

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 15, 2016

Mr. Don Houston
Environmental Project Manager
San Diego Gas and Electric Company
1010 Tavern Road
Alpine CA, 91901

(Sent via email: DFHouston@semprautilities.com)

Subject: Master Special Use Permit and Permit to Construct Power Line Replacement Projects – (Application No. 12-10-009) – Notice to Proceed (NTP) 1–Data Request

Dear Mr. Houston:

San Diego Gas & Electric (SDG&E) has requested authorization from the California Public Utilities Commission (CPUC) to initiate construction for the Tie Line (TL) 625B and TL629E, and other supporting facilities as described in the SDG&E NTP Request #1 dated July 25, 2016.

The CPUC has reviewed materials submitted to date by SDG&E and requests that SDG&E provide the information requested in *Attachment A* in order to make a determination on the potential approval of NTP Request #1. The information requested is categorized into the following two components: 1) Outstanding Pre-Construction Submittals and 2) Clarifications on NTP Attachment A: NTP # 1 Components Map TL625B/TL629E.

The CPUC is aware of several pre-construction plans and reports currently undergoing agency review, such as the Special Status Plant Salvage and Relocation Plan (MM BIO-15), Access Road Condition Evaluation and Repair Design Report (HYD-4), Gate Plan (REC-2), Historic Properties Management Plan, etc.; therefore information on these plans or reports is not included in this request for information.

The CPUC would appreciate a response to this letter by August 19, 2016.

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If you have any questions regarding this letter or need additional information, please contact me at 415.703.1966 or lisa.orsaba@cpuc.ca.gov.

Sincerely,

MJ Orsaba

Lisa Orsaba
CPUC Environmental Project Manager

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Att: Attachment A – Notice to Proceed #1 Data Request 1

Attachment A

Notice to Proceed #1 Data Request 1 Master Special Use Permit and Permit to Construct Power Line Replacement Projects

Outstanding Pre-Construction Submittals

- BIO-1: **Confine all construction and construction-related activities to the minimum necessary area.** Provide maps showing approved work limits as reflected in final engineering plans and proposed locations for temporary restricted access signs. Provide the acreage of disturbance that will result based on the approved work limits.
- BIO-9: **SDG&E shall identify all proposed replacement pole locations within the vicinity of RCAs.** Provide documentation that the following has been submitted to the USFS:
- Map of pole and access road locations in the vicinity of RCAs
 - Final approval by USFS, if applicable, of relocation of poles outside of RCAs
- BIO-10: **Limit temporary and permanent impacts to jurisdictional features to the minimum necessary.** Provide documentation of all permits obtained (RWQCB 401, and CDFW SAA) and:
- Maps showing delineated work areas and proposed flagging or fencing area
 - Documentation of implementation of permit terms and conditions
- BIO-11: **Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands.** Provide documentation of the following for the applicable segment of this NTP (TL 629E):
- No net loss of jurisdictional waters and wetlands
 - Documentation of consultation with permitting agencies
 - Documentation of compensation
- BIO-14: **Install fencing or flagging around identified special-status plant species populations in the construction areas.** Provide a map of special-status plant species (GPSed) and location of construction flagging/fencing.
- BIO-16: **Implement special-status plant species compensation.** Provide a map showing the proposed flagging or fencing areas. Please provide documentation that the report prepared under this mitigation measure has been submitted to CDFW and the U.S. Fish and Wildlife Service (USFWS), as stated in ATTACHMENT B: PRE-CONSTRUCTION STATUS REPORT, SDG&E U.S. Fish USFWS and CDFW.
- BIO-21: **Quino Checkerspot Butterfly and Hermes Copper Butterfly:** Provide maps showing occupied/suitable habitat and a construction schedule in occupied/suitable habitat areas. Provide documentation of coordination with USFWS or field verification (construction occurs outside of 1 kilometer (0.6 miles of known or newly discovered occurrences)).

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- BIO-24, 26,27: **Enforce speed limits in and around all construction areas; Prohibit littering and remove trash from construction areas daily; Prohibit the harm, harassment, collection of, or feeding of wildlife:** Provide documentation that measures are included in the contractor specifications
- BIO-30: **Prior to work being conducted, measures will be employed to protect (a) Townsend's bat and (b) bats in general.** Provide documentation of the following:
- Surveys and results have been provided to the CDFW South Coast Regional Office
 - CDFW notification if species maternity roosts present
- CUL-3: Provide the following:
- Documentation indicating completion of all measures provided in the cultural resources report prepared by ASM for each power and distribution line.
 - Map identifying all environmentally sensitive areas to be flagged and avoided during construction
- PHS-6: While not a pre-construction requirement, if helicopter activities are proposed within the first 30 days of construction, please clarify conformance with this measure with respect to the Helicopter List Plan and Federal Aviation Administration requirements.

