SDG&E TL 6975 San Marcos to Escondido Project (A.17-11-010)
Energy Division Deficiency Letter #2 Date January 26, 2018
SDG&E Response #2 February 28, 2018

REPORT 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 Project, in accordance with the requirements of CEQA.

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1	Per the PEA checklist – Analysis of the reason why attainment of these objectives is necessary or desirable. Such analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives which will aid any appropriate CEQA alternatives screening process. • Provide the updated system data relevant to the project area transmission system including the most recent ten-year load forecasts	Please see Attachment 1 for the most recent ten-year load forecasts.
2	Per the PEA checklist – Describe if the Proposed Project is located within an existing property owned by the Applicant, traverses existing rights of way (ROW) or requires new ROW. Give the approximate area of the property or the length of the project that is in an existing ROW or which requires new ROWs.	Please see Attachment 2 for updated Appendix 3 figures that distinguish between the proposed new ROW and existing ROW.

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	• Provide figures and GIS data showing the approximate rights-of-way (ROW). For Segment 1 – distinguish between the proposed new ROW and existing ROW. The preferred format for revised figures would be to incorporate the ROW layer onto the Appendix 3 figures	
3	Per the PEA checklist - Describe the local system to which the Proposed Project relates; include all relevant information about substations, transmission lines and distribution circuits. ***Note: regional system maps would remain confidential for security reasons.*** • Provide schematic diagrams showing the layouts and profile (horizontal) views of the existing San Marcos and Escondido substations. The CPUC also requests the same diagrams showing the proposed project (this request is repeated under Section 3.5.4)	Per response #4 (Attachment 2) to Deficiency Letter #1 (January 15, 2018), typical plan and profile views of the existing substations and proposed alterations to the substations have already been provided, and proposed alterations have been clarified (circled in red) on the drawings provided in Attachment 3 to the current Response #2.

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4	Per the PEA checklist - Describe the local system to which the Proposed Project relates; include all relevant information about substations, transmission lines and distribution circuits. ***Note: regional system maps would remain confidential for security reasons.*** • ***May be delivered as confidential*** – Provide the power flow plots for the existing system, including the San Marcos and Escondido substations	Please see Attachment 4 for the power flow plots for the existing system, including the San Marcos and Escondido Substations.
5	Per the PEA checklist - Describe what would occur to other lines and utilities that may be collocated on the poles to be replaced (e.g., distribution, communication, etc.). • Section 3.7.1.3 notes that approximately 360 linear feet of underground conduit would be installed from new poles to intercept locations along existing conduit packages. How deep would trenches be for installation of the underground conduit?	Trenches for the installation of underground conduit would be approximately 4 feet deep.
6	Per the PEA checklist - Provide "typical" Plan and Profile views of	Please refer to response #3 above.

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	the proposed substation and the existing substation if applicable. • Provide schematic diagrams showing the layout and profile (horizontal) views for the Proposed Project San Marcos and Escondido substations. Layout diagrams of the existing substations was provided in response to Deficiency Report #1, provide the same layout with the Proposed Project changes.	
7	Per the PEA checklist - Describe the ROW location, ownership, and width. Would existing ROW be used or would new ROW be required? If new ROW is required, describe how it would be acquired and approximately how much would be required (length and width). • As requested under Section 3.1 – provide GIS data for the project alignment ROW. Include both existing and proposed ROW.	Please refer to response #2 above.

