

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In The Matter of the Application of SAN DIEGO GAS
& ELECTRIC COMPANY (U 902 E) for a Certificate of
Public Convenience and Necessity for the Sycamore-
Penasquitos 230 Kilovolt Transmission Line Project

Application 14-04-011

**PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E FOR
MODIFICATION OF DECISION NO. 16-10-005 REGARDING THE SYCAMORE-
PENASQUITOS 230 KILOVOLT TRANSMISSION LINE PROJECT**

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I. INTRODUCTION

Pursuant to Rule 16.4 of the California Public Utilities Commission’s (“CPUC”) Rules of Practice and Procedure, General Order (“GO”) 131-D, the California Environmental Quality Act (“CEQA”), and the California Public Utilities Code, San Diego Gas & Electric Company (“SDG&E”) hereby files this Petition for Modification (“PFM”) of Decision No. (D.) 16-10-005. In that decision, the CPUC granted SDG&E a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project, configured with Alternative 5 (Pomerado Road to Miramar Area North Combination Underground/Overhead), and subject to the mitigation measures identified in the Mitigation Monitoring and Reporting Plan (“MMRP”) attached to the order (“Project”). D.16-10-005 was deemed effective October 13, 2016.

SDG&E is submitting this PFM to modify CPUC Decision 16-10-005 to seek authorization to re-tension and sag approximately two miles of the existing 230-kV transmission line (“TL23013”) located south of the Project. A Map showing the location under consideration

for the Proposed Project Modification is included in Attachment D, Section 2, Figure 2-1 of this Petition.

II. PROCEDURAL HISTORY

On April 7, 2014, SDG&E filed Application (A.) 14-04-011 for a CPCN to construct the Project. The CPUC issued a Draft Environmental Impact Report (Draft EIR) for the Project on September 17, 2015, a Final Environmental Impact Report (Final EIR) on March 7, 2016, and an Addendum to the Final EIR was published in May 2016. On October 13, 2016, the CPUC certified the Final EIR (State Clearinghouse No.2014081031) and issued SDG&E a CPCN authorizing construction of the Project with mitigation measures for approved project (EIR alternative 5) identified in the MMRP attached to D.16-10-005.

The Project scope consists of constructing a new 230 kV transmission line between the existing Sycamore Canyon and Peñasquitos Substations. The California Independent System Operator (CAISO) and a statewide task force, requested by Gov. Brown, identified the Project as essential to ensuring long-term reliability due to the planned retirement of coastal power plants and the closure of the San Onofre Nuclear Generating Station. Construction of the Project began in January 2017, and SDG&E energized the new 15-mile Sycamore to Peñasquitos electric transmission line (“TL23071”) on August 29, 2018.

The new Sycamore to Peñasquitos transmission line effectively acts as a highway – adding a new pathway to the regional power grid that creates an additional means for energy to reach customers while enhancing reliability in communities including Mira Mesa, Scripps Ranch and the City of Poway. On a grander scale, this transmission line helps alleviate traffic locally, so energy can reach other parts of the region quicker – leading to improved reliability on a state-wide level.

III. LEGAL STANDARD

A party may file a PFM to request that the CPUC make changes to an issued decision. Under Rule 16.4(b), PFMs shall “concisely state the justification for the requested relief.” In Section IV, below, SDG&E explain the need for the requested relief. Rule 16.4(b) further provides that factual allegations of new or changed facts must be supported by an appropriate declaration or affidavit, or matters that may be officially noticed. SDG&E provides the declaration of Jennifer L. Kaminsky, SDG&E Project Manager - Transmission & Distribution Projects, as Attachment A to support this PFM and allegations of new and changed circumstances. A PFM “must propose specific wording to carry out all requested modifications to the decision.” Rule 16.4(b). In Section VI, SDG&E propose changes to the findings of fact, conclusions of law, and ordering paragraphs in D.16-10-005. Under Rule 16.4(d), if more than one year has elapsed, the petition must explain why the PFM could not have been presented within one year. SDG&E explain the need for delay in presenting this PFM in Section IV, below.

