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November 25, 2013

Reg.12-10/A.13-09-014
SDG&E Salt Creek PTC

SENT VIA ELECTRONIC MAIL AND FED EX

CPUC-Energy Division
Attn: Mr. Jason Coontz
505 Van Ness Avenue
San Francisco, CA 94102

Panorama Environmental, Inc.
Attn: Laurie Hietter and Susanne Heim
One Embarcadero Center, Suite 740
San Francisco, CA 94111

Re: A.13-09-014/Salt Creek Substation – Response to Completeness Determination Data Requests dated October 25, 2013

Dear Mr. Coontz, Ms. Hietter and Ms. Heim:

Attached please find SDG&E's response ("Response") to the following data requests dated October 25, 2013: 1) Deficiency Report and 2) Request for Additional Data. **Please note that the Response contains information considered confidential pursuant to PUC Section 583, General Order 66-C and any applicable Non-Disclosure Agreements, Federal and State Laws and Regulations**. The Response has been marked appropriately confidential and should be treated as such. A CD is being sent to each of the parties listed above and the files will also be sent via the secure CPUC FTP website and Sempra EDT website, as applicable.

If you have any questions or require additional information, please feel free to contact me.

Sincerely,

Signed

Jennifer Pierce
Regulatory Case Administrator

Enclosures

cc: Allen Trial – SDG&E
Estella De Llanos – SDG&E
Central Files - SDG&E

Review of San Diego Gas and Electric Company's Application for a Permit to Construct the Salt Creek Substation Project (A. 13-09-014)

DEFICIENCY REPORT FOR THE SDG&E SALT CREEK SUBSTATION PROJECT APPLICATION (A. 13-09-014)

Please note that the items highlighted in yellow are confidential pursuant to PUC Section 583, General Order 66-C and any applicable Non-Disclosure Agreements; Confidential Non-Public Information exempted from disclosure under federal and state law

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in the application (A.13-09-014) and Proponent's Environmental Assessment (PEA) for San Diego Gas and Electric Company's (SDG&E) Application 13-09-014 for a Permit to Construct the Salt Creek Substation Project. Deficiencies were identified using the CPUC PEA Checklist (November 2008) and the CPUC Information and Criteria List (July 2008). Deficiencies are presented in Table 1.

Table 1: SDG&E Salt Creek Substation Project Application 13-09-014 Deficiencies

#	PEA Section(s)/ Page #	Deficiency	SDG&E Response
Project Description			
1	Section 3.5.2.1, Page 3-45; Section 4.16, Question 4.16(c), Page	**Section 3.7.1.4 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding helicopter access and utilization.** ***Clarify the scope of helicopter use during project construction. Define the expected duration and frequency of helicopter use during construction and operation of the project. Identify all helicopter fly yards that may be used for the project and the locations of helicopter refueling areas.***	SDG&E anticipates that helicopters will be used to string sock line for conductor installation and not to transport other materials. SDG&E estimates that helicopter use will be 5 hours per day over 4 days during project construction. Refueling operations will most likely be conducted at Brown Field airport and may be conducted at the Miguel, Hunte Parkway, and

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	4.16-13	***Describe helicopter flight paths.*** The PEA Project Description states that helicopters may be used for installation of overhead conductor and for installation of poles. The PEA Transportation and Traffic section states that helicopter use is only anticipated for stringing the sock line for TL 6965. Please clarify whether helicopters would be used to pick up materials from workspaces outside of the helicopter fly yard/incidental landing area.	Olympic Training Center staging yards. SDG&E anticipates that helicopters may use any of the proposed staging yards as a "fly yard/incidental landing area." Illustrative approach and departure paths are included as **Attachments DR.1-1 through DR.1.-4.**
2	Section 3.5.8, Table 3-5 and page 3-57	**Section 3.7.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding the construction workforce and equipment.** ***Provide the number/quantities of equipment that would be used on the project for each construction activity. Identify the number of workers associated with each activity, the estimated usage level for each piece of equipment (hours/day), and the estimated duration for the activity.*** Additional information on the construction workforce and equipment is required as described in the PEA Checklist (refer to the sample table in Section 3.7.5 of the PEA Checklist). This additional detail is needed to define air quality, noise, and traffic impacts for the project.	Please see the attached Equipment Information Spreadsheet (**Attachment DR.2-1**). This information was used to prepare the air quality, GHG, noise and traffic analyses in the PEA and this response.