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8	Per the PEA checklist - Describe any grading activities and/or slope stabilization issues. • Describe the likely extent of grading activities and other ground disturbing activities for each of the proposed staging areas.	Minor site work may be required for the proposed staging yard locations. This could potentially include clearing, grubbing, leveling, and import of base material. No major grading is proposed for any of the staging yard locations. Ground disturbing activities would include the installation of chain link fencing on the perimeter and installation of decomposed granite, if necessary, as determined by the construction contractor.
9	Per the PEA checklist - Identify approximate location of all access roads (by type) in the GIS database. • The alignments of spur roads are not apparent in Appendix 3-A (four new spur roads totaling 225 linear feet, each 14 feet wide). Provide the alignment information in both GIS and on updated Appendix 3 figures.	Please see Attachment 2 for updated Appendix 3-A figures that show the alignments of the four new spur roads.
10	Per the PEA checklist - Identify which proposed poles/towers would be removed and/or installed using a helicopter. • Identify which poles are proposed for removal or installations using a helicopter.	At this time, SDG&E anticipates that all poles and towers where work is proposed would be accessible with truck and/or crane. However, once the construction contractor selected for the Proposed Project conducts a constructability review, there may be the need to install structures via helicopter. Locations where helicopter may be necessary include: • Location 52 to location 54.3 • Location 63 to location 64 to location 65

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11	Per the PEA checklist - For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal. • Identify which areas will require tree removal. Provide data in GIS format.	At this time, no tree removal is anticipated for the Proposed Project because almost the entire alignment is within franchise or an existing transmission corridor. However, if tree removal is required as determined closer to construction of the Proposed Project, SDG&E will follow the requirements of General Order (GO)-95 related to vegetation removal. In accordance with tree and power line clearance requirements in Public Resources Code 4293, Title 14, Section 1256 of the CCR and CPUC GO 95, SDG&E will trim trees and vegetation to manage fire, electrical reliability, and safety hazards. Regular inspection, regardless of habitat type, is necessary to maintain proper line clearances.
12	Per the PEA checklist - If conductor is being replaced, how would it be removed from the site? • Describe how conductor cable would be removed from the site.	All old conductor will be removed from the pole and then the temporary work area on spare, empty reels. The conductor will be transported to the nearest staging yard where manageable conductor coil lengths will be placed in large recycling dumpsters.
13	Per the PEA checklist - Provide a list of the types of equipment expected to be used during construction of the Proposed Project as well as a brief description of the use of the equipment. • Table 3-10 of the PEA does not include a dump truck for material haul (only field crane/line truck and fork lift reference). Verify that a dump truck is not needed.	Please refer to Table 3-10 of the PEA. As indicated in this table, it is estimated that 2 dump trucks will be used during pre-construction activities. It is estimated that 1 dump truck will also be used for trenching for installation of underground cables and demobilization/right-of-way restoration and cleanup/road refreshing.
14	Per the PEA checklist - Provide a list of the types of equipment expected to be used during construction of the Proposed Project	Each dump truck has an estimated 16 cubic yard capacity for the 1-2 used per construction phase as described in response #13 above.

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	as well as a brief description of the use of the equipment. • Specify the number and/or capacity of haul trucks for importing and exporting materials.	
15	Per the PEA check - Provide a Preliminary Project Construction Schedule; include contingencies for weather, wildlife closure periods, etc. • Provide the general hours of construction.	SDG&E anticipates that it will conduct construction activities primarily within the hours specified by each jurisdiction's applicable municipal code's noise construction noise ordinance (i.e., 7 a.m. – 7 p.m.). If construction must occur outside of these hours (i.e., night work) due to traffic, safety, outages, or other constructability related issues, SDG&E will obtain noise permits from each jurisdiction as necessary.
16	Per the PEA check - Provide a Preliminary Project Construction Schedule; include contingencies for weather, wildlife closure periods, etc. • Describe the estimated frequency (number of days per year) and duration of nighttime construction.	Please refer to response #15 above. At this time, SDG&E does not have enough information regarding construction of the Proposed Project to definitively determine if nighttime work will be required as a result of traffic, safety, outages, and other constructability concerns.
17	Per the PEA checklist - If additional full time staff would be required for operation and/or maintenance, provide the number and for what purpose. • Provide an estimate on the frequency of road	Road maintenance would typically occur every other year. Conditions, such as heavy rainstorms, may require some maintenance to be conducted on an as-needed basis.