IV. JUSTIFICATION OF THE PETITION FOR MODIFICATION

Subsequent to the issuance of D.16-10-005, SDG&E began final engineering of the Project, configured with Alternative 5, which included a detailed evaluation of the appropriate conductor tension needed for the Project. The information in this PFM request describes a minor change to portions of existing TL23013 that extends south of the Project.

After SDG&E learned that modifications to the Project would likely be required, SDG&E initiated discussions with CPUC Energy Division about the appropriate mechanism to seek authorization for the necessary modifications to the approved Project. Based on communications with Energy Division, it was initially determined that SDG&E could submit a Minor Project Refinement (MPR) Request #8 in accordance with the processes identified in the

MMRP.¹ SDG&E herein provide a copy of MPR Request #8, dated September 12, 2017, as Attachment B to support this PFM and allegations of new and changed circumstances.

Attachment B explains in more detail why the requested change is consistent with the relevant analyses in the Final EIR.

On October 16, 2017, Energy Division notified SDG&E in a letter (Disposition) that:

The CPUC finds that the proposed work spaces associated with MPR #8 are outside of the geographic boundary of the EIR study area; therefore, an application for a Petition for Modification (PFM) must be submitted.

See Attachment C, Disposition letter from Billie Blanchard, Project Manager - Energy Division CEQA Unit, to Jennifer Kaminsky, SDG&E Project Manager, dated October 2017.

Based on ongoing communications with Energy Division and CPUC Legal Division, SDG&E is filing this PFM to request CPUC authorization of the Proposed Project Modification. The Proposed Project Modification includes re-tensioning and sagging approximately two miles of TL23013 south of cable pole CC MM CP to the next dead-end structure (Z479040) consisting of 16 Tubular Steel Poles (TSPs) and 16 spans. The Proposed Project Modification includes the following activities:

- Use of existing access roads and pads;
- Minimal vegetation clearing and trimming around existing roads and pads;
- Re-tension and sag the existing 230-kV line from CC MP CP south to the next dead-end structure (Z479040) consisting of 16 TSPs and 16 spans;
- Use of the temporary work space and access road at the next dead-end structure (Z479040) as a pull site;

¹ Typically activities to tension existing transmission line conductors are considered routine maintenance rather than construction under G.O. 131-D, Section III.A..

- Removal and replacement of existing dampers and wire clips;
- Use of standard traffic control methods where stringing occurs across public access roadways and railroads;
- Installation of 14 temporary guard structures to prevent any dropped conductor from coming into contact with pedestrians, vehicles, or utilities (e.g., distribution lines and communication facilities) located beneath the wire; and
- Performance of other work activities necessary to comply with Project requirements (e.g., watering for dust control).

For a more detailed discussion of the Proposed Project Modification, see Attachment D, Environmental Assessment, of this Petition.

Project energization was not affected by this Proposed Project Modification; therefore, SDG&E, in consultation with CPUC Staff, determined it was advantageous to wait until TL23071 was complete so current Light Detection and Ranging (“Lidar”) data could be obtained to confirm actual conductor tension and sag field conditions. The post construction Lidar information obtained after energization has allowed SDG&E engineering to more accurately verify sag and sway clearances along the existing 230-kV overhead transmission line spans that will be affected by the re-tensioning. Accordingly, pursuant to Rule 16.4(d) SDG&E explains this PFM could not have been presented within one year of the effective date of D.16-10-005 as TL23071 was not energized until August 29, 2018.

