Energy Division Deficiency Letter 01-SDGE Response
A.17-06-029 SDG&E Tie Line 674A Reconfiguration and TL 666D Removal Project
Date Submitted: July 26, 2017
Date Responded: August 28, 2017

Section/ Q#	DR Description	SDG&E Response
Chapter 1 – PEA Summary		
1-1	Provide more detailed background and SDG&E's response to the City of Del Mar San Dieguito Lagoon Committee concerns about topping poles along San Dieguito Drive instead of pole removal and undergrounding of all transmission and distribution lines.	The California Environmental Quality Act (CEQA) does not require mitigation of existing conditions when a significant impact resulting from the project at issue has not been identified. As concluded in Chapter 4 – Environmental Impact Assessment and summarized in Chapter 5 – Detailed Discussion of Significant Impacts of the Proponent's Environmental Assessment (PEA), the Proposed Project will not result in any significant impacts. Further, the costs associated with additional undergrounding would be distributed amongst rate payers, resulting in an unnecessary additional burden to the public for a local benefit. The Proposed Project, as defined in Chapter 3 – Project Description of the PEA was specifically designed to fully meet the Proposed Project's purpose and need (i.e., removing TL666D from the lagoons and other environmentally sensitive areas to eliminate ongoing maintenance in these areas and to mitigate for existing North American Electric Reliability Corporation [NERC] violations) as described in Chapter 2 – Project Purpose and Need of the PEA. As a result, an alternative that involves undergrounding beyond the scope of the Proposed Project and its purpose and need has not been developed. SDG&E met with both the City of Del Mar (City) and the San Dieguito Lagoon Committee to discuss the Proposed Project. While both groups provided support for the Proposed Project, they both indicated they would like to see additional undergrounding of existing lines in the area. SDG&E informed them that any additional undergrounding outside of what had been described (and included in the PEA) was not in SDG&E's Proposed Project scope as we did not have a legitimate reason (CEQA or NERC violation) that was driving any additional efforts to underground. SDG&E informed both groups that a support letter for the Proposed Project would be appreciated and they could include in their

Section/ Q#	DR Description	SDG&E Response
		letter any additional comments in their letter to the CPUC. To be clear, at no time did SDG&E indicate that additional undergrounding could occur as a result of this project. SDG&E also told the City they would meet with the companies currently attached to its poles to have them relocate their lines so the poles can be removed as opposed to topped. SDG&E also informed the City that SDG&E could not guarantee pole removal would be required for this project.
Chapter 2 – Project Purpose and Need		
2.1-1	Provide copies of required permits and conditions from the California Coastal Commission, US Army Corps of Engineers, California State Parks, Torrey Pines State Natural Reserve, and the other additional agencies with jurisdiction over wetlands and waterways.	A selection of previous approvals and conditions associated with the ongoing operation and maintenance of TL666D have been included in Attachment A: Previous Approvals and Conditions.
Chapter 3 – Project Description		
3.4-1	Provide GIS layers of Proposed Project preliminary engineering, including all components, work areas, storage areas, access roads, areas where special construction methods may need to be employed, areas of vegetation removal, areas to be graded etc. If there is a reason for the GIS data to remain confidential, please explain why.	The geographic information system (GIS) data for the Proposed Project, including the existing and proposed overhead and underground alignments, overhead and underground structures, temporary workspaces, access roads, and guard structure locations will be provided electronically under separate cover. The data is not required to be kept confidential.