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	maintenance (i.e. annually, every xx years).	
18	Per the PEA checklist - If additional full time staff would be required for operation and/or maintenance, provide the number and for what purpose. • If necessary, provide an estimate of the frequency and duration of helicopter use during operation and maintenance activities.	The Proposed Project would be patrolled via helicopter a minimum of twice a year for routine maintenance. Additional patrols are conducted on an as needed basis, and are unpredictable (Example: Fault Patrols).
19	Per the PEA checklist - Provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided. • Provide a copy of the 2017 Revised HCP	Please see Attachment 5 for a copy of the 2017 Revised HCP.
20	Per the PEA checklist - Provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided. • Expand the description in Section 3.8.4 regarding SDG&E's parameters for	The herbicide program is managed by SDG&E's contractor Davey Tree Surgery Co. They are a fully licensed and insured vegetation control company. They receive a recommendation from a Certified Pesticide Advisor (Wilbur Ellis Co.). Based upon those specifications, they order a specific blend of herbicides, pre-emergent, and surfactant for use around SDG&E poles and steel tower legs for vegetation management control. Davey Tree Surgery Co. surveys the poles and towers notifying customers of the intent to utilize herbicides. They are trained applicators and do not apply herbicides if they are too close to water or on heavy slopes. The application method includes use of a back-pack sprayer with a rate of 1 gallon per acre. This is about 1.5 ounces per pole within a 10-foot radius. Please refer to Attachment 6 for a copy of the herbicide blend and the recommendation sheet from Wilbur Ellis.

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	herbicide use for vegetation control (e.g., notification/site posting, allowable herbicide types, application method, max quantity per acre per year, etc.).	
21	Per the PEA checklist - Within the Environmental Impact Assessment Summary, for impacts where a number of mitigation measures are available to reduce impacts, each mitigation measure should be discussed and the basis for selecting a particular mitigation measure should be stated. • For APM BIO-5, in the instance that impacts on sensitive plants are unavoidable, additional mitigation is needed to ensure that impacts to rare plants would be less than significant. Such mitigation is deferred in the APM and is not provided in the SDG&E Subregional NCCP. Please elaborate in APM BIO-5 on the following elements that would be included in the Plant Salvage Plan: what plants would most likely be	The SDG&E analysis of impacts on two special-status plants, provided in the PEA, confirmed that "impacts on Nuttall's scrub oak and wart-stemmed ceanothus, both CRPR List 1B or 2B species, would not be significant because the area of impacts on these species would not exceed 5 percent of the total area mapped within the PSA…" As indicated in the PEA, direct impacts on both of these species are small, even compared to the localized occurrences that were mapped within the Project Survey Area (PSA). The Proposed Project would impact approximately 0.7% percent of the total area mapped within the PSA for Nuttall's scrub oak, and 0.1% of the area mapped for wart-stemmed ceanothus, which is less than significant (LTS) when using the County of San Diego's significance thresholds. When these impacts are considered in context of the larger regional populations of the species occurrences in San Diego County (for wart-stemmed ceanothus) and in San Diego and coastal Southern California (for Nuttall's scrub oak), these impacts are negligible at both the regional and statewide levels. Because these impacts do not constitute significant impacts, mitigation for these impacts is not required under CEQA. As described in the PEA, SDG&E proposes to address impacts to these species through avoidance of impacts by staking/flagging, weed management within temporary work areas, the enhancement of species habitat through the NCCP, and plant salvage if impacts are unavoidable. Consistent with plant salvage provisions in the Enhancement Section 7.2.1 of the NCCP, SDG&E will perform topsoil salvage during construction and replace topsoil within temporary impact areas following construction wherever these species occur. These techniques would enhance the potential for regenerating Nuttall's scrub oak within the 0.06 acre of temporary impact areas where this species was documented. Active restoration of temporary work areas would also minimize the potential indirect impacts to remaining, adjacent occurrences of special-status populations by reducing the potential for the spread of invasive species into these areas. SDG&E has also purchased mitigation lands adjacent to the Elfin Forest, termed the Cielo Mitigation Site. Wart-stemmed ceanothus is well documented from this area, and as a result of the permanent protections put in place, SDG&E will enhance the long-term survival and protection of this NCCP-Covered Species. SDG&E has provided the following revised language to APM BIO-5 for clarity (changes in red):