V. THE CPUC CAN PREPARE AN ADDENDUM TO THE FINAL EIR TO COMPLY WITH CEQA

The CPUC can prepare an Addendum to the Final EIR to analyze the Proposed Project Modification under CEQA because the conditions requiring a subsequent or supplemental EIR are not present. CEQA provides that when a lead agency has certified an EIR, “no subsequent

EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record,” that one or more of the following circumstances are present: (1) substantial changes to the project, (2) substantial changes to the project circumstances, or (3) new information of substantial importance. Cal. Code Regs. Tit. 14, § 15162(a); accord Cal. Pub. Res. Code § 21166. In each case, the circumstance must be accompanied by “new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” Cal. Code Regs. Tit. 14, § 15162(a). A supplemental EIR may be prepared only if the circumstances for a subsequent EIR exist. *Id.* § 15163.

A. None of the Conditions Requiring a Supplemental EIR Are Present

The California Court of Appeal has confirmed that a supplemental EIR “need not be prepared unless ‘[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.’” *Mani Brothers Real Estate Group, Inc. v. City of Los Angeles*, 153 Cal. App. 4th 1385, 1401-02 (2007). The court emphasized that changes to a project do not alone trigger the need for a supplemental EIR. *Id.* at 1398-1402. Instead, a supplemental EIR is only necessary when the changes will result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. *Id.*

The Proposed Project Modification does not constitute substantial changes to the Project that involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. *See id.*

Attachments B and D also indicate that the proposed activities to re-tension and sag the existing 230-kV overhead transmission line that extends from CC MM CP (cable pole structure already a part of the approved Project) south to the next dead-end structure (Z479040) will not change the determinations on aesthetics, air quality, noise or transportation and traffic impacts in the Final EIR.² CEQA therefore does not require a supplemental EIR.

B. An Addendum to the Final EIR Will Correctly Document CEQA Compliance

Since the conditions requiring a supplemental EIR are not present, an addendum to the Final EIR will correctly document CEQA compliance for the Proposed Project Modification. CEQA establishes that an addendum to a previously certified EIR satisfies CEQA when “some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” Cal. Code Regs. Tit. 14, § 15164(a).

The California Court of Appeal has recognized that an agency can satisfy CEQA by preparing an addendum when a supplemental EIR is not necessary. *Benton v. Bd. of Supervisors*, 226 Cal. App. 3d 1467, 1483-84 (1991); *Bowman v. City of Petaluma*, 185 Cal. App. 3d 1065, 1082 (1986). For example, the court has ruled that using an addendum to study relocation of a project was consistent with CEQA because relocation of the project would not cause significant environmental effects requiring a supplemental EIR. *Benton*, 226 Cal. App. 3d at 1483-84. In the absence of conditions triggering a supplemental EIR, an addendum was appropriate. *Id.*

Similarly, there are no conditions triggering a supplemental EIR for the Proposed Project Modification. The CPUC can therefore prepare an addendum to analyze the potential environmental impacts associated with the proposed activities to re-tension and sag the existing 230-kV overhead transmission line that extends from CC MM CP (cable pole structure already a

² Attachment B, MPR Request #8 at pp. 13-17, and Attachment D, Environmental Assessment, Section 3.

part of the approved Project) south to the next dead-end structure (Z479040) in compliance with CEQA.

VI. SPECIFIC WORDING CHANGES TO D. 16-10-005

Petitioners' proposed specific changes to 16-10-005 are described below:

Revised Findings of Fact

- **Add One New Finding of Fact**

11. “The Commission has prepared an addendum to the Environmental Impact Report to explain the proposed modifications as part of its consideration of this PFM”

Revised Conclusions of Law

1. The EIR and addendum ~~were as~~ completed in compliance with CEQA, and they ~~it~~ reflects the Commission's independent judgment and analysis on all material matters.

Revised Order

3. The Environmental Impact Report and addendum ~~are~~ is certified.

VII. CONCLUSION

Wherefore, SDG&E respectfully request that the CPUC expeditiously grant this Petition to modify D. 16-10-005 in accordance with the above.

DATED this 23rd day of January, 2019, at San Diego, California.

