

SDG&E TL 6975 San Marcos to Escondido Project (A.17-11-010)
Energy Division Deficiency Letter #1 December 15, 2017
SDG&E Response #1 January 12, 2018

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RESPONSE OVERVIEW

On December 15, 2017, the CPUC deemed the application and PEA for the TL 6975 San Marcos to Escondido Project (A.17-11-010) incomplete. The Energy Division has required additional data to prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project, in accordance with the requirements of CEQA.

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Request No.	DATA REQUEST	SDG&E RESPONSE
<i>Chapter 1 PEA Summary</i>		
1	<p>The PEA Summary shall include any areas of controversy, any major issues to be resolved, and description of public outreach efforts. Under Section 1.7 SDG&E briefly indicates agency coordination efforts with San Diego County, City of Carlsbad, City of Escondido, City of San Marcos, and City of Vista.</p> <p>Please provide a summary of meeting discussions with the cities in order to understand any issues that have been addressed or need to be addressed related to this project.</p>	<p>Public outreach efforts have included meetings and communications with the County of San Diego, City of Carlsbad, City of Escondido, City of San Marcos, City of Vista, as well as the Native American Tribal Notification. Project information was sent to all customers within 300' of the Proposed Project alignment as part of the initial filing to obtain feedback on the Proposed Project and alternatives. SDG&E continues to brief potentially impacted customers including home owners' associations and schools. Outreach will be ongoing throughout the permitting and construction phases of the project.</p> <p>In meetings and discussions with the relevant jurisdictions identified above, SDG&E has identified and discussed issues related to aesthetics, environmental impacts, underground alternatives, design and coordination issues with traffic patterns, accessibility to properties during construction, pole locations, ADA compliance, development plans, identifying communities that need additional outreach, Joint Use Agreements (JUA), and construction and visual impacts on public view sheds along the proposed route.</p> <p>Based on our meetings with the local jurisdiction and stakeholders, SDG&E does not feel there are any major issues to be resolved.</p>
<i>Chapter 3.4 Proposed Project</i>		

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2	Per this PEA checklist section, please provide the GIS data layers for the proposed project preliminary engineering including estimated locations of all physical components of the proposed project as well as those related to construction. For physical components, this could include but is not limited to the existing components as well as the proposed pole locations, transmission lines, substations, etc. For elements related to construction include: proposed or likely lay down areas, work areas at pole sites, pull and tension sites, access roads, areas where special construction methods may need to be employed, areas where vegetation removal may occur, areas to be graded, etc.	Please see <u>Attachment 1 - TL6975 Shapefiles</u> for GIS data including the following information: Project Components: <ul style="list-style-type: none"> • Structures (Existing and Proposed) • Project Alignment Centerline • Existing Access Roads • New Access Roads • Distribution Trench • Stringing Sites • Permanent Work Area or Grading Impacts • Staging Yards • Existing Substations
3	Please provide the capacity increase in megawatts (MW). If the proposed project does not increase capacity, state that.	The Proposed Project does not result in a capacity increase.
4	Please provide a “typical” plan and profile views of the existing substations that are included in the Proposed Project.	Please see <u>Attachment 2A – SM Sub Plan Profile</u> for the San Marcos Substation Typical Plan and Profile views. Please also see <u>Attachment 2B – ES Sub Plan Profile</u> . The Escondido Substation drawing only has a Typical Plan view, as the substation is not visible from the public road (it is within the SDG&E Operations Center). The details from the drawings have been removed as they show critical infrastructure.
5	The proposed project anticipates the need for increased ROW to provide a 20-foot easement and accommodate new structures. Please describe how additional ROW would be acquired.	The process for acquiring additional ROW is to appraise the land and prepare an offer package for the underlying land owner to acquire the rights. In certain portions along the proposed route, SDG&E easements do not specify a width. SDG&E interprets that the existing cross-arms establish the easement boundaries. Other locations along the project route have 6-12’ easements. To accommodate the larger new poles along the proposed route, SDG&E would pursue amendments to the existing easements in these locations to avoid overburdening SDG&E’s existing easements. The proposed