Energy Division Deficiency Letter 01-SDGE Response
A.17-06-029 SDG&E Tie Line 674A Reconfiguration and TL 666D Removal Project
Date Submitted: July 26, 2017
Date Responded: August 28, 2017

Section/ Q#	DR Description	SDG&E Response
3.5.4-1	Provide a larger scale map of the Del Mar Substation including the plan and profile views showing existing and proposed equipment (including poles and lines) within the substation fenced area and the area surrounding the fenced substation site.	As described in Section 3.0.0 TL674A Reconfiguration of the PEA, the underground portion of the TL674A reconfiguration will terminate at the position vacated by TL666D. This process will require the upgrade and configuration of relay equipment within the existing control shelter. The installation, removal, or modification to exterior equipment is not anticipated. A map detailing the TL674A reconfiguration and TL666D removal in the vicinity of Del Mar Substation has been included as Attachment B: Detailed Del Mar Substation Map. Existing and proposed plan and profile views of the substation have not been included because work at Del Mar Substation will be limited to the upgrade and configuration of equipment within the existing control shelter.
3.7.1.1-1	Consider and provide descriptions and locations of additional alternative staging yards that would allow SDG&E site control. In addition, please provide any correspondence or notification to property owners of SDG&E's desire or intent to obtain agreement from these owners to use their property.	As described in Section 3.5.0 Temporary Work Areas of the PEA, SDG&E has identified four preliminary staging areas/fly yards for use during construction. Of the four sites, three (i.e., near the Del Mar Fairgrounds, within Del Mar Heights School, and within the parking lot for the Torrey Pines State Beach) are located within public use or previously developed areas. As a result, it is unlikely that the sites will become unavailable. The final site, located near the intersection of San Dieguito Road and El Camino Real, has been historically used as a parking lot and pumpkin patch/fruit stand. As a result, the likelihood of this site being developed and becoming unavailable is generally low. Nevertheless, SDG&E is initiating correspondence with the appropriate landowners to express the interest in utilizing these sites during construction. At this time, SDG&E has not identified alternative staging areas/fly yards.

Section/ Q#	DR Description	SDG&E Response
3.7.1.4-1	The maps have a drop zone designation in the legend, but the 16 drop zones do not appear to be shown on the maps in the specific color per the Legend. Identify these drop zones on the Attachment 3-A maps.	The drop zones, depicted as polygons on Attachment 3-A: Detailed Project Components Map of the PEA, are difficult to see because of their relatively small size (e.g., between 10 feet by 10 feet and 16 feet by 16 feet). In order to make these locations more visible, a revised version of the Detailed Project Components Map has been included as Attachment C: Revised Project Components Map with these locations represented by more visible point symbols.
3.7.1.4-2	Identify which proposed poles/towers would be removed and/or installed using a helicopter.	Helicopters will be used to remove Poles 29 through 34, 71 through 76, and 82 through 91 from service. Additional helicopter use may occur to avoid potential impacts to environmental resources or where access becomes limited.
3.7.1.4-3	If different types of helicopters are to be used, please describe each type.	Helicopters used to support the Proposed Project could include a Bell Huey UH-1H, Bell Type Jet Ranger, a Kaman K-Max K-1200, or similar models.
3.7.1.4-4	Describe flight paths, payloads, hours of operation for known locations and work types.	As described in Section 3.5.0 Temporary Work Areas of the PEA, helicopter flights will generally be limited to SDG&E's existing right-of-way (ROW), to the greatest extent practical. In instances where helicopters must depart the ROW, they will take the most direct and feasible path between the ROW and supporting staging area/fly yard. The most direct and feasible path between the ROW and helicopter drop zones will also be utilized. Anticipated payloads include poles, power line hardware, power line conductor, tools and additional construction materials, and construction personnel. As described in Section 4.12, Noise, of the PEA, construction will typically occur during normal work hours from Monday through Saturday. These hours will typically range between 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. and 7:00 p.m. on Saturdays. In limited circumstances, construction may be required outside of these hours. As described in Section 3.5.5, Methods, of the PEA, helicopters may be used to assist with the removal and

