

SDG&E Response
Cleveland National Forest Power Line Replacement Projects
Notice to Proceed #001 Data Request 02, Dated October 25, 2016

California Public Utilities Commission (CPUC) Bullet #1

Please provide environmental resource survey results that have occurred since issuance of NTP-1 for all work areas and access roads. The CPUC requests that environmental resource survey results be provided in the Weekly Reports submitted by SDG&E in accordance with Section 3.5 of the MMCRP.

San Diego Gas & Electric Company (SDG&E) Response:

In accordance with Mitigation Measure (MM) BIO-22 of the Project's Mitigation Monitoring Compliance and Reporting Program (MMCRP), and documented in the Weekly Environmental Compliance Reports submitted to the CPUC and the U.S. Forest Service (USFS), approved Environmental Inspectors (EIs)/Biological Monitors (BMs) conducted pre-construction surveys at each work area. Additionally, all work areas were surveyed for special-status plant and wildlife species by a qualified biologist prior to the commencement of construction, in accordance with APM BIO-02. If special-status species are identified during these surveys, the species and any required actions are documented in the Weekly Environmental Compliance Report. In addition, an approved EI/BM was present at the construction sites during all initial ground-disturbing and vegetation-removal activities, and monitored Project construction activities in accordance with MM BIO-3 and MM BIO-22. Documentation of compliance with these measures are included in the Weekly Environmental Compliance Reports.

If any additional required resource surveys are conducted prior to vegetation removal or grading at a particular work area authorized by the CPUC and USFS under a Notice to Proceed (NTP), the results of those surveys will be summarized in the Weekly Environmental Compliance Report.

CPUC Bullet #2

Please explain how SDG&E is quantifying and tracking impact acreages per the different roadway classifications: maintained, construction-only and navigation. Please ensure that the response considers whether removal of vegetation for fire safety requirements and overland travel for non-previously disturbed habitat is being quantified and included in the project's overall acreage of disturbance impacts.

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SDG&E Response:

SDG&E's access roads are classified into the following three categories according to when the road is intended to be used:

- 1) **Construction-Only:** These roads are intended to be used solely during construction of the Project and, depending on local site conditions, may require improvement or repair prior to or during construction. For construction-only roads that require improvements or vegetation clearing for fire management, impacts to the associated vegetation communities will be documented and provided to the CPUC in an updated impact table for that particular Project component.
- 2) **Maintenance:** These roads are currently maintained by SDG&E and are intended to be used during construction for various activities, such as ingress and egress, and as part of the work areas, including material lay down, stringing sites, and external load pick-up locations as well as throughout the operation and maintenance phase of the Project. Depending on local site conditions, improvement or repair of these roads may be required prior to, during, or following construction as described in Section 4.6 Access Road Modification of SDG&E's April 2013 Revised Plan of Development and in Section B.5 in the Final Environmental Impact Report/ Final Environmental Impact Statement (FEIR/FEIS). In addition, SDG&E's Transmission, Construction, and Maintenance Department will continue maintaining these roads as per standard practice. SDG&E Maintenance roads within the Cleveland National Forest (CNF) will only be maintained for operation and maintenance if included in the USFS Master Special Use Permit (MSUP) that was issued on September 19, 2016. SDG&E does not anticipate any impacts to vegetation associated with these roads because these roads are regularly maintained and SDG&E is not proposing to widen SDG&E maintained roads at this time. If it is determined by the construction contractor that an SDG&E-maintained road needs to be widen or lengthened, a Minor Project Refinement Request (MPRR) will be submitted to the CPUC for review and approval. Within the MPRR, impact calculations will be provided.
- 3) **Navigation:** This category includes both public and private roadways not maintained by SDG&E that are intended to be used for construction and/or operation and maintenance of the Project for activities, such as ingress and egress, and as part of the work areas, including material lay down, stringing sites, and external load pick-up locations. This category also includes identified overland travel routes intended to be used during construction only, and sometimes referred to as "overland road access". However, there are no navigation roads that are overland travel routes within the Cleveland National Forest. No improvements or repairs to these roads and routes will be conducted as part of the Project. However, SDG&E will conduct minor hand brushing (no grading) of

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navigation roads, including “overland road access,” if field conditions have changed since the route was initially identified during the permitting process. Hand brushing at these limited access routes will be conducted if required to safely utilize the road or to remain in compliance with the Project’s approved Construction Fire Prevention/Protection Plan.

If a navigation road or “overland road access” has not been previously used by the landowner or SDG&E during operations and maintenance (i.e., no two-track or other distinguishable path) and if SDG&E determines that hand brushing is required, the activity will be listed on the One Week Look Ahead Schedule provided to the CPUC, the temporary impacts to the associated vegetation community will be documented, and an updated impact table will be submitted to the CPUC.

CPUC Bullet #3

Please further clarify the term “overland road access” as it relates to the three access road categories included in NTP-1. The response shall include whether impacts from overland travel to vegetation that was not previously disturbed for operation and maintenance activities is considered an impact to vegetation communities.

SDG&E Response:

As discussed in the previous response, “overland road access” only pertains to the Navigation category for access roads, and it includes the use of two-track roads and cross-country travel to access poles and workspaces. Use of “overland road access” will only be considered as an impact to sensitive vegetation communities if the route had not been previously used or disturbed by the landowner or SDG&E during operations and maintenance and if SDG&E determines that hand brushing is required. Provided that both conditions are met, hand brushing will be included on the One Week Look Ahead Schedule provided to the CPUC, the temporary impacts to the associated vegetation community will be documented, and an updated impact table will be submitted to the CPUC.

CPUC Bullet #4

Please provide an update for acreage disturbed to date for each pole site, access route and associated work space. The acreage disturbed to date shall include maps and supporting acreage tables by project component (i.e. pole site, access routes, laydown yards, etc.).

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SDG&E Response:

This information, including updated workspace maps and an impact table, was provided to the CPUC on October 14 and 18, 2016. At this time SDG&E has not conducted any vegetation brushing/clearing on any “overland road access,” navigation roads, and construction only roads not captured within NTP Requests or MPRRs. SDG&E will continue to update the impact table and workspace maps with impacts to vegetation.