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Aesthetics			
3	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations.** ***Provide details on the methodology used to create the visual simulations.*** The PEA does not adequately describe the methods used to capture images of the baseline visual conditions and the methods and software used in the production of the visual simulations. This information is required to substantiate the accuracy and authenticity of the simulations. Provide the following data for each photograph used at the key views and in the simulations: a. Camera make and model b. Film size or digital sensor dimensions c. Lens make and model d. Focal length used for each image e. GPS camera location f. Horizontal and vertical azimuth of the camera frame's nadir g. Time of day h. Single frame or digital stitched images i. Locations and GPS coordinates of any survey control points provenienced j. 3D modeling software used	**Attachment DR.3-1** provides a detailed explanation of the 3D modeling process, the software used, how the 3D view was generated to approximate the camera location and how the model and the baseline photograph were digitally merged to produce the final photo montage. After this summary, there is a list containing each Key Observation Point ("KOP") and specifying detailed recorded photo information, including camera make and model, film size or digital sensor dimensions, focal length used for each image, time of day the photo was taken, and whether the photo was single frame or digital stitch. Both cameras that were used include a built-in lens that was used for the photos. Therefore, the make and model of the camera is the make and model of the lens. GPS coordinates are also noted, however in some cases photos did not have GPS data, so coordinates were located based on aerial photograph and

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		k. How the 3D view was generated to approximate the camera location l. How the model and the baseline photograph were digitally merged to produce the final photo montage	surrounding context analysis. All available data for the horizontal and vertical azimuth is also provided. Nadir was not documented, and no survey control points were used.
Air Quality and Greenhouse Gases			
4	Appendix 4.3-A and Section 3.5.8	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality and greenhouse gas modeling.** ***The equipment identified in the Project Description does not match the equipment identified in the air quality analysis. Please verify the equipment that will be used by the project and remodel to account for air quality and greenhouse gas emissions from all equipment and vehicles that are expected to be used during construction, including helicopters.*** The air quality model did not include the following equipment that were listed in the Project Description: 1. Asphalt grinder 2. Boom truck with trailer 3. Cable dolly 4. Concrete saw 5. Crane (30-ton)	Please see attached comparison of equipment identified in the PEA project description and air quality analysis (**Attachment DR.4-1**). This comparison did identify 2 pieces of equipment (helicopter and vacuum pump) that were listed in the Project Description but were not considered in the air quality and GHG analyses. In addition, as a part of this comparison, SDG&E recognized that a generator had not been included in the project description or air quality calculations. This has been rectified with this submittal, as described in detail below and provided within the attachments. The Air Quality Appendix 4.3-A only provided maximum day calculations, in order to minimize the size of the attachment, and therefore did not show all equipment that was considered in the