Section/ Q#	DR Description	SDG&E Response
		installation of conductors and associated hardware, pole topping, and pole removal.
Chapter 4 – Environmental Impact Assessment		
5.4-1	Provide a copy of any wetland delineation and supporting documentation including GIS data of wetland features. It should not be marked confidential.	The results of all wetland studies conducted for the Proposed Project have been included in the Proposed Project's Biological Technical Report (BTR). This report will be submitted electronically under separate cover. The resulting GIS data will be included as part of the GIS data package submitted in response to Question 3.4-1. The data is not required to be kept confidential.
5.4-2	Provide a copy of applicable special status surveys for wildlife, botanical, and aquatic species and any GIS data documenting locations of special status species. It should not be marked confidential.	All applicable special-status surveys for wildlife, botanical, and aquatic species conducted for the Proposed Project have been included in the Proposed Project's BTR. As described previously, this report will be submitted electronically under separate cover. The resulting GIS data will be included as part of the GIS data package submitted in response to Question 3.4-1. The data is not required to be kept confidential.
5.4-3	Submit a copy of the Proposed Project Biological Technical Report (BTR) as referenced in the PEA Biology Section 4.4.	As described previously, the Proposed Project's BTR will be submitted electronically under separate cover.
5.4-4	APM Bio – 06 –The environmental team will want to review the Nesting Bird Management Plan during the CPUC CEQA document preparation. Indicate when you plan to draft the Plan and whether there will be an opportunity for the CPUC/resources agencies to provide review and comments on the Plan during the CEQA preparation.	The construction schedule that has been provided in Chapter 3 – Project Description of the PEA has been devised to avoid construction within and adjacent to the lagoons and other environmentally sensitive areas during the nesting bird season. SDG&E will prepare and submit a Nesting Bird Management Plan to the California Public Utilities Commission 30 days prior to the start of construction.

Section/ Q#	DR Description	SDG&E Response
5.5-1	Provide a copy of the Cultural Resources Technical Report (CTR) for the proposed project that was prepared by AECOM dated May 2017. These documents should not be marked confidential pursuant to Section 583. However, we recognize these documents are confidential under other laws and will be treated as such by the CPUC and any contracted consultant.	A version of the Proposed Project's Cultural Resources Technical Report (CTR), with all confidential information removed, will be provided electronically under separate cover. Upon contracting a cultural resources consultant, SDG&E will submit the complete, confidential version of the CTR to the appropriate Cultural Resource Specialist.
5.5-2	Provide a copy of the Paleontological Technical Study prepared by Paleo Solutions, dated March 2017.	A version of the Proposed Project's Paleontological Technical Study, with all confidential information removed, will be provided electronically under separate cover. Upon contracting a cultural resources consultant, SDG&E will submit the complete, confidential version of the Paleontological Technical Study to the appropriate Cultural Resource Specialist.
5.5-3	If separate from the above reports, please provide a copy of the survey results of land under jurisdiction of the California Department of Parks and Recreation (DPR) that was conducted on October 20 – 21, 2016 under the California DPR 412A permit number 16-30.	The Proposed Project's CTR includes the survey results of land under the jurisdiction of the California Department of Parks and Recreation. As described previously in response to Question 5.5-1, this report will be provided electronically under separate cover.
5.5-4	Table 4.5-1 Cultural Resources within Proposed Project Study Area indicates that there are four sites that will be impacted by the Proposed Project and that they may be eligible for CRHR. However, the table also indicates that a testing program is not feasible or safe. Indicate how you have or will demonstrate the level of mitigation applied will satisfy the requirements of CEQA or comply with the outcome of *Madera Oversight Coalition v. County of Madera*, which requires applicants to provide substantial evidence that either known sites that have not been evaluated for their eligibility can be avoided or, if they cannot be avoided, they must be evaluated for their eligibility for listing in the	A summary of the planned construction activities in these four locations and a discussion of the planned testing approach and/or avoidance of resources at each location are provided in Attachment D: Cultural Resource Testing Summary.