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	encountered, methods for plant salvage or seed collection, how suitable planting areas would be determined, replanting methods, the need for supplemental watering and weeding, and numerical success criteria related to vegetation cover and survival success. The measure additionally should also state the duration of the post-planting monitoring effort (e.g., 5 years) and include contingency measures if annual monitoring goals are not met.	**APM BIO-5:** Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist. The flagging and/or fencing will be maintained in place for the duration of construction. Flagged and fenced areas will be avoided to the extent practicable during construction activities in that area. If impacts to Nuttall's scrub oak and wart-stemmed ceanothus are unavoidable, SDG&E will ~~coordinate with the appropriate jurisdictional agency to develop a plant salvage plan.~~ perform soil and plant salvage activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of the NCCP. These include the stockpiling of native soil in the area where Nuttall's scrub oak and wart-stemmed ceanothus occur and top soil replacement after construction. Quality assurances and success criteria milestones for the restoration area as a whole will conform to the standards provided in Enhancement Section 7.2.1 of the NCCP.
22	Per the PEA checklist - For each resource area discussion, the PEA must include the following: • A description of the physical environment in the vicinity of the project (e.g. topography, land use patterns, biological environment, etc.) – local environment (site-specific) – regional environment	A description of the physical environment and local environment can be found in the cultural resources survey report on page 13. A copy of the non-confidential cultural resources report can be found in Attachment 7. A description of the regulatory environment can be found in the cultural resource survey report on page 14 and in PEA, in section 4.5.3.1 Regulatory Setting. A copy of the non-confidential cultural resources report can be found in Attachment 7. A copy of the non-confidential cultural resources report can be found in Attachment 7. This report documents all cultural resources investigations of the Proposed Project to date. This includes a summary of the literature search, pedestrian survey, and all Native American outreach to date. Confidential appendices (A-E) to the non-confidential report will be submitted separately directly to ESA's Cultural Resource Specialist under a separate cover. This confidential submittal will include:

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	• A description of the regulatory environment/context – Federal – State – Local • Provide a description of the local or regional environment. Per the PEA checklist – In addition to an Impacts Analysis: Cultural Resources Report documenting a cultural resources investigation of the Proposed Project. This report should include a literature search, pedestrian survey, and Native American consultation. • May be delivered as confidential – Provide copies of the cultural resources reports in support of the project. The reports should include a summary of the literature search, pedestrian survey, and Native American outreach conducted.	Appendix A Cultural Resources and Project Components Map Appendix B Supplemental Archaeological Survey Reports Appendix C Records Search Results Appendix D DPR Form Updates Appendix E Native American Contact
23	Provide a description of the built environmental resources, specifically the existing project substations and the transmission lines to be rebuilt. Provide the age	A preliminary assessment shows that the San Marcos and Escondido substations may be less than 50 years old and therefore not subject to evaluation for the Proposed Project. The transmission lines may be more than 50 years old and therefore are subject to evaluation. As the built environmental resources report was not conducted during the

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	of the resources and whether they would qualify as historical resources.	initial project studies, a built environmental evaluation report is in progress and will be submitted when complete. This report is anticipated to be complete within 6 to 8 weeks and will be submitted then.
24	May be delivered as confidential - Resource P-37-033635, a historic-period road segment dating to the 1800s, has been evaluated as not eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) based on survey observations only. If the resource is to be considered not eligible then additional research and a formal evaluation of the resource are required. Alternatively, the resource may be considered eligible for the purposes of the project and mitigation measures for avoidance should be implemented. If avoidance is not feasible, provide the additional research and evaluation.	This resource will be considered eligible for the purposes of this project and will be avoided through project design. Therefore, no evaluation of this resource has been conducted at this time.
25	Per the PEA checklist - Provide a copy of the records found in the literature search. • May be delivered as confidential – Provide copies of the records found	Please refer to #22 above.