Clarifications on NTP Attachment A: NTP #1 Components Map TL625B/TL629E:

The maps submitted by SDG&E on 5/1/15 (email: A.12-10-009 CNF ED10-SDGE CONSOLIDATED RESPONSE 05-01-15), TL 625 map book (4-29-15); TL 629 map book (4-29-15), which were used for analysis in the Project's Final EIR/EIS were used to review the NTP #1 Components Map TL625B/TL629E, provided in Attachment A of the NTP #1 Request. CPUC Notes the following discrepancies and requests the following clarifications:

- Attachment A: NTP # 1 Components Map TL625B Map 11 of 12, Page 17 of the NTP Request shows road, stringing sites, and pole top activities for TL 625D. Please clarify if this map was included in error, as activities along the TL 625D do not appear to be requested in NTP #1.
- The following clarifications regarding **ROADS** identified in the NTP Request are requested:
 - NTP #1, Attachment A identifies three types of access roads: Construction-only, Maintenance, and Navigation. Please explain the differences between these types of roads and use and similarly, clarify if improvements or maintenance are associated with specific road types/are proposed under NTP #1.
 - NTP #1, Attachment A identifies new roads (either construction, maintenance, or navigation) not previously identified in the TL 625 and TL 629 map books dated 4-29-15. Please clarify how the Final EIR/EIS evaluated use of these newly identified roads.
 - Clarify which roads identified in NTP #1 are SDG&E exclusive use roads. If none exist for TL 625B and TL 629E, please state this.

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- NTP #1, Attachment A, Page 11 (Attachment A: NTP #1 Components Map TL625B Map 5 of 12) shows temporary and permanent road disturbance adjacent to Z272867. This was not identified in the corresponding 4-29-15 TL 652 map book, Page 9. Please quantify this acreage and habitat impacts.
3. The following clarifications regarding **POLE** activities identified in NTP #1 are requested:
- Numerous labels (R, S, N), and in some cases, pole locations in NTP #1, Attachment A do not correspond to the 4-29-15 map books for TL 625 and 629. Please revise the NTP request accordingly, or provide rationale for each pole showing a different label or location.
 - Please describe the “Pole Top Only” locations shown in NTP #1, Attachment A and activities associated with these locations. These activities are not identified as such in the 4-29-15 map books. Also, please describe these activities in relation to the Final EIR/EIS and explain the type of impacts associated with this work (i.e. if no impacts occur, please explain why).
 - Please explain how pole topping activities along TL629C, and TL629D have met pre-construction requirements (e.g. landowner notification) as applicable.
4. The following clarification regarding **GUARD STRUCTURES** identified in NTP#1 is being requested:
- Please explain if guard structures are proposed along TL 625B and TL 629E alignments, as they are included in the 4-29-15 map books.
5. The following clarifications regarding **STAGING AREAS** identified in the NTP Request are being requested:
- Please quantify acreages habitat disturbance by type associated with the staging areas compared with previous anticipated acreages. Please confirm that all staging areas were previously identified in the 4-29-15 map book set.
 - The Sweetwater Staging Area (NTP #1, Attachment A, page 10) was previously shown as a stringing site in the 4-29-15 map book (page 6, TL 625). Please clarify the impact differences.
 - The Merrigan Staging Area and Anderson Staging Area are along alignments TL 629A and TL 629C. Please describe how SDG&E has satisfied pre-construction requirements for these areas (i.e. surveys, public notification, etc.), as they are outside TL 625B and TL 629E.
6. The following clarifications regarding **STRINGING SITES** identified in the NTP Request are being requested:
- SDG&E states in the NTP#1 Request: “Due to changes in site conditions and to facilitate constructability, some of the stringing site and yard boundaries were refined relative to the last Geographic Information System data set submittal in February 2015 in response to CPUC Data Request #9.” In its review of the NTP #1 Attachment A, CPUC has found numerous

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additional, modified, or eliminated stringing sites proposed in and not previously identified in the 4-29-15 map book. Because of this, CPUC requests that SDG&E provide revised maps showing 1) the extent of the biological and cultural survey area for the Project, 2) a quantification of temporary disturbance compared to that of the Final EIR/EIS, and 3) a quantification of impacts by habitat type in relation to the Final EIR/EIS.