

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 25, 2013

Ms. Jennifer Pierce  
San Diego Gas and Electric Company  
8326 Century Park  
San Diego, CA 92123-4150

**RE: Review of San Diego Gas and Electric Company's Application for a Permit to Construct the Salt Creek Substation Project (A. 13-09-014)**

Dear Ms. Pierce:

The Energy Division of the California Public Utilities Commission (CPUC) has completed its first review of San Diego Gas and Electric Company's (SDG&E) application (A. 13-09-014) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct the Salt Creek Substation Project.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of SDG&E's application for the Salt Creek Substation Project, the Energy Division found that the information contained in the Application and PEA is incomplete. The report that identifies the portions of the application found to be deficient was sent to you in a separate letter. The review of the Application and PEA identified a number of data needs that do not rise to the level of deficiencies. The data needs are identified in the attached Request for Additional Data.

Information provided by SDG&E in response to the Energy Division's finding of deficiency report and this Request for Additional Data should be filed as supplements to Application A. 13-09-014. We request that SDG&E respond to this request no later than November 24, 2013.

The Energy Division will review all supplemental information to assess the adequacy of the application and PEA and will issue a determination when information in SDG&E's application and PEA is deemed adequate and complete. The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SDG&E's Permit to Construct be approved.

Please direct questions related to this application, to Jason Coontz at the CPUC.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Coontz".

Jason Coontz  
California Public Utilities Commission

## REQUEST FOR ADDITIONAL DATA DATA NEEDS FOR THE SALT CREEK SUBSTATION PROJECT APPLICATION (A. 13-09-014)

### REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified several areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the proposed project in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

**Table 1: Application No. 13-09-014 Data Needs**

#	PEA Section, Page #	Data Need
<b>Application</b>		
1	Appendix E	<b>Identify locations where the notice of filing of application was posted on-site</b>
2	Appendix H	<b>Update the table in Appendix H to reflect all agencies and tribes contacted to discuss the proposed project. Provide records of correspondence with all agencies and tribes, including any comment letters received from the Native American Heritage Commission (NAHC) and tribes.</b>
<b>PEA Project Description</b>		
Access Roads		
3	Figure 3-40, page 3-15	<b>Define access routes from alternate staging areas to work areas. Please provide GIS data for these access routes.</b>
4	3.3.1.3, page 3-21; Appendix 3B, page 14	<b>Clarify whether the unpaved road north of the substation and within the ROW corridor would be used for access to the substation site during construction. Clarify if the culvert along the unpaved road will need to be upgraded. Please provide updated GIS data if the ROW corridor south of Hunte Parkway is proposed as a secondary construction access point.</b>
5	3.3.2, page 3-29	<b>Confirm that access roads shown on project maps are wide enough to allow for concrete truck access, turnaround, and passing, as required to construct concrete foundations at the engineered foundation poles.</b>
6	3.5.1.3, page 3-39, page 3-46	<b>Please identify turn around areas for access routes for all components of the project. Please also plan passing areas for roads where the roadway is not wide enough for two vehicles.</b>  The PEA does not describe turn around areas for access routes where a workspace may be insufficient, based on the size and number of vehicles and equipment. The