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		6. Cat track hoe 7. Pick-up truck 8. Digger/boom truck with material trailer 9. Dump truck with compressor & emulsion sprayer 10. Flatbed truck 11. Flatbed truck (2-ton) 12. Handheld compactor 13. HD flatbed with reel carriers 14. Helicopter 15. Large crane 16. Line assist truck 17. Material/crew truck 18. Oil processing rig 19. Pick-up truck (3/4-ton or 1-ton) 20. Pickup with saw cut trailer 21. Roller 22. Scraper 23. Splice trailer 24. Splice trailer (UG cable) 25. Spreader 26. UG combo truck 27. UG puller trailer (7,000-pound) 28. Vacuum pump	analysis. Comprehensive calculation spreadsheets were provided in SDG&E's response to the Energy Division's Data Request 001 that included the comprehensive equipment listed. This comprehensive excel file has been revised and is provided as **Attachment DR.4-2** to reflect the addition of 2 pieces of equipment to the project description (street sweeper and ditch witch), and 3 pieces of equipment to the Air Quality analysis (a helicopter, vacuum pump, and generator). These additions do not affect the maximum day scenario. A helicopter may be used to string sock line for conductor installation for approximately 4 days (5 hours per day). A vacuum pump will be used during substation equipment installation for approximately 24-48 hours and has been included in the calculations. In addition, a small generator (approximately 5 hp) has been added to the sources in the Salt Creek Substation Construction (260 days, 3 hours per day), TL 6965 Foundation Installation (approximately 30 days, 3 hours per day), and TL 6910 Foundation Installation (approximately 10

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		The air quality model included the following equipment that were not listed in the Project Description: 1. Street sweeper 2. Ditch witch/trencher	days, 3 hours per day).
5	Appendix 4.3-A	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality and greenhouse gas modeling.** ***Provide updated air quality and greenhouse gas emissions modeling results using the CARB reduced load factors for off-road equipment. Alternatively, it is recommended that SDG&E update the emissions modeling using CalEEMod, which incorporates the reduced load factors.*** Page 4.3.A-1 of Appendix 4.3-A states that, "Emission factors from the OFFROAD Model were based on the South Coast Air Quality Management District's . . . composite off-road emission factors (SCAQMD 2012) and/or a mix of Tier 2 and Tier 3 equipment." Use of emission rates from OFFROAD or the SCAQMD emission rates do not include the latest load factors. CARB reduced load factors by 33 percent for most off-road equipment in 2010 (which are reflected in the latest version of CalEEMod). Updating the air quality and greenhouse gas emissions modeling using CalEEMod will correct these inconsistencies.	The California Emissions Estimator Model (CalEEMod) is a new statewide land use project emissions model designed as a uniform platform to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with construction and operation from a variety of land uses, such as residential and commercial facilities. The Air Quality Analysis and calculations were initially conducted in December 2012, and were updated in July 2013 to address minor schedule changes. The CalEEMod Model available at the time the study was conducted had not been updated to include vehicle emission factors from the EMFAC2011 Model, nor did it include the updated load factors cited in the deficiency letter. Thus the updated model was not available at the time of the study. Because the CalEEMod Model is best suited to addressing land use planning projects such as residential and commercial facilities, it is difficult

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		The PEA air emissions calculations do not use CalEEMod, but instead appear to use manual calculations. CalEEMod uses the best available information regarding construction equipment emissions and on-road vehicles emissions. CalEEMod also incorporates the latest versions and emission factors in the OFFROAD and EMFAC2011 models. If SDG&E elects to update the emissions modeling using manual calculations, further documentation is required to support the use of manual calculations. Identify any differences between the manual calculations and CalEEMod, and describe why the manual calculations were used in lieu of CalEEMod.	to fit SDG&E's construction activities within the constrained construction descriptions and phases included within the model. While it may be adequate for analyzing simple (e.g. single phase) energy projects, its limitations make it a less suitable tool for projects such as the Salt Creek Substation with its complex construction phasing. Furthermore, it is not always possible to determine from the CalEEMod Model outputs the specific contribution from individual construction sources. For these reasons, it is more appropriate and more useful to use manual calculations to calculate emissions from the project as provided in the PEA. To address the updated load factors, the calculation spreadsheets have been updated to reflect the latest load factors (**Attachment DR.5-1**). Tables 4.3-7 and 4.7-3 of the PEA have been updated accordingly and are provided in **Attachment DR.5-2.** <u>CalEEMod Limitation Examples</u> To illustrate the limitations of CalEEMod for

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			projects such as the Salt Creek Substation, several examples are provided below. 1. The model does not include a construction phase for components of the Salt Creek Project construction, such as Retaining Walls, Storm Drain and Erosion Control, Substation CMU Wall, Substation Above Grade Construction, Steel Structure Installations, OH Conductor Pulling and Tensioning, and other specific phases of construction for the Salt Creek Project. As a result, to use the CalEEMod Model, it is necessary to attempt to fit construction phases into the model's limited construction phasing, which was designed more to address land use projects such as residential developments than substation and transmission line construction. 2. It would be necessary to represent a construction phase such as Steel Structure Installations within the CalEEMod Model as "Site Preparation", "Grading", "Trenching", "Building Construction", "Paving", or "Architectural Coatings".

