

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 9, 2015

Ms. Shivani Ballesteros
San Diego Gas and Electric Company
8330 Century Park Court, CP31F
San Diego, CA 92123

RE: Application Completeness – Permit to Construct for the Tie Line 649 Wood-to-Steel Replacement Project – Application No. A.15-08-006

Dear Ms. Ballesteros:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of San Diego Gas and Electric Company's (SDG&E) Application (A. 15-08-006) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) for the Tie Line 649 Wood-to-Steel Replacement 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 Tie Line 649 Wood-to-Steel Replacement Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate environmental document in a timely manner. The attached report identifies the portions of the application found to be deficient.

Information provided by SDG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A. 15-08-006. One set of responses should be sent to the Energy Division and one to our consultant Horizon Water and Environment, in both hardcopy and electronic format. We request that SDG&E respond to this report no later than November 8, 2015.

Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

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 PTC be approved.

Please direct questions related to this application to me at (415) 703-1189 or michael.zelazo@cpuc.ca.gov.

Sincerely,

Michael Zelazo, P.E.
Utilities Engineer
Infrastructure Permitting and CEQA Section
Energy Division

cc: ALJ Wildgrube
Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Tom Engels, Project Manager, Horizon Water and Environment

DEFICIENCY REPORT FOR THE SDG&E TIE LINE 649 WOOD-TO-STEEL REPLACEMENT PROJECT APPLICATION (A. 15-08-006)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company's (SDG&E) Application (A.15-08-006) and Proponent's Environmental Assessment (PEA) for a Permit to Construct the Tie Line 649 Wood-to-Steel Replacement Project. Deficiencies were identified using the CPUC PEA Checklist (November 2008). Deficiencies are presented in Table 1.

Def.#	Resource Area / Topic	Source / PEA Page	Table 1 Request	Request Date	Reply Date	Status	Notes
Deficiency Request #1 (9/10/2015)							
3.4-1	Project Description	p. 3-2	Figures 3.2 and 3.3 are inadequate to display the proposed project. Figure 3.2 is of too small of scale. Figure 3.3 is missing the O'Neil Canyon tap and does not show TL 649 going to San Ysidro Substation as discussed.	9/9/15			
3.4-2	Project Description	p. 3-2	The PEA does not provide GIS (or equivalent) data layers for the proposed project.	9/9/15			
3.7.0-1	Project Description	p. 3-14	The PEA states that "minor adjustments to the access requirements" may be necessary at the time of construction due to site condition and that "SDG&E will identify the specific locations and improvements that are required" and "complete an internal environmental review that analyzes and minimizes potential impacts to sensitive environmental resources." This section suggests that future project modifications may result in potentially significant environmental impacts. More detail needs to be provided on potential changes to the proposed project to properly evaluate potentially significant impacts.	9/9/15			
3.7.4-1	Project Description	p. 3-19	The PEA does not provide vehicle types, number of vehicles, and estimated number of trips and hours of operation for the construction crew and their equipment for pole installation and removal.	9/9/15			

**Table 1
Request**

Def.#	Resource Area / Topic	Source / PEA Page	Request	Request Date	Reply Date	Status	Notes
3.7.4-2	Project Description	p. 3-23	There is mention of the potential need for blasting during construction. According to the PEA, if blasting is deemed necessary, "The appropriate BMPs will be used before, during, and after all construction activities where necessary to prevent erosion and off-site sedimentation." These BMPs need to be included in the Project Description as APMs.	9/9/15			
3.7.6-1	Project Description	p. 3-25	The Project Description states that "if construction occurs outside of the hours allowed by the City of Vista, the City of San Diego, or the County of San Diego, SDG&E will meet and confer, or follow established practices with the appropriate jurisdictions, as needed." The statement that SDG&E "will meet and confer" is inadequate mitigation. The use of the word "or" after this statement implies that that "meet and confer" is a possible mitigation measure.	9/9/15			
3.7.7-1	Project Description	p. 3-25	The Project Description states that "removal of existing poles will occur immediately following new conductor installation unless third-party facilities are present, which may temporarily delay existing pole removal by approximately 30 to 60 days until the third party relocates its facilities." Please indicate what types of third-party facilities are anticipated, and what is meant by "relocation."	9/9/15			
3.8.0-1	Project Description	p. 3-26	The Project Description states that "road maintenance includes grading of existing access roads, installation of BMPs, spot-repair of erosion sites, and vegetation trimming, as needed." Please provide a list of BMPs that potentially would be installed.	9/9/15			
3.8.2-1	Project Description	p. 3-27	The Project Description states that "SDG&E normally utilizes one or more of 16 herbicides." Please provide a list of these herbicides and clarify whether herbicides not listed potentially might be applied. If herbicides other than the 16 mentioned might be applied, these other herbicides must be listed.	9/9/15			
3.8.4-1	Project Description	p. 3-27	The PEA does not provide an adequate discussion of the use of helicopters including any BMPs that would be employed, flight paths, payloads, and hours of operation for known locations and work types.	9/9/15			

**Table 1
Request**

Def.#	Resource Area / Topic	Source / PEA Page	Request	Request Date	Reply Date	Status	Notes
3.10-1	Project Description	p. 3-30	The Project Description states that "If additional or modified work areas or use of additional existing access roads, additional modifications to existing access roads, or use of additional or modified overland travel routes to work areas are required, SDG&E will identify the specific locations and improvements that are required, and complete an internal environmental review that analyzes and minimizes potential impacts to sensitive environmental resources." The PEA needs to either specify the potential areas of effect or explain how an "internal environmental review" will reduce any potentially significant impacts to the environment to a less-than-significant level.	9/9/15			
4.4.3-1	Biological Resources	pp. 4.4-51-52	The PEA states that the Riverside fairy shrimp and San Diego fairy shrimp (both of which are federally-listed as endangered) have "high potential to occur within the Survey Area." The PEA then states that "SDG&E will conduct protocol-level surveys prior to construction to determine the presence or absence of San Diego and/or Riverside fairy shrimp species in suitable habitat in the following locations: Main Street Staging Yard, within the access roads and proposed work areas between pole locations 1 through 78, and within the access roads and proposed work areas between pole locations 96 through 117. If surveys cannot be feasibly completed prior to construction in these locations, the Proposed Project will avoid suitable habitat for special-status fairy shrimp when soils are wet." Please note that the stated proposed avoidance measure is inadequate. If protocol-level surveys are not conducted, CPUC will assume presence of these species and appropriate mitigation measures will be proposed.	9/9/15			
4.8-1	Hazards and Hazardous Materials	p. 4.8-i	The PEA does not include a Hazardous Substance Control and Emergency Response Plan, a Health and Safety Plan, or a Worker Environmental Awareness Program	9/9/15			
4.16.4-1	Transportation and Traffic	p. 4.16-11	The PEA does not provide a preliminary description of the traffic management plan that would be implemented during construction of the proposed project.	9/9/15			
4.18.6-1	Cumulative Analysis	p. 4.18-3	The PEA does not provide a list of projects (i.e., past, present and reasonably foreseeable future projects) within the Project Area that the applicant is involved in.	9/9/15			