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#	PEA Section, Page #	Data Need
		PEA also states that overland travel routes would be approximately 12 feet wide, which is narrow for large vehicles.
7	3.5.2.1, page 3-40.	<b>Please provide a map showing where the transmission line access road will be realigned around pole locations, and provide the corresponding GIS data.</b>
8	3.5.2.1, page 3-41	<b>Describe whether rock or other stabilization measures will be used on access roads during wet conditions.</b>
9	3.5.2.1, page 3-42	<b>Confirm that there is sufficient space on access roads to transport cranes to work sites and to turn cranes around. Please also describe whether tree trimming or other adjustments would be made to provide adequate clearance for cranes.</b>
10	3.5.2.2 Page 3-46	<b>Clarify whether access road relocation and use of access roads for construction is considered "road maintenance" in SDG&amp;E's NCCP.</b>
TL 6965		
11	3.0.2, page 3-4	<b>Provide GIS data and maps of the existing infrastructure in the ROW (other transmission lines and structures).</b>
12	3.0.3, page 3-20	<b>Clarify whether "reconfiguring" TL 6910 as TL 6910 and 6964 involves anything other than a name change.</b>
13	3.03, page 3-20	<b>Provide a schematic diagram of the power line configuration.</b>
14	3.5.2.1, page 3-40, page 3-48	<b>Identify the stringing sites that would require grading.</b> The PEA states that minimal grading would be done at stringing sites. Grading is not typically done at stringing sites. Are there suitable alternative stringing sites that would not require grading?
15	3.3.1.4, page 3-22	<b>Clarify if the two 8-foot-high chain link gates proposed at the sewer access road entrance to the substation would prevent access to the sewer access road, or if the gates would only prevent access to the substation pad area, leaving the sewer access road open for other use.</b>
16	3.5.2.1, page 3-41	<b>Clarify whether any guy wire or support poles would be needed during construction or operation and maintenance of the proposed project.</b>
17	3.5.2.1, page 3-42, page 3-47	<b>Please identify locations of guard structures for crossings of energized electric lines and communications facilities.</b> The PEA maps appear to show guard structures only over roadways, but do not show guard structures around any other infrastructure, such as distribution lines. The PEA states, however, that guard structures would be used at crossings of energized electric and communications facilities.
18	3.5.2.1, page 3-42	<b>Please describe the circumstances where installed guard structures would be used and where bucket or boom trucks may be used for guard structures.</b> The PEA states that guard structures may be used or that bucket or boom trucks may be used for guard structures. There is a difference in impact between the use of installed guard structures and mobile vehicles.

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<b>#</b>	<b>PEA Section, Page #</b>	<b>Data Need</b>
19	3.5.2.1, page 3-42	<b>Please clarify if a "pull site" is the same as a "stringing site."</b>
20	3.5.2.2, page 3-46.	<b>Provide additional details on the location(s) of drainage crossings and how drainage crossings would be constructed to avoid impacts to state and federal jurisdictional waters.</b>  The project description states that drainage crossings may be used wherever feasible or necessary.
21	3.6.4	<b>Identify the locations of trees that are proposed for removal as a part of the project. Confirm that no tree trimming is required for the new power line.</b>
<i>Disturbance Areas</i>		
22	3.3.1.5, page 3-22	<b>Provide a figure and GIS data for the temporary work space that may be needed around the two adjacent duct trenches during construction. Please also identify the concrete truck workspace and washout area.</b>
23	3.3.1.5, page 3-23	<b>Confirm that manhole racking, terminations, and approximately 1,400 feet of copper cable from the substation to Hunte Parkway have been accounted for in the disturbed areas for the distribution circuits shown in Appendix 3-B.</b>
24	Section 3.5, Table 3-2	<b>Please describe the methodology used to calculate temporary and permanent disturbance areas, including any buffer areas added to work areas and trenched areas.</b>
25	3.5, Table 3-2 and 3-3	<b>Clarify the permanent disturbance at the Eastlake Parkway Staging Area.</b>  The PEA lists the permanent disturbance of the Eastlake Parkway Staging Yard as 0 acres. Table 3-3 says there will be earthwork at the staging area.
26	3.5.1.1, Page 3-35, Page 3-41	<b>Identify potential sources for class 2 aggregate and the distance to those sources.</b>
27	3.5.1.5, page 3-40	<b>Confirm that proposed landscaping and irrigation areas have been included in surface disturbance calculations, or please update the disturbance area calculations and GIS to reflect the landscaping and irrigation.</b>
<i>Substation</i>		
28	3.5.1.1, page 3-38.	<b>Please clarify whether SDG&amp;E or AT&amp;T would install the telephone line to connect the substation to AT&amp;T's existing facilities on Hunte Parkway.</b>
29	3.5.1.3, page 3-39	<b>Describe whether water from the proposed sewer access road drainage improvements would drain only into the detention basin, or if there will be additional outlets to natural drainages.</b>
30	3.5.4.1, page 3-49	<b>Identify the height of the masonry perimeter wall around the substation.</b>
<i>General</i>		
31	3.5.1.3,	<b>Provide the official name for the "public improvement permit" that would be needed</b>