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		acquisitions would add enough right-of-way (approximately 5-10' at most) to accommodate the wider cross-arms while clarifying SDG&E's easement rights.
6	List the properties likely to require acquisition.	<p>Based on SDG&E's assessment of the preliminary design, it appears that the following are the properties in which SDG&E would pursue additional ROW:</p> <p>221-021-46-00</p> <p>221-021-48-00</p> <p>221-021-52-00</p> <p>221-024-21-00</p> <p>221-032-48-00</p> <p>221-611-02-00</p> <p>221-611-04-00</p> <p>221-611-13-00</p> <p>221-661-18-00</p> <p>221-890-35-00</p> <p>221-890-36-00</p> <p>221-890-37-00</p> <p>221-890-38-00</p>
7	In addition to providing GIS information for each type of vegetation removal, please describe how each type of vegetation removal would be accomplished.	The amount of required vegetation removal will depend on the work scope (i.e., work pad creation, re-establishment of access roads). Vegetation will be cleared as needed by mowing, trimming, and removal with various types of equipment. After project staging yards have been confirmed, certain vegetation removal at these sites may also be required. Along the Proposed Project alignment, G.O.95 Rule 35 minimum clearances will need to be followed. Where the Proposed Project is within the Fire Threat Zone and/or State Responsibility Areas, Public Resources Codes 4292 and 4293 will need to

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		be followed. Please see Attachment 1 - TL6975 Shapefiles for GIS data files that include vegetation and types of work areas.
8	For all trenching activities proposed, please provide the total approximate cubic yardage of material to be removed from the trench, the amount to be used as backfill and the amount subsequently to be removed/disposed of off-site.	Approximately 104 total cubic yards of material will be removed from all trenches and will all be hauled away and disposed of off-site. All trenches will be backfilled with concrete.
Chapter 5.1 Aesthetics		
9	The PEA checklist requires visual simulations of prominent public view locations. Figure 4.1-2 (photos of viewpoint locations) and Figure 4.1-3 (photos of existing facilities and vicinity) are not included in Section 4.1. In addition, there are no visual simulations of the proposed project in section 4.1 or the appendices. Please provide these figures and simulations to the CPUC.	Please see Attachment 3A – Figure 4.1-2 PhotoPoints Mapbook for photos of view point locations, Attachment 3B – Figure 4.1-3 Existing Facilities for photos of existing facilities and vicinity, and Attachment 3C SAN MARCOS ESCONDIDO VISUAL SIMS for view simulations from 5 key view points along the Proposed Project alignment.
Chapter 5.4 Biological Resources		
10	The PEA checklist requires GIS data of wetland features as well as any GIS data documenting locations of special status species. Provide GIS data of wetland features. It should not be marked confidential.	Please see Attachment 1 - TL6975 Shapefiles for GIS data including wetland features and special status species.
11	Provide any GIS data documenting locations of special status species. It should not be marked confidential.	Please see Attachment 1 - TL6975 Shapefiles for GIS data including wetland features and special status species.
Chapter 5.5 Cultural Resources		
12	The PEA checklist requires a copy of all letters and documentation of Native American consultation. Per PEA section 4.5.2.2 please provide the NAHC 3/22/2017 response to	Please see Attachment 4 – NA Contact Program for a copy of letters and documentation of Native American consultation.

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	SDG&E, letters sent to all listed tribes on 3/30/2017, and the responses received from the three tribal groups.	
Chapter 5.6 Geology		
13	The PEA checklist requires a copy of the geotechnical investigation, if completed. Please provide a copy of the geotechnical study prepared by Geocon (2017) as indicated by PEA on page 4.6-13.	Please see <u>Attachment 5 – Geotechnical Investigation</u> for the Geotechnical Investigation.
Chapter 5.9 Land Use and Planning		
14	Please 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.	<p>Please see <u>Attachment 1 - TL6975 Shapefiles</u> for the GIS data including all parcels within 300 feet of the Proposed Project with the following data:</p> <ul style="list-style-type: none"> • APN number • Mailing address • Parcel physical address

List of Attachments	
1 – TL6975 Shapefiles	3B – Figure 4.1-3 Existing_Facilities
2A – SM Sub Plan Profile	3C – SAN MARCOS ESCONDIDO VISUAL SIMS
2B – ES Sub Plan Profile	4 – NA Contact Program
3A – Figure 4.1-2 PhotoPoints_Mapbook	5 – Geotechnical Investigation