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			CalEEMod does not easily allow specification of certain types of vehiclesthat will be used on site. For example, SDG&E will use trucks rated for on-road use for this project, but CalEEMod models off-road trucks. Off-road trucks are not appropriate to model trucks that are certified and meet on-road standards. 3. CalEEMod also makes assumptions regarding the number of deliveries and trucks used, which must be adjusted. 4. CalEEMod appears to add in equipment that has been removed from the analysis that will not be used in the construction for the project. The CalEEMod Model does this because of the limitations of the model and its inflexibility in fitting the specific construction activities associated with constructing the Salt Creek project into CalEEMod categories that best represent land use projects. 5. CalEEMod doesn't allow the designation of trucks that would be used on site, but are not technically "offroad trucks", as

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			anything but offroad trucks. The way this has been addressed in the analysis is to use the idling emission factors from EMFAC2011 to account for the use of trucks that are certified for on-road use in the construction scenario. Offroad trucks do not have to meet the same emission standards as onroad trucks, so the CalEEMod Model calculates higher emissions for these trucks than for on-road trucks. 6. CalEEMod does not allow easily a mixture of Tier 2 and Tier 3 equipment to be specified. Rather, equipment can be either Tier 2 or Tier 3, but it is difficult to specify a mix within the constraints of the model. This project will use a mix of Tier 2 and Tier 3 equipment.
Biology			
6	Section 4.4, Tables	**Section 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding potential presence of special-status species.**	Find attached revised Tables 3-3 and 3-4 of the BTR, inclusive of those species outlined in Appendix A of your letter, and their potential to

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	4.4-3 and 4.4-4	***Define the potential to occur in the project area for each special-status species listed by the California Natural Diversity Database (CNDDB) within the Jamul Mountains, Otay Mesa, Imperial Beach, National City, Otay Mountain, Dulzura, La Mesa, El Cajon, and Alpine quadrangle areas.*** Section 4.4 of the PEA and the Biological Resources Technical Report (BRTR) state that the CNDDB nine-quadrangle area surrounding the project was reviewed to identify special-status species that may occur within the project area. A number of special-status species that are listed in the CNDDB nine-quadrangle area were not identified or addressed in the PEA or BRTR. The potential for each of these species to occur in the project area must be defined with evidence (e.g., potential of suitable habitat or distance to nearest suitable habitat area) to substantiate the potential. These additional species that should be addressed in the PEA are identified in Appendix A to this document.	occur (**Attachment DR.6-1**). Further, information within Table 3-4 has been modified for species detected in 2013 that were not previously documented on-site (i.e., red diamond rattlesnake and horned lark).
Cultural Resources			
7	Sections 4.4 and 4.5	**Sections 5.3 and 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding surveys for biological and cultural resources.** ***Provide biological and cultural resource survey reports for alternate staging areas.*** The PEA did not include survey data for the Olympic	*Biological Resources* The alternative staging yards were surveyed for potential biological resources as a part of the overall survey effort. However, due to the fact that the staging yards were considered optional, they were not considered in the overall impact