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	page 3-40	<b>for the curb, gutter and driveway improvements at Hunte Parkway (e.g., "Principal Construction Permit").</b>
32	3.5.1.5, page 3-40	<b>Describe the water supply method for operation and maintenance of the project (e.g., importation by truck or new water line). If new water lines are proposed, describe the approximate distance (linear feet) and location for those lines.</b>  Water importation should be accounted for in the truck trip assumptions and air quality emissions estimates for the project.
33	3.5.2.1, page 3-41	<b>Describe how plywood would be adequately secured to prevent animals or people from becoming entrapped in excavations, or devise an alternate way (e.g., steel plates with packed soil around the edges) to secure excavations.</b>  Plywood is often easily warped and not well secured, such that animals or people may become entrapped in the excavation. Identify special precautions for these excavations, such as packing soil around gaps on the edge of the plating, to prevent human and animal entrapment in trenches.
34	3.6.4.1, page 3-63	<b>Provide a list of the 16 approved herbicides that may be used on the project.</b>
35	3.0.3, page 3-19	<b>Provide a map showing the Border Substation in relation to the project.</b>
36	GIS	<b>Provide all components for the following shape files:</b> <ul style="list-style-type: none"> <li>• <b>BiologicalStudyArea_2013.shp</b></li> <li>• <b>Municipal.shp</b></li> <li>• <b>Olympic_Proposed_Staging_Site.shp</b></li> </ul> <p>These three shape files were transmitted on October 11 and have missing elements. We received three elements, but do not have all of the components to create the shape file.</p>
<b>Minimization Measures</b>		
37	3.8, page 3-65	<b>The PEA states that all unpaved areas would be wetted at least three times daily. The measure, as written, does not allow for ceasing such activities if they are unnecessary to control dust. Please revise the measure to state the wind speed at which water will be applied and that water should be applied when traffic results in a visible dust plume.</b>
<b>Appendix 3B: Detailed Route Maps</b>		
38	All maps	<b>Please define what the various types of shading represent (e.g., solid yellow, solid red, striped yellow).</b>
39	All maps	<b>Please confirm that it is feasible to use the stringing sites as shown on the map or update the GIS data to show larger and/or realigned stringing sites. Some stringing sites seem smaller than needed, and some stringing sites are not aligned with the transmission line. Confirm the location of the stringing site.</b>
40	All maps	<b>Please define access roads to each work area/pole site. Some of the access roads fall short of reaching their destinations (see, for example, page 5 and page 10). Please</b>

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		<b>provide updated GIS that addresses these errors.</b>
41	page 1	<b>Please address whether any temporary workspace is needed for work at the Miguel Substation or associated existing or proposed access routes.</b>
42	page 2, page 3	<b>Identify access routes that may be used to bypass a bridge that is down.</b> There appears to be a downed bridge approximately 100 feet northwest of location 35 on page 3, leaving access to that location only from the south and a lack of access between Mount Miguel Road and work areas near the Miguel Substation.
43	page 8	<b>The access road on page 8 traverses parking lots. Please confirm that this is correct or please provide updated GIS data that shows the accurate access route.</b>
44	page 8	<b>Identify the number of parking spaces that would be temporarily or permanently impacted by the workspace and foundation pole at location 24.</b>
45	page 14	<b>Confirm that no additional work areas are required to upgrade the sewer access road.</b> The temporary work space around the sewer access road seems small given the amount of expansion and slope work that would be done.
46	page 15	<b>Please show where the 8-acre disturbance area would be located within the Hunte Parkway staging area. Show ingress/egress access road locations.</b> The PEA states in Section 3.5, Table 3-2, that the work area within the Hunte Parkway staging area would be 8 acres. The map shows the entire parcel as being disturbed.
<b>Aesthetics</b>		
47	Figure 4.1-27	<b>Identify the timing portrayed in the visual simulation at Key View 7.</b> The Aesthetics Section of the PEA includes a detailed and extensive Landscape Concept Plan (Figures 4.2-1 and 4.1-2). The substation and its Landscape Concept plan are graphically illustrated in the proposed project simulations in Key Views 7, 9, 10, and 11. The trees and understory appears large and mature in Key View 7 After (Figure 4.1-27). Does this representation show the vegetative screening immediately after implementation with large specimens, or does it demonstrate the conditions years after successful propagation of less mature landscape specimens?
48	4.1	<b>Describe the proposed treatment of steel poles to reduce glare.</b> Glare from galvanized steel is a common problem for new substations and transmission line towers that do not require steel suppliers to apply chemical post treatment to the steel that substantially reduces the surfaces reflexivity. On the SDG&E site visit the wood to steel poles were observed and they appeared to be non-specular. Will the poles for TL 6965 be treated similarly? Will the steel used at the substations also receive post treatment so they will not cause glare?
49	4.1, Figures 4.1-17 through 4.1-32	<b>Provide high resolution images for all key observation points.</b> The images from the "key views" presented in the PEA have been down sampled so severely that when one attempts to zoom-in to see details, the images are very pixilated. Please provide high resolution images of both the baseline and proposed conditions for all key observation points.
50	Appendix	<b>Describe the rationale used to define viewer sensitivity ratings.</b>