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	as part of the literature search.	
26	Per the PEA checklist - Provide a copy of all letters and documentation of Native American consultation. • May be delivered as confidential – The Sacred Lands File search results and outreach letters to Native American groups are appended to the PEA. However, this does not represent the entirety of the communication summarized in the reports. Provide copies of the call and/or meeting logs and notes, as well as any written responses by Native American groups.	Please refer to #22 above.
27	Per the PEA checklist - For each resource area discussion, the PEA must include the following: • A description of the physical environment in the vicinity of the project (e.g. topography, land use patterns, biological environment, etc.) – local environment (site-specific)	A Phase I Environmental Site Assessment has not been prepared.

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	– regional environment • A description of the regulatory environment/context – Federal – State – Local • Was a Phase I Environmental Site Assessment prepared for the acquired area? If yes, please provide.	
28	Provide a table of the standard environmental records/databases reviewed and the search distances. There's a table on page 399/677, but it doesn't seem to cover all of the records reviewed. It appears they all may have a ½-mile search radius, please confirm.	Please see Attachment 8 for a table of all the databases searched by EDR within the 0.25-mile search radius.
29	Provide a discussion of the local Certified Unified Program Agencies (CUPA) for the project area.	The Hazardous Materials Division (HMD) of the Department of Environmental Health (DEH) is the CUPA for San Diego County, and the Proposed Project Area. It is responsible for regulating facilities that: • Handle or store hazardous materials • Are part of the California Accidental Release Prevention Program • Generate or treat hazardous wastes • Generate or treat medical waste • Store at least 1,320 gallons of aboveground petroleum • Own or operate underground storage tanks

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		All businesses in the County that conduct any of the above listed activities are required to obtain a Unified Program Facility Permit through the California Environmental Reporting System (CERS). Almost all permitted facilities need to update and submit to the CERS annually. Reference: 2018. Department of Environmental Health. *Permits.* Available: https://www.sandiegocounty.gov/content/sdc/ deh/hazmat/hmd_permits.html. Accessed: February 1, 2018.
30	Per the PEA checklist - Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact. • Provide copies of the following: – The SDG&E Construction Water Sourcing Investigation Plan – SDG&E BMP Implementation Plan	Please see Attachment 9 for a copy of the SDG&E Construction Water Sourcing Investigation Plan and Attachment 10 for a copy of the SDG&E BMP Implementation Plan.
31	Will-serve letter from VWD dated October 19, 2017	Please see Attachment 11 and PEA Appendix 3-D for a copy of the VWD will-serve letter.
32	Per the PEA checklist - Describe impacts to groundwater quality including increased run-off due to construction of impermeable surfaces, etc. • Provide confirmation that operation work pads/maintenance work pads would not be paved.	No operation work pads/maintenance work pads will be paved.

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<tr><th>Request No.</th><th>DATA REQUEST</th><th>SDG&E RESPONSE</th></tr>
<tr><td>33</td><td>Per the PEA Checklist - Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact.

• Include Interstate 5 (I-5) in the description of regional access. Given the location of some of the potential staging yards identified in the Project Description, it seems possible and likely that a notable amount of construction traffic would use I-5 to access the project site. Environmental Site Assessment prepared for the acquired area? If yes, please provide.</td><td>Interstate-5 (I-5) is a designated freeway which starts in southern San Diego County, at the border with Mexico, and travels north, traversing California, Oregon, and Washington, to end at the border with Canada. In the Proposed Project Area, I-5 travels along the coast, from Encinitas to Carlsbad. The Annual Average Daily Traffic (AADT) is measured annually by Caltrans along the highway at each intersection with a local street. The below table provides 2016 AADT from the intersection of I-5 and Palomar Airport Road, the local road that intersects with the northern portion of the Proposed Project Alignment. The I-5 would provide access to the Eagle Drive #2, Carlsbad Business Park, Lionshead Avenue #5 staging yards, the western end of Segment 1, and the northern end of Segment 2 of the Proposed Project. During construction activities, the staging yards would be utilized as staging and storage areas for equipment, vehicles, construction materials, and worker vehicles. Vehicle trips generated from the travel to or from the staging yards could utilize I-5. Due to the relatively low number of vehicle trips generated by workers and equipment/material delivery, it would not significantly impact the traffic volumes on I-5.