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		Training Center alternate staging areas. These data are required to evaluate the potential impacts of staging in these locations.	analysis. A letter has been prepared to summarize the results of the field effort. This letter is provided in **Attachment DR.7-1**. *Cultural Resources* Please see Letter Report: Final Cultural Resources Survey for Proponents Environmental Assessment (PEA) for the Salt Creek Substation and Transmission Line Improvements Project in the Otay Mesa Area of Southwestern San Diego County, California (AECOM 2013). All five Olympic Training Center alternate staging areas were surveyed for cultural resources; two isolated finds, P-37-015375 and P-37-015377, have been previously recorded near Alternative OTC 3 (Kyle and Tift 1993a, 1993b). No other cultural material was observed within any of the five OTC alternative staging yards.
8	Section 4.5	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding impacts to cultural resources.** ***Revise the impact analysis to reflect that work within the***	Section 15064.5 of the CEQA Guidelines states that a project may have a significant environmental effect if it causes a substantial adverse change in the significance of a historic resource. Sites in the

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		boundaries of known archaeological sites could result in potentially significant impacts, regardless of whether or not the main loci of the sites are avoided. Revise the impact assessment to address impacts to potentially significant cultural resources along project access roads, staging areas, and areas where surveys were limited by poor visibility. Prepare a Cultural Resources Monitoring and Mitigation Plan (including more extensive in-field monitoring) and a Treatment Plan in accordance with CEQA Guidelines Sections 15064.5 and 15126. 4 prior to publication of the Final CEQA document. Construction of the proposed project would occur within the boundaries of nine large, potentially significant cultural sites. Work within these sites must be treated as significant (PEA page 4.5-9). Only small portions of the sites were tested and, therefore, avoiding loci within these sites cannot be considered as avoiding the site, which has an encompassing border. Additionally, project archaeological surveys were commonly limited by heavy vegetation and very low visibility, limiting the effectiveness of the surveys. Some roads would require widening and modification that would require cut-and-fill operations for use of heavy equipment, the impacts of which are not adequately addressed in the PEA.	Otay Mesa area consist primarily of discrete loci with little subsurface potential combined into single resources, with little subsurface potential between the discrete and geographically distant loci and limited potential within loci themselves. Based on previous surveys investigations, testing programs, and geotechnical and potholing monitoring conducted at these sites, no substantial adverse changes to these sites are anticipated. Because no substantial adverse changes would occur related to a historical resource as defined in Section 15064.5, no impact would occur. A CMMP, including a treatment plan for inadvertent discoveries, is being developed prior to construction. This will address all potential impacts to unavoidable known resources and inadvertent discoveries within the project area including densely vegetated areas where surveys were limited by poor visibility. In addition, the CMMP will require the archaeological consultant to retain a curation agreement with the San Diego Archaeological Center (SDAC) prior to the start of construction. The impact analysis section has been revised to indicate that a CMMP, including

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		The Applicant Proposed Measures (APMs) provided in the PEA do not adequately mitigate the potential impacts of the project. APM-CUL-3 (page 4.5-28) calls for limited monitoring in the immediate area of some of these sites and within the existing substation property. APM-CUL-2 (page 4.5-28) states that significant cultural resources along pole replacements and stringing sites (i.e., CA-SDIs 4529, 4897, 7197, 12067, 4897, 7197, 12067, and 12909) would be preserved in place or, if not feasible, would be evaluated. The measure indicates that a Research Design and Data Recovery Program would be prepared at that time, if necessary. Preparing a Research Design and Data Recovery Program during construction would likely be disruptive to the construction schedule. The measure also does not include lead agency review and approval, and does not ensure that impacts are adequately mitigated. Large numbers of resources are likely to be found during construction. A curation agreement must be in place with San Diego California Historic Resources Inventory System (CHRIS) prior to construction to handle these resources. To adequately mitigate the potentially significant effects of working within the boundaries of known, potentially significant resources, and to address the potential for encountering new resources in other areas where surveys	an inadvertent discovery plan is currently being developed and will be approved prior to the start of construction (**Attachment DR.8-1**). With implementation of the CMMP, impacts to cultural resources that cannot be avoided will be reduced to less than significant. A table matrix included as Table 1 in the AECOM 2013 cultural resources technical report identifies specific project areas where cultural resource monitors would be required during construction subject to the CMMP.