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	4.1-A	Appendix 4.1-A, the Aesthetic Technical Analysis uses a modified FHWA methodology to assess visual change. The addition of a third transmission line into the ROW will noticeably reduce the amount of open space in the ROW and add additional visual clutter to the Key Views that were identified. This clutter is directly related to two of FHWA criteria: intactness and unity. In the numerical rating portion of the analysis the intactness number typically drops by only 0.5 points with project implementation, whereas the unity scores often do not change. Please explain your rationale for this key quantitative portion of the analysis. There are also numerous vantage points (key views) along the City designated scenic routes. Please explain your rationale for giving these points a viewer sensitivity of 1.0 (low viewer sensitivity).
51	Figure 3-6	<p><b>Add labels and other details to Figure 3-6.</b></p> <p>The Preliminary Grading and Drainage Plan (Figure 3-6) is difficult to read and interpret due to the absence of labels. Please update the map to include:</p> <ul style="list-style-type: none"> <li>a) Labels for the topographic lines and existing and proposed contour intervals.</li> <li>b) The elevations of the tops and the toes of the slopes including the soil nail wall</li> <li>c) A label for the assumed brow ditch (8 foot wide flat area near mid slope in the proposed fill slopes).</li> <li>d) Label for the heavy line on the upslope side of the brow ditch (Is this a retaining wall?)</li> <li>e) Correct the graphic scale provided on the figure; it should match the distance callouts on the plan.</li> </ul>
52	4.1	<p><b>Provide a simulation of the substation retaining walls and masonry walls.</b></p> <p>There are no Key Views presented where the retaining wall(s) or masonry walls at the Salt Creek Substation are readily visible. Please provide representative photograph examples of the alternative walls.</p>
<b>Air Quality and Greenhouse Gases</b>		
53	4.3, page 4.3-5	<p><b>Update the air quality impact analysis to reflect the SCAQMD Air Quality Significance Thresholds. Define any measures that would be implemented during construction to reduce emissions below the SCAQMD thresholds.</b></p> <p>The SDAPCD (Rice 2013) stated that SDAPCD follows the SCAQMD CEQA guidelines because SDAPCD has not developed their own CEQA guidelines. The SCAQMD CEQA thresholds for construction emissions differ from the SDAPCD stationary source regulations that were used as the basis for analysis in the PEA. The SCAQMD construction emissions thresholds are more stringent for emissions of NO<sub>x</sub> and SO<sub>x</sub> than the SDAPCD stationary source regulations.</p>
54	Appendix 4.3, page 4.3.A-1.	<p><b>Please provide support for the assumption that 30 percent of heavy construction equipment will be Tier 3 equipment and 70 percent of construction equipment will be Tier 2 equipment.</b></p>
55	Appendix 4.3, page 4.3.A-2	<p><b>Please provide the emissions calculation tables A-30 to A-375 that are referenced in the PEA.</b></p> <p>The methodology references tables up to A-375. Appendix 4.3-B provides up to Table A-30.</p>

