could be utilized. Use of a heavy lift helicopter to deliver pole sections to the proposed installation sites.