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		were limited, a Cultural Resources Monitoring and Mitigation Plan (CMMP) and a Treatment Plan (TP), prepared in accordance with CEQA Guidelines Sections 15064.5 and 15126.4, must be established and approved by CPUC prior to construction. The CMMP should establish methods for resolving adverse effects through recovery of significant information from archaeological sites. At a minimum, the CMMP should include the following: • A summary of available information on known sites and sensitive locations in the project area • A historical context for the evaluation of resources that may be encountered during construction • A research design outlining important historical themes and research questions relevant to the known sites in the study area • Data requirements and the appropriate field and laboratory methods to be used to acquire data needed for significance evaluation and impact mitigation • Specific project areas where cultural resource monitors would be required during construction, including along access roads and staging areas where surveys were limited due to heavy	

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		vegetation and low visibility (and not just within the boundaries of known sites) The TP should identify reporting and curating requirements for artifacts uncovered during construction.	
9	Section 4.5	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys.** ***Provide a map and GIS layers that show all survey areas relied upon for the cultural resource analysis (including areas from the HDR surveys [Clowery and Blotner 2012]). Ensure that all project areas, including all access roads, staging areas, and project construction areas, have been adequately surveyed.*** The project survey areas are not clearly defined in the PEA. All project work areas must be surveyed to ensure that project impacts are disclosed and adequately addressed. Provide a map and GIS layers showing the surveyed areas, including any areas surveyed in previous reports, so that they can be compared with all work areas described in the Project Description.	The map of the cultural survey areas are provided in **Attachment DR.9-1** and the GIS Shapefiles of the survey area being provided via file transfer to the CPUC, and are being transmitted under title "**Attachment DR.9-2**". Cultural Resources Survey Limits - GIS Shapefiles." Provided below is a summary of the GIS Shapefiles of the survey area. HDR surveyed the Proposed Otay Ranch Substation project Area of Potential Effect (APE) that included: - Proposed Salt Creek Substation footprint (formerly Otay Ranch Substation) - Salt Creek staging yard (formerly Otay staging yard) HDR surveyed the TL 6910 project APE that included: - TL 6910 corridor with 90-foot buffer on both sides - Pole locations

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			- Stringing sites - Access roads - Salt Creek staging yard (formerly Otay staging yard) - Miguel/Existing staging yard AECOM surveyed project-specific components of the Salt Creek Project listed below (even if the areas had been previously surveyed by HDR), as well as all portions of the Salt Creek Transmission Line Corridor and associated access roads that were not surveyed by HDR during the TL 6910 surveys. - Pole locations with 90-foot radius buffer - Work pads - Stringing sites with a 50-foot buffer - Guard structures - Miguel/Existing staging yard - Eastlake Parkway staging yard - Hunte Parkway staging yard - Five OTC staging yards - Access roads previously un-surveyed with a 10-foot buffer on both sides - New spur roads with a 10-foot buffer on both sides

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			See Attachment DR.9-1 for details.
Geology and Soils			
10	Section 4.6	**Section 5.6 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding importation of fill.** ***Confirm the amount of fill to be imported for the project.*** The project description states there will be 94,000 cubic yards (CY) of cut and 138,000 CY of fill with 44,000 CY of import soil. The geotechnical report states that some of the cut soils may be unsuitable for use as fill, which would require additional soil to be imported to the site above and beyond the 44,000 CY estimated. Please confirm the amount of fill to be imported. If a precise number cannot be provided, please provide a "worst-case scenario" estimate of additional soils that would need to be imported and a description of how the cut soils will be evaluated for suitability as on-site fill. The worst-case scenario should be factored into the air, greenhouse gas, noise, and traffic analyses.	At this time we believe that all of the soils on site may be used in accordance with the recommendations of the geotechnical report. Said uses include, but are not limited to: 1. Fine grain materials may be used for non-structural fills on-site including slopes 2. On-site materials may be used to complete project grading 3. Soils with an expansion index over 50 may be blended with other granular soils and used as embankment fill or as deeper compacted fill in non-structural areas but not placed in the outer portion of fill slopes. 4. Fine grained colluvium may be placed in non-structural areas The import fill quantity presented in Section 5.6 (44,000 CY) is considered to be a worst-case scenario and was factored as such in air,