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56	Appendix 4.3 pages B-26 and B-32	<p><b>Please identify the mitigation that has been factored into emissions calculations listed in tables A-25 and A-30.</b></p> <p>It is unclear which mitigation is considered for the emissions listed in Tables A-25 and A-30 (i.e., APMs only, project design features and ordinary construction/operations restrictions only, or APMs and project design features and ordinary construction/operations restrictions).</p>
<b>Biological Resources</b>		
<i>Botany</i>		
57	Appendix 4.4-A, Appendix C, page 5	<p><b>Provide the Vegetation Enhancement Program to mitigate for impacts to grasslands.</b></p> <p>Page 5 of Attachment 4.4-A, Appendix C states: "If the project elects to use the NCCP for mitigation, it is recommended that the NCCP Enhancement Program also be used to mitigated impacts to grasslands." If SDG&amp;E elects to use the NCCP Enhancement Program to mitigate for impacts to grasslands, a Vegetation Enhancement Plan will need to be submitted to CPUC to document where grasslands will be enhanced/mitigated on-site and the methods that will be used to enhance grassland habitats.</p>
58	4.4	<p><b>Identify herbicides that may be applied within the project area, and other methods that may be used to control invasive and noxious weeds during and following construction of the project. Include MSDS sheets for the herbicides.</b></p>
59	4.4	<p><b>Provide GIS data for all biological surveys including vegetation mapping, rare plant surveys, wetland surveys, and focused special-status species surveys.</b></p>
60	4.1, page 4.1-5	<p><b>Provide a list of seeds and plants that may be used on the project, including landscape plantings.</b></p>
61	Appendix 4.4-A, Appendix C, page 2	<p><b>Provide a copy of the SDG&amp;E proved pole matrix, dated April 3, 2012. This document is referenced on Page 2 of Attachment 4.4-A, Appendix C.</b></p>
<i>Wetlands</i>		
62	4.4, pages 4.4-22 and 4.4-33	<p><b>Provide additional supporting documentation to define the limits of federal and state jurisdictional waters.</b></p> <p>Wetland and riparian areas are inconsistently calculated in the PEA. Table 4.4-1 identifies 2.24 acres of riparian and wetland vegetation communities in the Salt Creek Substation and transmission corridor. Table 4.4-2 identifies 0.805 acre of potentially jurisdictional waters within the Substation and transmission corridor (a reduction of 1.39 acres). Please explain the differences in wetland acreages.</p> <p>The reduced area of potentially jurisdictional waters was defined during a reconnaissance-level survey conducted by AECOM on March 21, 2012. A single day of field work is inadequate to delineate wetlands and riparian areas in the entire transmission corridor in a manner consistent with agency guidance manuals. A detailed wetland delineation, or U.S. Army Corps of Engineers (Corps) and CDFW verification of the previous delineations, is required to define the limits of waters of the U.S. and waters of the State.</p>



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#	PEA Section, Page #	Data Need
63		<p><b>Obtain state and federal concurrence with the non-jurisdictional determination for concrete ditches within the substation property.</b></p> <p>Corps and CDFW verification is required to determine jurisdiction over the concrete ditches located on the Salt Creek Substation property. The consultant recommendation that the concrete ditches are not jurisdictional must be substantiated by a letter from the Corps and CDFW. Alternatively, SDG&amp;E may assume that these areas are subject to Clean Water Act jurisdiction under Regulatory Guidance Letter 08-02. SDG&amp;E may then apply for state and federal permits to fill these resources.</p>
64	4.4, page 4.4-100	<p><b>Provide additional evidence to support the conclusion of no effect to wetlands or riparian areas.</b></p> <p>The PEA states, "The Transmission Corridor and potential ground-disturbing activities are located away from potential jurisdictional waters and wetlands, and no structures or string sites would be placed within jurisdictional waters or wetlands." This statement is inconsistent with the wetland delineation reports and findings in the PEA that there are potentially jurisdictional waters located within the Transmission Corridor and Substation. The wetland and riparian area map set in the BRTR does not include the locations of poles, access roads, or other work areas.</p>
<i>Wildlife</i>		
65	Appendix 4.4-A	<p><b>Provide records of all correspondence with USFWS and CDFW. The following correspondence is required at a minimum:</b></p> <ul style="list-style-type: none"> <li>a) <b>Email between Erin McCarthy and Alison Anderson dated March 16, 2011 and approving the modified Quino checkerspot butterfly (QCB) protocol</b></li> <li>b) <b>Any correspondence with USFWS and/or CDFW regarding the 2011, 2012, and 2013 QCB survey results or any comments on the survey reports.</b></li> <li>c) <b>Correspondence with USFWS and/or CDFW regarding the 2011 and 2012 coastal California gnatcatcher (CAGN) survey results and methods, and any comments on the survey reports. Provide records of notification submitted to USFWS in accordance with the survey guidelines for CAGN, specifically, "The permittee shall notify the appropriate Service Fish and Wildlife Office in writing, at least ten (10) working days prior to the anticipated start date of survey work and receive approval prior to beginning work."</b></li> <li>d) <b>Correspondence with USFWS and/or CDFW regarding the least bell's vireo survey results and methods, and any comments on the survey report.</b></li> </ul>
66	Appendix 4.4-A	<p><b>Provide surveyor qualifications and 10(a)(1)(a) permits for each QCB surveyor. Provide surveyor qualifications and permits, as appropriate for the coastal California gnatcatcher, least bell's vireo, and western burrowing owl surveys.</b></p>
67	Appendix 4.4-A	<p><b>Provide additional data to document locations of least bell's vireo and occupied habitat within the transmission corridor.</b></p> <p>Section 4.4 of the PEA and the Biological Resources Technical Report lacks survey results or data from presence/absence surveys for least bell's vireo within the transmission corridor. The PEA states that protocol surveys for least bell's vireo were only conducted for the substation area. The vegetation mapping for the project indicates that there is potential least bell's vireo habitat within the transmission corridor</p>