By: /s/ Allen K. Trial
Allen K. Trial

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ATTACHMENT A

Declaration of Jennifer L. Kaminsky

Jennifer L. Kaminsky declares the following:

I am San Diego Gas & Electric Company's Project Manager for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project and am authorized to make this Declaration on its behalf. I am informed and believe that the matters stated in the foregoing **PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E FOR MODIFICATION OF DECISION NO. 16-10-005 REGARDING THE SYCAMORE-PENASQUITOS 230 KILOVOLT TRANSMISSION LINE PROJECT** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true, and if called as a witness, could and would competently testify thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 23rd day of January, 2019, at San Diego, California.

/s/ Jennifer L. Kaminsky
Jennifer L. Kaminsky
Project Manager – Transmission & Distribution Projects

SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT B

Minor Project Refinement (MPR) #8

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

Proposed Minor Project Change Type:	Request #	Determination
Minor Project Refinement (MPR)	8	No Change

Part A: Proposed Minor Project Change Summary			
Date Submitted:	Requested Approval Date:	Start Date:	Expected End Date:
9/12/2017	9/19/2017	9/20/2017	10/20/2017
Submitted by:	Organization and Title:	Duration and Work Hours:	
Jennifer Kaminsky	SDG&E Environmental Project Manager	Refinement includes proposed temporary work areas to access 16 existing poles and 14 guard structure (GS) locations south of cable pole CC MM CP, use of existing access roads, and existing pads for pulling sites. Work areas would be established for the duration of construction anticipated to take approximately 2 weeks.	
Location(s): (Describe applicable location(s), address, and/or dimensions)			
<p>This proposed Minor Project Refinement (refinement) consists of adding temporary work area around 16 poles¹ (Z479040 through Z479055) and 14 guard structures (GS 19 through GS 32) south of Carroll Canyon Road and east of Interstate 805 (I-805). The refinement area extends approximately 2 miles south of CC MM CP. The proposed refinement is located in western San Diego County and partially within Marine Corps Air Station (MCAS) Miramar. Additional details on each area being requested under this proposed refinement are summarized below:</p>			
Temporary Work Area	Acres	Dimensions	ROW/Property Owner
Z479040	0.33	183' x 199'	MCAS Miramar
Z479041	0.26	121' x 92'	MCAS Miramar
			<p>Pole is on bare ground. The proposed work area contains potted nursery plants that will be temporarily relocated to accommodate construction activities at this location.</p> <p>Pole is on bare ground landscape/ornamental habitat and potted nursery plants. The proposed work area contains potted nursery plants that will be</p>

¹ Pole Z479055 and its associated temporary work area was included in the original Final Environmental Impact Report (referred to as Pole E49 in the FEIR) design but was not included in the Final Engineering Maps provided to the California Public Utilities Commission and not authorized under Notice to Proceed 3.

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				temporarily relocated to accommodate construction activities at this location.
Z479042	0.24	97' x 106'	MCAS Miramar	Pole is on bare ground. The proposed work area contains potted nursery plants that will be temporarily relocated to accommodate construction activities at this location.
Z479043	0.12	120' x 91'	MCAS Miramar	Pole is at the terminus of a spur road/work pad covered with disturbed habitat dominated by non-native grasses. Coastal sage scrub species have recruited within the disturbed work pad. The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded by coastal sage scrub/chaparral mix habitat.
Z479044	0.10	38' x 136'	MCAS Miramar	Pole is at the terminus of a spur road/work pad covered with disturbed habitat. The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded in all directions by coastal sage scrub/chaparral mix habitat.
Z479045	0.16	134' x 199'	MCAS Miramar	Pole is at the terminus of a spur road/work pad covered with disturbed habitat dominated by black mustard and non-native grasses. Coastal sage scrub species have recruited within the work pad from the immediate surrounding areas. The associated work area consists of the existing work pad, with a portion of disturbed habitat to the west of the work pad. The