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			greenhouse gas, noise, and traffic analysis. It is worst-case scenario because the original, conservative estimate of total fill needed is likely to exceed the actual amount of fill ultimately needed. Cut soils will be evaluated for suitability as fill by the geotechnical engineer who will be on site full-time during grading operations.
Greenhouse Gas Emissions			
11	Section 4.7	**Section 5.10 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding greenhouse gas emissions.** ***Please quantify greenhouse gas emissions reductions resulting from implementation of measures proposed in the PEA.*** Several project design features and ordinary construction/operation restrictions discussed in the PEA could result in the reduction of greenhouse gas emissions. These reductions need to be quantified.	Implementation of the emission control measures were not originally part of the GHG emissions calculations. The GHG emissions have been recalculated with the incorporation of the emission control measures and Table 4.7-3 of the PEA has been updated accordingly (see **Attachment DR.5-2**).

Hazards and Hazardous Materials			
12	Section 4.8.4, page 4.8-16	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding construction of TL 6965 near existing utilities.** ***Provide documentation on the depths and locations of nearby existing (and proposed if applicable) utilities in relation to the proposed location of TL 6965. Provide the analysis to support the conclusion in the PEA that there would be no significant effect on the gas pipelines (the project will not cause corrosion of the nearby pipelines or create a hazard for construction workers or the public). Quantify the potential induced current and interference in adjacent pipelines, including the two high-pressure gas lines and the two water lines.*** The subsection under TL 6965 and TL 6910 Loop-in (Section 4.8.4, page 4.8-16) addresses hazards related to construction of TL 6965 within an existing transmission corridor that also includes subsurface gas pipelines and water lines. The discussion that follows refers to a "design and engineering review" that would determine if any additional support is needed for construction equipment. It also states that pole locations, grading, and underground facilities would be designed and engineered to avoid hazards associated with the adjacent utilities. The conclusion is that impacts would be less than significant; however, there is no specific information supporting this conclusion. TL 6965 construction involves subsurface excavation for pole foundations and may interfere with existing subsurface features. Substantial evidence is needed to demonstrate that the project will not create a	***Please note that this response contains information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; PUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.***

		hazard for construction workers and the public during installation of the poles and operation of the power line. Evidence is required to determine the potential for induced current and interference in adjacent pipelines and that the project would not cause corrosion or safety hazards. Identify the distance from the power line alignment to each pipeline.	
Noise			
13	Section 4.12.3.2, page 4.12-10 and Questions 4.12(c) and 4.12(d)	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise impacts on sensitive receptors.** ***Provide data and analysis of noise impacts on users of the Hunte Parkway Trail and any other trails in the vicinity of the substation, including the sewer access road, during construction and operation.*** The PEA discusses the Hunte Parkway Trail as a noise-sensitive receptor. There are several other trails and pathways near the proposed substation. The impacts analysis does not, however, analyze impacts to users of the Hunte Parkway Trail or any other trails that appear to be located in the vicinity of the substation.	The PEA generally defines noise-sensitive receptors as residences, churches, and schools, but explains that the definition may also include others uses like passive recreation areas, on page 4.12-2 and again on page 4.12-10. Reference to passive recreation areas, including trails, in these sections was conservative because passive recreation areas are not noise-sensitive receptors under either of the applicable regulatory schemes. The County of San Diego defines a noise-sensitive receptor as locations "at which there is a reasonable degree of sensitivity to noise (such as residences, schools, hospitals, elder care facilities, libraries, cemeteries, and places of worship). The City of Chula Vista defines noise-sensitive receptors as residences, schools, churches, libraries, athletic fields, and community parks. Because neither the City nor the County defines walking trails as noise-sensitive receptors, they are not noise-sensitive receptors for the purposes of the noise analysis. In addition, the PEA noise analysis concluded that construction and operation noise would create a less than