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		<p>(i.e., riparian woodland, southern willow scrub, riparian scrub, mulefat scrub). Further, the results of the California gnatcatcher survey indicate that least bell's vireo were observed during surveys of the transmission corridor.</p> <p>Please provide the following information:</p> <ul style="list-style-type: none"> <li>a) Identify the locations where least bell's vireo were observed during other species surveys including the California gnatcatcher survey.</li> <li>b) Conduct a survey within all riparian areas and other potential vireo habitats within the transmission corridor following the USFWS Least Bell's Vireo Survey Guidelines, dated January 19, 2001. SDG&amp;E may alternatively assume that all least bell's vireo habitat in the transmission corridor is occupied and conduct pre-activity surveys following agency protocols and in accordance with the NCCP.</li> <li>c) Provide the survey report(s) if a previous survey was conducted for least bell's vireo within the transmission corridor. If SDG&amp;E is proposing to use a reduced survey effort for least bell's vireo within the transmission corridor, SDG&amp;E must obtain USFWS concurrence with the survey approach and submit a record of USFWS concurrence to CPUC.</li> </ul>
68	4.4	<p><b>Provide substantial evidence to support the determination that there will be a less than significant impact to Quino checkerspot butterfly in the absence of habitat mitigation.</b></p> <p>Additional information is required to support the conclusion in Section 4.4 of the PEA that no mitigation is required for impacts to Quino checkerspot butterfly suitable habitat. We understand that compensation acreage was acquired within the Otay Ranch Preserve when the substation parcel was purchased; however, this acreage does not compensate for effects to species on the power line corridor.</p>
69	4.4	<p><b>Provide biological survey data for alternative staging areas at the Olympic Training Center.</b></p>
<b>Cultural Resources</b>		
70	4.5, pages 4.5-2, 4.5-13 to 4.5-15	<p><b>Consider surveying larger areas along the alignment for cultural resources to allow for flexibility during project construction.</b></p> <p>The cultural resource report states that the survey area includes 10 feet on either side of the access road. Larger areas should be surveyed to allow for flexibility when constructing the project. If any poles, roads, etc., need to be relocated during construction, relocation would not be allowed without additional CEQA review unless the area was previously surveyed.</p>
71	4.5.3.1, page 4.5-8	<p><b>Please provide written documentation of any correspondence with the Native American Tribes including correspondence since the PEA was completed.</b></p> <p>SDG&amp;E's correspondence with Native American tribes is identified in the PEA (Page 4.5-8). Letters were mailed to local Native American tribal groups and/or individuals listed by the NAHC. The PEA states that only one response was received. Please provide this correspondence and discuss any measures taken by SDG&amp;E to respond to tribes. Given the number of archaeological resources in the project area and Native American interest in the region, has any additional outreach been performed or additional correspondence received from the tribes?</p>