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				pole and access road are surrounded on all sides by a mix of coastal sage scrub habitat.
Z479046	0.08	45' x 159'	MCAS Miramar	Pole occurs in bare ground immediately adjacent to a dirt access road. The associated work area consists of the existing access road to the west of the pole, with a portion of disturbed habitat to the north of the pole and along the adjacent access road, which is dominated by non-native grasses. The pole and access road are surrounded on all sides by a mix of disturbed habitat and coastal sage scrub habitat.
Z479047	0.16	120' x 164'	MCAS Miramar	Pole is within disturbed habitat. The work area consists of the existing dirt access road/work pad, with a portion of disturbed habitat to the south of the pole and along the adjacent access road.
Z479048	0.21	107' x 217'	MCAS Miramar	The pole and associated work area are within disturbed habitat dominated by non-native grasses and star thistle. The pole and access road are surrounded by coastal sage scrub/chaparral mix habitat and disturbed habitat.
Z479049	0.14	128' x 108'	MCAS Miramar	Pole is within disturbed habitat. The associated work area consists of the existing dirt access road/work pad, with a portion of coastal sage scrub habitat to the east. The pole and access road are surrounded by coastal sage scrub habitat and

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

				disturbed habitat.
Z479050	0.18	114' x 212'	MCAS Miramar	Pole is within disturbed habitat. The associated work area consists of the existing dirt access road, with a portion of coastal sage scrub habitat to the north of the pole and access road. The pole and access road are surrounded by a mix of coastal sage scrub/chaparral mix habitat and disturbed habitat. Several naturally occurring vernal pools occur east of the access road to this pole. However, this area will not be accessed for Project-related activities.
Z479051	0.25	77' x 198'	MCAS Miramar	Pole and the associated work area are on bare ground within an existing access road/work pad and are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat.
Z479052	0.09	123' x 90'	MCAS Miramar	Pole is within disturbed habitat. The associated work area consists of bare ground within the existing dirt access road to the north of the pole. The pole and access road are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat.
Z479053	0.22	117' x 121'	Eastgate Industrial Center Owners Association, Inc.	Pole is on bare ground. The associated work area consists of bare ground within the existing dirt access road/work pad. The pole and access road are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat.

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Z479054	0.10	50' x 134'	Eastgate Industrial Center Owners Association, Inc.	Pole is on bare ground. The associated work area consists of the existing dirt access road to the north of the pole and a portion of disturbed habitat beyond the road, which is dominated by non-native grasses and black mustard. The pole and access road are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat.
Z479055	0.06	66' x 69'	Eastgate Industrial Center Owners Association, Inc.	Pole is within disturbed habitat. The associated work area consists of the existing dirt access road to the southeast of the pole and includes portions of disturbed habitat south of the pole and east of the access road, which are dominated by non-native grasses and black mustard. The pole and access road are surrounded by disturbed habitat, as well as coastal sage scrub habitat and grassland habitat.

Guard Structure	Acres	Dimensions	ROW/Property Owner	Habitat/Land Cover
GS-19	0.04	75' x 25'	MCAS Miramar	Occurs within bare ground and is surrounded by bare ground, pavement, and potted nursery plants.
GS-20	0.04	75' x 25'	MCAS Miramar	Occurs within bare ground and is surrounded by bare ground, pavement, and potted nursery plants.
GS-21	0.03	54' x 30'	MCAS Miramar	Occurs within bare ground within an existing dirt spur road. The work area is needed to place two outriggers within coastal sage scrub/chaparral mix habitat. A Nuttall's scrub oak is located

