



ecology and environment, inc.

# Memorandum

To: Stacie Atkinson, Regulatory Case Administrator  
San Diego Gas and Electric Company (SDG&E)

From: Michael Jacinto, Interim Project Manager  
Ecology and Environment, Inc. (E&E)

CC: John E. Forsythe, Project Manager, Energy Division,  
California Public Utilities Commission (CPUC)

Date: May 21, 2018

Re: TL 674A Reconfiguration and TL 666D Removal Project  
Request to verify and submit survey and GIS data

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Upon further review of SDG&E's application (A.17-06-029) and PEA, as well as Deficiency Letter No. 1 (August 28, 2017); Data Requests No. 1 (November 9, 2017) and No. 2 (December 21, 2017), in reference to the proposed TL674A Reconfiguration and TL666D Removal Project, the California Public Utilities Commission's Energy Division CEQA Unit requests the applicant clarify and if necessary provide the additional information enumerated below:

- 1. Please verify whether modifications and updates to survey data made in 2014 are incorporated in the 2013 baseline survey data cited in Biological Resources Report's assessment of jurisdictional waters. Moreover, please confirm whether subsequent survey data has been collected and is available for a 2016-2017 timeframe. If available, please provide the survey report.**

The PEA Biological Resources Report describes a 2016 or 2017 jurisdictional waters assessment (document date unclear, survey conducted September-October 2016) within the BRR, conducted by an AECOM wetland ecologist. This jurisdictional waters assessment involves a preliminary review of results from a 2013 jurisdictional waters assessment conducted by RECON. The survey report is described as included in the Biological Technical Report (BTR).

BTR Chapter 2.2 provides further details of the 2016-2017 assessment, but also notes the 2013 assessment data was "modified and updated as needed to reflect current conditions in the BSA." BTR Chapter 3.3 indicates RECON's data is from 2014. BTR Appendix C references 2013 data from in the RECON report on the 2014 SDG&E Aquatic Resources for the Reconfigure Tie-Line 674A at Del Mar and RFS TL666D. Appendix C does not contain any 2016-2017 survey data. Please clarify and provide the following information:

- a. The RECON jurisdictional waters assessment references 2013 data in the BTR, updated in 2014, but refers exclusively to the 2013 survey (i.e., it appears no additional assessment was conducted in 2014). Please verify the accuracy of the reference and provide any additional assessment data conducted after 2013, if available.
  - b. Please provide associated data (maps, GIS, etc.) from the AECOM 2016-2017 jurisdictional waters assessment described in the BTR.
  - c. Please clarify whether the source of previously submitted jurisdictional waters assessment GIS data is associated with the RECON aquatic survey or the AECOM aquatic survey and submit updated 2016-2017 survey data if available.
- 2. Please provide a letter report or biological survey report for the 2017 protocol-level wandering skipper surveys described in the PEA. Please include with this submittal a GIS package containing the 2017 survey result data.**
- a. PEA page 4.4-8 states additional wandering skipper protocol surveys were conducted in 2017. BTR pp. 2-3 and 2-7 state SDG&E will submit a letter report detailing additional wandering skipper survey efforts upon completion of 2017 surveys. Appendix E contains a survey report and figures based solely on wandering skipper surveys conducted by RECON in 2014.
  - b. BTR Figures 3-9a through 3-9m appear to be composite figures that feature RECON 2014 survey results as well as results from protocol-level wandering skipper surveys conducted in 2017, though no 2017 survey letter is attached, nor is 2017 survey data described in the BTR beyond its reference in these figures.
  - c. Please verify whether the 2017 survey of wandering skipper is complete, and provide survey results and associated GIS data to E&E.
- 3. Please clarify whether a GIS layer of all Holland-type natural communities – including disturbed and non-native communities – is available. If this data set does not exist, could it be easily compiled and submitted to E&E?**
- a. Data submittal should reflect the PEA-defined buffer dimensions of (i) 150-feet on both sides of centerline for linear features and (ii) 100-feet around nonlinear features, as determined during 2016-2017 Natural Community Mapping efforts.

Please respond to or contact Michael Jacinto at [mjacinto@ene.com](mailto:mjacinto@ene.com) within 10 business days if you require clarification of any item in this request. Please also copy responses and submittals to Aileen Cole, project biologist, at [acole@ene.com](mailto:acole@ene.com).