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#	PEA Section, Page #	Data Need
72	4.5.3.1, Table 4.5-1	<p><b>Revisit and revise the classification of archaeological sites CA-SDI 4529, 7197, 8651, and 12067.</b></p> <p>Table 4.5.1 (PEA 4.5.9) describes "potentially significant" CA-SDI sites 4529, 7197, 8651, 12067) as "lithic scatters;" however, the diversity, types, and amounts of tools and groundstone found in these sites indicates that these sites are camps/habitation sites, or multi-use sites and not just lithic scatters.</p>
73	4.5.6, pages 4.5-27 to 4.5-29	<p><b>Revise the APMs CUL-1, CUL-2, CUL-3, and CUL-6 to include additional information to show that the measures are effective in reducing impacts to a less-than-significant level and are implementable. These revisions may alternatively be incorporated into a revised measure to address Deficiency 8, identified in the Deficiency Report for this project.</b></p> <ul style="list-style-type: none"> <li>• <b>CUL -1:</b> Identify the appropriate work practices necessary to effectively implement APMs and the procedures to be followed upon the discovery or suspected discovery of archaeological materials so that readers can evaluate whether it is adequate for minimization of impacts.</li> <li>• <b>CUL-2:</b> Specify what monitoring entails – the monitor should be a qualified archaeologist. Monitoring should be performed by a qualified cultural resource specialist/ archaeologist. A no-work buffer should be established for any discoveries. The measure should specify the criteria by which the resource will be evaluated for significance (i.e., (1) eligible for the CRHR (and thus a historical resource for purposes of CEQA); or (2) a unique archaeological resource as defined by CEQA). The CPUC should be consulted for the determination of impacts and to ensure no substantial change would occur. See the deficiency report. A Cultural Resources Monitoring and Management Plan (CRMM) and a Treatment Plan (TP) should be prepared before the start of construction. The provisions identified here can be incorporated into a measure requiring a CRMM and TP.</li> <li>• <b>CUL-3:</b> The measure does not specify the steps to be followed if a resource is found along an access road. Monitoring does not reduce effects to less than significant levels. The measure should specify the specific actions that must be taken to reduce effects to less than significant levels. The provisions identified here can be incorporated into a measure requiring a CRMM and TP.</li> <li>• <b>CUL-6:</b> A no-work buffer should be established for any paleontological discoveries. The measure should specify the criteria by which the resource will be evaluated for significance. The CPUC should be consulted for the determination of impacts and to ensure no substantial change would occur. The steps to be taken to allow work to resume should be identified in the measure.</li> </ul>
<b>Geology and Soils</b>		
74	4.6	<p><b>Please provide information on where the soil stockpiles will be located, both for temporary storage at the various work sites and for import soil.</b></p>
75	Appendix 4.6-B	<p><b>Please provide data for corrosion testing within the proposed substation area and the transmission line corridor, or state when these data will be collected.</b></p> <p>There is one corrosivity test result from the URS (2011) geotechnical investigation of TL 13826, included in Appendix 4.6-B to the PEA. There is no information in the geotechnical reports that describes any corrosion testing that was performed on soils</p>

**Review of San Diego Gas and Electric Company's Application for a Permit to Construct the Salt Creek Substation Project (A. 13-09-014)**

**Table 1: Application No. 13-09-014 Data Needs**

#	PEA Section, Page #	Data Need
		within the proposed substation area or the majority of the transmission line corridor.
<b>Hazards and Hazardous Materials</b>		
76	4.8.4, pages 4.8-12 through 4.8-17	<p><b>Please provide the Hazardous Substance Control and Emergency Response Plan (HSCERP) for the project, if one has been prepared. Alternatively, please provide confirmation and justification of whether an HSCERP is required for the project and will be prepared at a later date.</b></p> <p>Appendix 1-A, CPUC Checklist, requires inclusion of a HSCERP, if required. It is stated in the right-hand column that this plan is addressed in Section 4.8 of the PEA. There is no HSCERP included with the PEA. There is no mention of an HSCERP in Section 4.8 of the PEA.</p>
<b>Hydrology and Water Quality</b>		
77	Question 4.9b, page 4.9-17	<b>Please estimate the quantity of water that will be required for operation and maintenance of the project.</b>
<b>Land Use</b>		
78	4.10	<b>Provide records of all correspondence and meetings held with the City of Chula Vista and the University Framework Committee regarding the Salt Creek Substation Project and site selection.</b>
<b>Noise</b>		
79	4.12.3.2, Table 4.12-5, Page 4.12-12	<p><b>Provide measured data logs for L1, L25, and L50 sound levels (A-weighted noise levels exceeded 1 percent, 25 percent, and 50 percent of the time, respectively).</b></p> <p>The data for L1, L25, and L50 sound levels were not provided. These data are needed to define how the noise environment changes over time and assess significant impacts. The L25 level is also the parameter used for assessing construction noise impacts under the San Diego County noise ordinance.</p>
80	4.12.4.2, Question 4.12(a), Page 4.12-13	<p><b>Provide noise modeling details, including results, locations of modeled noise levels, and construction equipment included in the modeling.</b></p> <p>The PEA references the Federal Transit Administration construction noise modeling method, but lacks sufficient detail on how the noise modeling was conducted for this project and how noise levels were predicted for various sensitive receptors. This information is needed to verify the impact analysis.</p>
<b>Recreation</b>		
81	page 4.15-8	<p><b>Provide the locations and distances that trail segments will be closed along the power line alignment. Provide the timeframe for closure of each segment. Describe how pedestrian and bicycle traffic will be managed during trail closures.</b></p> <p>The PEA states "Construction notices and temporary closures would be posted to alert the public of any construction in the area. SDG&amp;E would coordinate with the City of Chula Vista on trail closures, as needed, during construction." Additional information is needed to assess the impacts of trail closures.</p>
82	page 4.15-8	<b>Clarify whether the Hunte Parkway Trail will be closed to pedestrians and bicyclists</b>