Section/ Q#	DR Description	SDG&E Response
	NRHP/CRHR so that the results can be included in the EIR analysis.	
5.9-1	Provide the GIS data of all parcels within 300 feet of the Proposed Project with the following data: APN numbers, mailing addresses, and parcel's physical address.	GIS data indicating the parcels within 300 feet of the Proposed Project will be included as part of the GIS data package submitted in response to Question 3.4-1.
Chapter 5- Detailed Discussion of Significant Impacts		
6.2-1	Provide an additional alternative that encompasses the proposed project configuration, but in addition would include all lines undergrounded along San Dieguito Drive rather than just topping poles as proposed in this area. The alternative should be described and assessed similar to the existing PEA alternatives along with a comparison to the other alternatives and conclusions.	CEQA does not require mitigation of existing conditions when a significant impact resulting from the project at issue has not been identified. As concluded in Chapter 4 – Environmental Impact Assessment and summarized in Chapter 5 – Detailed Discussion of Significant Impacts of the PEA, the Proposed Project will not result in any significant impacts. Further, the costs associated with additional undergrounding would be distributed amongst rate payers, resulting in an unnecessary additional burden to the public for a local benefit. The Proposed Project, as defined in Chapter 3 – Project Description of the PEA was specifically designed to fully meet the Proposed Project's purpose and need (i.e., removing TL666D from the lagoons and other environmentally sensitive areas to eliminate ongoing maintenance in these areas and to mitigate for existing NERC violations) as described in Chapter 2 – Project Purpose and Need of the PEA. As a result, an alternative that involves undergrounding beyond the scope of the Proposed Project and its purpose and need , and that mitigates for existing conditions, is not required and has not been identified.

ATTACHMENT A: PREVIOUS APPROVALS AND CONDITIONS

ATTACHMENT B: DETAILED DEL MAR SUBSTATION MAP

ATTACHMENT C: REVISED PROJECT COMPONENTS MAP

ATTACHMENT D: CULTURAL RESOURCE TESTING SUMMARY

ATTACHMENT D: CULTURAL RESOURCE TESTING SUMMARY

Table 4.5-1 Cultural Resources within Proposed Project Study Area from Section 4.5 Cultural, Paleontological, and Tribal Resources of the Proponent's Environmental Assessment (PEA) indicates that there are four sites that fall within the boundaries of Proposed Project temporary work areas that may be eligible for listing with the California Register of Historic Resources (CRHR). Table 4.5-1 Cultural Resources within Proposed Project Study Area of the PEA concludes that implementing a testing program is not feasible or safe at these four locations. A summary of the planned construction activities in these four locations and a discussion of the planned testing approach and/or avoidance of resources at each location are provided in the subsections that follow.

CA-SDI-191

Ground disturbance within the boundary of this site is anticipated during the installation of new 69 kilovolt (kV) duct banks and the installation of a new 69 kV splice vault. Additional ground disturbance may be required for the temporary installation and removal of a guard structure. Ground disturbance is not anticipated during the use of Stringing Site 32.

The site is located in an active substation with numerous buried power lines (e.g., TL667 TL610). Testing the site would be unsafe due to the presence of these existing, active underground power lines. It is assumed that this site lacks integrity in areas where ground disturbance will occur due to the previous construction associated with Del Mar Substation, access roads, and surrounding residential and commercial development. Additionally, during potholing conducted in 2014 by Petra Resource Management, no subsurface component or site remnants were identified within the southern portion of the mapped boundary (Foglia 2014). A portion of the site was tested in 1959 by Warren and Thompson and the resulting report indicates that CA-SDI-191 is further southeast from the currently mapped boundaries, placing it outside of the ground disturbance associated with the Proposed Project. The site description more closely matches this location. The shell identified during the survey conducted for the Proposed Project may be from a secondary deposit or non-cultural.

Ground disturbance associated with the proposed guard structure could be avoided by substituting the temporary pole for staged construction equipment, as described in Section 3.5.0 Temporary Work Areas of the PEA. If required, approximately four to five shovel test pits could be used to test the site in the vicinity of the proposed 69 kV splice vault. This vault location is approximately 48 feet from existing underground power lines. The remainder of the planned ground disturbance is located immediately adjacent to existing underground power lines or within the fenced area of the substation where testing would not be necessary.