			significant impact to the noise-sensitive receptors that are adjacent to the project corridor. Therefore, even if trails were noise-sensitive receptors, the impacts to such trails would be less than significant. Trails in the immediate vicinity of the substation (including the Hunte Parkway Trail, and Proposed Trail) would be exposed to noise from construction of the Substation. However, trail users would be exposed to noise for only a short duration of time, as they are mobile and would not be expected to remain on the trail in the vicinity of the substation for any length of time. This confirms that impacts to trail users would be less than significant, if the trails were considered a noise sensitive receptor.
14	Section 4.12.4.2, Questions 4.12(c) and (d)	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise impacts on sensitive receptors.** ***Identify sensitive receptors that would be affected and identify the effects to sensitive receptors due to helicopter use. Quantify the number of sensitive receptors by type (residences, schools, parks, hospitals, etc.) located along the helicopter flight path that would be subject to noise levels in excess of City of Chula Vista and County of San Diego noise standards.*** The Project Description states that helicopters would be used during construction of the project and for aerial inspections. The PEA analyzes noise levels in the right-of-way (ROW).	The existing baseline condition includes helicopters flying the transmission corridor for routine operation and maintenance inspection of the existing transmission lines. Typical annual inspections include one annual visual aerial (February-May) inspection and one infrared aerial (July-October) inspection which would place a helicopter in slow cruise flight at approximately 400'- 500' above the ground for approximately 15 minutes along the 5 mile transmission corridor. Numerous sensitive receptors are located along the transmission corridor, as noted in this question, including residents, churches, and schools. SDG&E uses best efforts to consolidate

		However, the potential for noise impacts on sensitive receptors (e.g., schools and residences) from use of helicopters during operation and maintenance is not addressed in the PEA.	the maintenance inspections for all facilities within the transmission corridor into a single helicopter flight. This would avoid any change in the existing baseline condition associated with operation and maintenance of the proposed transmission line, because routine inspections would be accomplished for all lines at the same time. However, if the annual inspections were not consolidated, then two additional inspection flights could occur along the transmission corridor, as described above. Existing helicopter operation and maintenance inspection activities are of a very limited duration (15 minutes along the 5-mile transmission corridor). The helicopter travels over each location for only a few seconds. Therefore the helicopters do not result in noise levels in excess of City of Chula Vista and County of San Diego noise standards. Refer to the discussion of construction noise levels for helicopter use during construction (page 4.12.13 of the PEA) for specific information on helicopter noise levels. Since noise levels for sensitive receptors along the helicopter flight path would not exceed City or County noise standards, the number of noise-sensitive receptors along the corridor need not be quantified.
Alternatives			
15	Section	**Section 6.2 of the PEA Checklist and Section V(14)(b) of the**	***Please note that this response contains***

	5.5.2 and Table 5-3, pages 5-13 and 5-15	**Information and Criteria List regarding power line alternatives.** ***Explain why TL 6910 could not be rebuilt as a double circuit within the ROW.*** The alternatives analysis in the PEA provides a brief evaluation of alternatives considered for the 69-kV power line. It is unclear from this evaluation how rebuilding TL 6910 from Miguel Substation to Salt Creek Substation does not meet the objective of "locate[ing] proposed new power facilities, as appropriate and as needed, within existing utility rights-of-ways (ROWs), access roads, and utility-owned property." TL 6910 appears to be located within SDG&E's ROW. Provide a map showing the boundaries of the ROW. Please identify where this alternative would require acquisition of additional ROW adjacent to and west of the existing transmission corridor and where residences would be displaced by the alternative.	***information considered confidential under the North American Reliability Corporation's Rules of Procedure, Section 1500 et seq.; PUC Section 583 and G.O. 66-C and other applicable Federal and State Laws and Regulations.***