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#	PEA Section, Page #	Data Need
		<p><b>during construction of the substation. If temporary trail closure or a pedestrian detour is proposed, define the length of time that the trail will be closed.</b></p> <p>The PEA describes impacts to Hunte Parkway Trail associated with construction noise and dust. It is not clear whether the trail will also be closed and pedestrian traffic will be rerouted for a period of time.</p>
<b>Transportation and Traffic</b>		
83	4.16.4.1, Question 4.16(a), Page 4.16-9	<p><b>Please provide the traffic control plan referenced in the PEA or describe what will be included in the traffic control plan and how implementation of the plan will avoid significant impacts.</b></p> <p>The PEA states that SDG&amp;E will draft and implement a traffic control plan but does not describe what would be contained in the plan or how implementation of the plan would avoid significant impacts.</p>
84	4.16.4.1, Question 4.16(a), Page 4.16-10	<p><b>Clarify whether trenching would take place in public streets. Describe whether lane or road closures would be necessary, and the extent of those closures, to facilitate trenching in public streets.</b></p> <p>The PEA states that trenching would not occur within public streets. The PEA then says that no more than 500 feet of trench would be left open on the public street at any one time.</p>
85	4.16.4.1, Question 4.16(c), Page 4.16-13	<p><b>Discuss whether any project components may trigger FAA regulations.</b></p> <p>The PEA does not state if any structures would trigger any FAA requirements related to tall structures.</p>
86	4.16.4.1, Question 4.16(d), (e)	<p><b>Discuss impacts related to hazards from incompatible uses of area trails and roads by construction equipment, pedestrians, and bicyclists.</b></p> <p>The PEA does not analyze potential impacts to other utility or pedestrian access roads contained within the substation improvements or utility corridor (e.g., potential for reduced access to the sewer access road maintained by the City of Chula Vista). The PEA does not discuss the potential for hazards due to construction traffic on access roads that are currently used by pedestrians and bicyclists.</p>
<b>Utilities and Service Systems</b>		
87	4.17	<p><b>Provide a map and cross-section to show the locations of all existing utility lines within the utility corridor and at the substation, including:</b></p> <ul style="list-style-type: none"> <li>a) Gas lines</li> <li>b) Potable water lines</li> <li>c) Recycled water lines and proposed connection point for substation operation (e.g., landscape maintenance)</li> <li>d) Existing power lines</li> <li>e) Cable, telephone, or other communication infrastructure (e.g., cell towers)</li> <li>f) Sewer lines</li> </ul>

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<b>Table 1: Application No. 13-09-014 Data Needs</b>		
<b>#</b>	<b>PEA Section, Page #</b>	<b>Data Need</b>
<b>Other CEQA Considerations</b>		
88	Table 6-1	<p><b>Data Need Cumulative-1: Identify additional cumulative projects and the estimated construction schedule (start and end) for each cumulative project.</b></p> <p>Table 6-1, showing planned and proposed projects in the proposed project vicinity, does not include a number of projects that were discussed during the site visit on October 14, including:</p> <ul style="list-style-type: none"> <li>a) SDCWA's pipeline maintenance project that is currently under construction adjacent to the proposed power line</li> <li>b) The school development that is proposed at the Hunte Parkway staging area</li> <li>c) The University Framework Committees planned development</li> <li>d) Any other projects that SDG&amp;E is aware of in the vicinity of the project that were not listed in Table 6-1 of the PEA.</li> </ul>