

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 11, 2015

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Follow-up Data #7 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of San Diego Gas and Electric Company's (SDG&E) application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project) and SDG&E's responses to Data Requests #1 through #6.

The CPUC requests clarifications to some of SDG&E's revisions to the Project Description provided in responses to Data Request #6. A clean version of the Project Description is attached with comments indicating where additional information is needed. Please provide clarifications to the Project Description in track-changes, where requested.

The CPUC also requests data based on the SDG&E's submittal in response to Data Requests #5 and #6. The additional data needs and corrections or clarifications are specified in Table 1, below.

Information provided by SDG&E in response to this Request for Additional Follow-up Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than February 25, 2015. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the EIR.

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 CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Billie Blanchard".

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

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cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Peter Allen, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental
Susanne Heim, Deputy Project Manager, Panorama Environmental
Darryl Gruen, Attorney for ORA
Chris Myers, ORA
Alan Colton, SDG&E Director - Major Projects

**REQUEST FOR ADDITIONAL DATA:
DATA NEEDS #7 FOR THE SYCAMORE-PEÑASQUITOS
230-KILOVOLT TRANSMISSION LINE PROJECT
APPLICATION (A. 14-04-011)**

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified additional areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

Table 1: Application No. 14-04-011 Data Needs #7

#	Reference Source, Page #	Data Need
1	N/A	Provide a typical detail of a Steel H-Frame Structure SDG&E's revisions to the Project Description indicated that a steel H-Frame structure will be replaced.
2	Data Request #5	Provide GIS data for burrowing owl suitable habitat The burrowing owl habitat assessment report includes maps showing the locations of suitable habitat for burrowing owls; however no GIS data was provided to the CPUC with the report. Please provide the GIS data for the suitable habitat polygons including for the newly proposed Black Mountain and Evergreen Nursery staging yards.
3	Data Request #6	Provide a complete GIS data set for rare plants The Biological Resources Technical Report includes rare plant locations that are not in the rare plant GIS data set that was recently provided to the CPUC. This data set is therefore incomplete. SDG&E needs to provide a data set that includes all rare plant locations documented in the BRTR and in the 2014 rare plant surveys, including any species found at the Black Mountain and Evergreen staging yards during 2015 surveys.
4	Data Request #5, Item 9	Review and revise the summary tables for 2016 and 2017 emissions of PM₁₀. The table shows unmitigated emissions of PM ₁₀ in 2017 (Table A-27) would be less than the mitigated emissions of PM ₁₀ (Table A-28). Please explain why the mitigated emissions are greater than the unmitigated emissions or provide a revised table. The annual PM ₁₀ emissions in 2017 are lower than those in 2016; however, the

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#	Reference Source, Page #	Data Need
		annual PM _{2.5} emissions in 2017 are higher than those in 2016. The level of PM ₁₀ emissions should be directly proportional to the level of PM _{2.5} . Please review annual emission estimations for PM ₁₀ and PM _{2.5} for both 2016 and 2017 (Tables A-27 and A-28) and revise them accordingly if needed.
5	N/A	<p>Provide SDG&E's herbicide use plan or procedures for application of herbicides.</p> <p>APM HAZ-4 states that herbicide use would follow SDG&E's existing procedures for application of herbicides. The CPUC needs documentation that describes these procedures.</p>
6	Data Request #5, Response #1	<p>Provide GIS Data for Reconductoring Workspaces at Existing O&M Pads</p> <p>SDG&E's comments on the Draft EIR Project Description (ED05 - Q1(a)_EIR Project Description) ask if the existing O&M structure pads should be included in the temporary disturbance values for the project because they will be used during reconductoring.</p> <p>CPUC intends to include these areas on project detail maps and temporary disturbance values. Please provide GIS data for the extent of the existing O&M pads that will be used during reconductoring. The following existing structures in Segments C and D are not currently located in a designated project workspace (e.g., structure installation, structure removal, or stringing site):</p> <ul style="list-style-type: none"> • Segment C: E4, E5, E6, E8, E9, E10, E11, E12, and E13 • Segment D: E21, E25, E26, and E27 <p>Please identify and provide GIS data for any other reconductoring workspaces, including any additional workspace needs surrounding existing structures in Segment D near the edge of previously identified workspaces (i.e., E14, E15, E17, E19, and E22). Please clarify if any other work activities besides reconductoring may occur at these locations, such as temporary material laydown or equipment storage.</p>
7	Data Request #5, Response #5 Follow-up	<p>Provide DPR forms for the previously recorded resources adjacent to the two additional staging yards including:</p> <ul style="list-style-type: none"> • SDI-5536 • SDI-6672 • SDI-13195 • 37-15000 • 37-016576 • 37-016575 • 37-016577 • SDI-12933 • 37-113867 • 37-xx5218 (site number partially obscured by the Legend)

Table 1: Application No. 14-04-011 Data Needs #7

#	Reference Source, Page #	Data Need
8	Data Request #5, Response #5 Follow-up	<p>Provide an evaluation of the boulders identified at the Black Mountain Yard in the January 2015 cultural resources letter report.</p> <p>For the proposed Black Mountain yard, the only available DPR form (CA-12933H, continuation sheet from October 2013) describes the previously recorded site as "a small scatter of prehistoric and historic artifacts." In 1992, "The site contained three fragments of purple glass, a metavolcanic flake, and a porphoritic volcanic fire-affected mano fragment." A structure stood on this site in 1903 and earlier. The October 2013 survey "determined that the site has been destroyed by construction." The January 2015 letter report mentions multiple boulders within the project impact area without indicating whether they were examined for milling surfaces, bedrock mortars, or other indications of Native American use. Overview photos (Figure 7) suggest the area might have been a fairly attractive living site centuries/millennia ago; this suggestion is generally supported by the presence of the mano (grinding handstone) fragment that would have been utilized in grinding and milling activities associated with one or more boulders. If the boulders were examined carefully for evidence of use and none was found, this information should be provided. If the boulders were not carefully inspected, this should be done at this time.</p>
9	Data Request #5, Response #5 Follow-up	<p>Provide results of special-status plant, coastal California gnatcatcher, and burrowing owl surveys and a jurisdictional delineation for the proposed staging yards at Black Mountain Ranch Community Park and Evergreen Nursery.</p> <p>The biological resources documentation (report and GIS files) submitted by SDG&E on February 3, 2015 states that surveys for special status plant species, coastal California gnatcatcher, and burrowing owl are necessary but not specifically where relative to the two additional staging yards. The report also indicates that a jurisdictional delineation is needed for these yards, and that all of these surveys should be conducted concurrent with other project surveys in 2015. Provide these additional survey results or identify when they are expected to be submitted.</p>