CA-SDI-193

Ground disturbance within the boundary of this site is anticipated during the installation of new 12 kV duct banks, the installation of a new 12 kV steel riser pole (Pole 35), and the installation and removal of a temporary wood pole (Pole 122). The installation and removal of a temporary guard structure may also be required. Ground disturbance within Stringing Site 25 is not anticipated due to the presence of existing pavement in this location.

This unknown prehistoric site was originally recorded in an unknown year and no site description was given on the site form. A subsequent update did not include any site data; therefore, the boundary is believed to unreliable. During the survey conducted for the Proposed Project, the only potential artifacts identified were shell on the lagoon. This shell was thought to be part of habitat restoration and likely not a cultural component. The remainder of the site appears to be destroyed by residential development and road construction. The area of potential ground disturbance is on a steep slope or within previously developed areas; therefore, these locations have a low potential for buried deposits. Further, testing outside of the planned ground disturbance was not recommended.

Ground disturbance associated with the proposed guard structure could be avoided by substituting the temporary pole for staged construction equipment, as described in Section 3.5.0 Temporary Work Areas of the PEA. If required, approximately two to three shovel test pits could be used to test the site in the vicinity of the proposed 12 kV duct bank and 12 kV riser pole.

CA-SDI-686

The northern tip of this site is partially located within the footprint of a proposed staging area/fly yard. Ground disturbance within this staging area/fly yard is not anticipated due to the existing topography and this location's active use as a parking lot and pumpkin patch/fruit stand.

This site has been previously tested and found to have a subsurface component and has never been formally evaluated for CRHR eligibility. During the survey conducted for the Proposed Project, the site was not relocated within the staging area/fly yard. The staging area/fly yard was heavily disturbed and graded due to the location's use as a parking lot. As a result, the site within the proposed staging area/fly yard is likely destroyed, although intact deposits may still exist.

If more than superficial ground disturbance is required in this area to prepare the staging area/fly yard for use, the portion of the site within the disturbance area could be fenced and avoided or could be tested for subsurface deposits prior to use. Cultural resource monitoring, as described in Section 3.8 Project Design Features and Ordinary Construction Restrictions of the PEA, will be conducted during the setup or initial use at this staging area/fly yard to reduce the potential for impacts to cultural resources.

CA-SDI-16653

Potential ground disturbance within this site will be limited to the removal of two existing 69 kV wood poles (Pole 79 and Pole 80). The proposed method for pole removal involves limited ground disturbance associated with the removal of the pole base. These poles will be accessed on foot using existing paths and will not require ground disturbance. Activities at Stringing Site 17 and Stringing Site 18 will be limited to existing pavement; therefore, no ground disturbance will be required in these locations.

This previously recorded site is a large habitation site situated on sandstone terraces, low hills, and slopes north of Carmel Valley Road. The site was combined from multiple site numbers in 1999. As a result, the site boundary now encompasses a large area. Portions of the site were

revisited during the survey conducted for the Proposed Project. Most of the site has been heavily developed or graded, and the majority of the site is within areas developed for residential use. The area in the vicinity of Pole 79 and Pole 80 is mostly undeveloped but still disturbed.

Testing where potential disturbance may occur (e.g., immediately surrounding the poles) is not feasible due to safety concerns (e.g., the pole falling over and the presence of energized conductors). It has also been assumed that the area directly around the pole was disturbed during the installation of the pole. If required, ground disturbance at these two poles could be avoided by cutting the pole near ground level, leaving the base of the pole in the ground. If ground disturbance cannot be avoided, cultural resource monitoring, as described in Section 3.8 Project Design Features and Ordinary Construction Restrictions of the PEA, will be conducted during the pole removal activities to reduce the potential for impacts to cultural resources.