

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 25, 2016

Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court, CP32-F
San Diego, CA 92123-4150

**RE: Application Completeness – Permit to Construct the TL 695 and 6971
Reconductoring Project – Application No. A.16-04-022**

Dear Ms. Giles:

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.16-04-022) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the TL 695 and TL 6971 Reconductoring 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 TL 695 and 6971 Reconductoring 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 CEQA document in a timely manner. The following list identifies the portions of the application found to be deficient:

- 1. Information Necessary to Complete an Adequate CEQA Document for Public Review is Marked Confidential.** Every page of both the hardcopy and digital copy of the PEA provided to the CPUC is marked as confidential under Public Utility Code Section 583 and General Order 66-C. The majority of the confidential version of the PEA is identical to the public version also provided to the CPUC; it is therefore unclear which information is confidential and which is not. Much of the information contained in the PEA (e.g., Project Description, objectives, maps, environmental and regulatory setting for all environmental parameters) must be presented in the CEQA environmental document, which is a public review document. Please re-submit the PEA materials removing any notation regarding confidential under Public Utilities Code Section 583 and General Order 66-C for those sections that are not confidential. Generally, confidential materials include cultural resource site locations, detailed substation schematics, detailed utility pole information (i.e., SDG&E-designated pole numbers), and regional system maps.

2. **Provide a summary of SDG&E's communication with California Department of Parks and Recreation.** Figure 3-2 of the PEA shows that the project would be located on lands leased by the Department of the Navy (DoN) to the California Department of Parks and Recreation (California State Parks). Coordination with California State Parks is particularly important for this project given the popularity of the San Onofre State Beach to recreationalists. Input from California State Parks could influence project construction methods or the project design. Please provide a summary of your coordination with California State Parks.
3. **Provide a Copy of SDG&E's Existing Easement with MCB Camp Pendleton.** The conditions of SDG&E's existing easement with the DoN are needed to assess whether the proposed project would comply with easement restrictions and land uses. Please provide the existing easement (or relevant language) or provide a thorough and complete list of restrictions from the easement. Provide a cross section showing how the new alignment fits within the easements. Provide an explanation of the relationship, if any, between the DoN's lease to California State Parks and SDG&E's easement going through San Onofre State Beach.
4. **Define Access Roads.** The project maps show footpaths to access several steel pole sites. Many of these sites are designated as direct bury pole sites, which would likely require the use of an auger to drill a hole before placement of the foundation. Clarify if and which pieces of equipment would be required at these pole sites and any improvements to the footpaths that would be required to accommodate equipment access.
5. **Define Pole Heights and Locations.** The Project Description describes a large range in pole heights (25 to 105 feet) but does not adequately describe the heights of each type of pole that will be used for the project or the heights of the new poles at each location. Additionally, Appendix 3-C, which provides typical drawings of poles, provides height approximations outside of the range (i.e., 110 feet tall for proposed steel cable pole) described in the Project Description. Revise the typical pole drawings to reflect the approximate height range of the proposed project poles and define pole heights by their location along the alignment.
6. **Define Marker Ball and Lighting Requirements.** The PEA states that SDG&E would coordinate with the Federal Aviation Administration regarding the placement of marker balls and lighting to mark obstructions. The location of marker balls and lighting is required to analyze visual impacts from these project elements. Provide the location(s) of marker balls and lighting.
7. **Provide Supplemental Cultural Report and GIS.** The PEA states that several project areas located outside of the Project Study Area (PSA) have not been surveyed for cultural resources. Complete these cultural surveys and provide the cultural resources survey report for these areas. Additionally, the PEA submittal did not include GIS data for any cultural resources, which is needed to evaluate the cultural resource sites in proximity to project elements. Provide GIS data from all cultural resource surveys conducted for the project that includes the survey areas and the boundaries of the resources found. Note that the submission of several aspects of the cultural reports will need to be made public. These aspects include the historic setting, a general summary of the records search, survey methods and survey area, and a general description of the outcome of the surveys (but not

revealing locations of resources found). This information will need to be submitted in a format that can be used to support the environmental document, which will be released to the public. Locations of cultural resources should be kept confidential.

8. **Provide Cultural Resources Records Search.** A copy of the records search requested from the South Coastal Information Center and South Central Coastal Information Center is needed to evaluate the adequacy of the effort to identify all previously recorded cultural resources in the project area. Provide a copy of the records search as well as all associated DPR forms.
9. **Provide Cultural Resource Eligibility Determinations.** Since the court decision was issued for *Madera Oversight Coalition, Inc. v. County of Madera*, the CPUC has required that all resources that are within the project area of effect and cannot be entirely avoided, be tested for eligibility for listing on the California Register of Historic Resources (CRHR) or National Register of Historic Places (NRHP). Provide a report that provides eligibility determinations for all resources within the project area that have not been previously tested.
10. **Provide Supplemental Biological Resource Report and GIS.** The PEA states that several project areas located outside of the PSA would be surveyed for biological resources in spring 2016. Complete the surveys and provide the biological resources survey report for these areas. Additionally, the PEA submittal did not include GIS data showing the survey locations, survey results, and habitat mapping of biological resources, which is needed to evaluate the resources in proximity to project elements. Provide GIS from all biological resource surveys conducted for the project. Biological information, including survey methods, locations, and results is needed for preparation of the CEQA document and will be made public as part of the environmental analysis. The biological reports should not be confidential, as they are needed to disclose to the public and agencies, for review and comment, the methodologies used and results upon which the CEQA analysis is based.
11. **Provide Supplemental Wetland Delineation.** The PEA states that several project areas located outside of the PSA will require supplementation jurisdictional wetland surveys. Complete these delineations and provide the wetland delineation survey report for these areas, including GIS data files.

Information provided by SDG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.16-04-022. 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 report no later than June 24, 2016. 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 415-703-2642 or william.maguire@cpuc.ca.gov.

Sincerely,

/s/ William Maguire
William Maguire
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Marcelo Poirier, CPUC Attorney
Tania Treis, Project Manager, Panorama Environmental
Susanne Heim, Project Manager, Panorama Environmental