No Phase I Environmental Site Assessment has been prepared.

Annual Average Daily Traffic on Interstate 5 in 2016
<table>
<tr><th>Roadway (Cross Street)</th><th>General Classification</th><th>Number of Lanes</th><th>Jurisdiction/ Location</th><th>Ahead AADT (South)</th><th>Behind AADT (North)</th></tr>
<tr><td>I-15 (Palomar Airport Road)</td><td>Highway</td><td>8</td><td>Caltrans</td><td>198,000</td><td>201,000</td></tr>
<tr><td colspan="6">Source: Caltrans 2016.</td></tr>
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<tr><td>34</td><td>Provide further discussion of criteria used to select the “Project Area Major Roadways” characterized in Table 4.17-2. Does this selection of roadway segments take into account the locations of potential staging yards. Environmental Site Assessment prepared for the</td><td>The Proposed Project area major roadways were selected based on their proximity to the Segments of the Proposed Project, the locations of the existing and proposed access roads, and the locations of existing and proposed staging yards. Three proposed staging yards are located along Palomar Airport Road, which turns into San Marcos Boulevard as the street continues to the east, six proposed staging yards are located along Harmony Grove Road, and one proposed staging yard is located along Interstate-15. These three major roads in Table 4.17-2 of the PEA take into account the location of proposed staging yards in relation to the location of the Proposed Project alignment. No Phase I Environmental Site Assessment has been prepared.</td></tr>
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	acquired area? If yes, please provide.	
35	Provide further explanation of methodology used to calculate LOS for roadways without published LOS values. What value was used in the vehicles-per-hour-per-lane capacity assumption. Environmental Site Assessment prepared for the acquired area? If yes, please provide	The vehicles-per-hour-per-lane capacity method was not used for the LOS calculations. To calculate LOS for roadways that did not have a published LOS available, the average daily traffic (ADT) was divided by the roadway capacity, to achieve the volume-to-capacity (v/c) value. This value was then compared to the LOS categories defined in Table 4.17-1 in the Transportation and Traffic Section of the PEA. ADT was obtained from traffic count data published by SANDAG (2013), and road capacity was derived from city planning documents. No Phase I Environmental Site Assessment has been prepared.
36	Provide an estimate of the maximum number of daily truck trips during peak construction, similar to what was done for employee trip estimates. These should not only include "deliveries of construction items and equipment" (as stated in the PEA), but also truck trips associated with importing and exporting soil, concrete pours, etc.	The Proposed Project is anticipated to result in a maximum of 14 truck trips per day during peak construction. This estimate includes overlapping of construction phases, and accounts for all facets of construction.

37	Identify which overlapping construction activities would generate the greatest number of construction worker and truck trips over the course of the 12-month construction timeframe. What would be the approximate duration of this peak of construction activity?	Overlapping construction activities that generate the peak construction day truck trips (14) include all of the following:
		• 05.2 Foundation Construction (Pier) – Segment 2
		  o 77 work days
		• 05.3 Foundation Construction (Pier) – Segment 3
		  o 11 work days
		• 06.2 Structure Installation and Assembly – Segment 2
		  o 68 work days
		• 06.3 Structure Installation and Assembly – Segment 3

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		o 18 work days • 07.1 Stringing Activities/Transfer Conductor/Sagging Activities – Segment 1 o 55 work days • 10.3 Substation Work (Escondido) below grade o 15 work days For 77 days, a max of 14 daily truck trips would occur.
38	Include a statement regarding the dispersion of construction trips across multiple construction staging areas, if this is in fact the case.	For the Proposed Project's construction air quality emissions assumptions, the air quality model (CalEEMod 2016.3.1) default distances were used to calculate worker trips (10.8 miles) and for haul truck trips (20 miles). The calculations did not account for specific distances to and from across individual staging yards, as the exact staging yards that will be used during project construction have not yet been determined and not every potential staging yard identified would be used during construction. Therefore, construction trips were not dispersed across multiple staging yards.