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

				immediately south of the proposed outrigger area and the area is surrounded by coastal sage scrub/chaparral mix and disturbed habitat.
GS-22	0.05	52' x 80'	MCAS Miramar	Located within bare ground within an existing dirt access road and is immediately surrounded by riparian woodland and coastal sage scrub/chaparral mix habitat.
GS-23	0.03	50' x 25'	San Diego Metropolitan Transit Development Board	Occurs within bare ground within an existing dirt access road and includes work area on either side of the road for placement of two temporary direct-bury wooden poles and four outriggers and is surrounded by coastal sage scrub and disturbed habitat.
GS-24	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and includes areas on the south side of the road for placement of two temporary direct-bury wooden poles and is surrounded by coastal sage scrub and disturbed habitat.
GS-25	0.02	26' x 26'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and includes areas on either side of the road for placement of four outriggers and is surrounded by coastal sage scrub.
GS-26	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground immediately south of the sidewalk on the eastbound side of Nobel

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

				Drive and is surrounded to the north by pavement and to the south by coastal sage scrub and disturbed habitat.
GS-27	0.04	75' x 30'	MCAS Miramar	Occurs within disturbed habitat immediately north of the sidewalk on the westbound side of Nobel Drive and is surrounded to the south by pavement and to the north by coastal sage scrub and disturbed habitat.
GS-28	0.002	10' x 10'	MCAS Miramar	Located within the work area associated with pole Z479049.
GS-29	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and is surrounded by coastal sage scrub and disturbed habitat. Road ruts that could support vernal pool species occur approximately 15 feet south of the pole. These areas will be flagged for avoidance during construction.
GS-30	0.04	50' x 58'	MCAS Miramar	Occurs within disturbed habitat and is surrounded by disturbed and coastal sage scrub habitat to the south, and Eastgate Mall Road to the north.
GS-31	0.03	50' x 25'	Eastgate Industrial Center Owners Association, Inc.	Occurs within disturbed habitat and is surrounded to the south by Eastgate Mall Road, and to the north by disturbed and coastal sage scrub habitat.
GS-32	0.03	50' x 25'	Eastgate Industrial Center Owners Association, Inc.	Occurs east of a dirt access road within disturbed habitat and is surrounded by disturbed and coastal sage scrub habitat.

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

Proposed Action(s): (List and describe each proposed action)

Under this proposed refinement, SDG&E seeks to add approximately 2.7 acres of additional temporary work space (as described above and identified in Attachment 1 and Attachment 2) in order to re-tension and sag the existing 230-kilovolt (kV) overhead circuit south of cable pole CC MM CP. In addition, SDG&E seeks to add 0.43 acre of temporary work space for guard structure installation to support the work. The total additional temporary work space being requested in this proposed refinement is 3.12 acres, which consists primarily of impacts to non-sensitive disturbed/ornamental areas. Of the 3.12 acres of additional temporary impact area, there are approximately 0.04 acre of habitat impacts anticipated (1,719 square feet to coastal sage scrub and 16 square feet to coastal sage scrub/chaparral mix habitat).

Limited ground disturbance will occur associated with installation of guard structures. Minor vegetation clearing and trimming is also proposed as needed along access roads, around existing pads, and at guard structures to minimize potential fire risk and facilitate equipment/vehicle access. No grading is proposed.

As part of the proposed refinement, SDG&E and its contractors may perform the following activities within the proposed refinement areas:

- Use of existing access roads and pads;
- Placement of steel metal plates with cribbing material spanning the access road across Rose Creek to prevent impacts to jurisdictional waters;
- Vegetation clearing and trimming around existing roads and pads;
- Re-tension and sag the existing 230 kV line from CC MP CP south to the next dead-end structure (Z479040) consisting of 16 poles and 16 spans;
- Use of the temporary work space and access road at the next dead-end structure (Z479040) as pull site;
- Removal and replacement of existing dampers and wire clips;
- Use of standard traffic control methods where stringing occurs across public access roadways and railroads;
- Installation of 14 temporary guard structures to prevent any dropped conductor from coming into contact with pedestrians, vehicles, or utilities (e.g., distribution lines and communication facilities) located beneath the wire; and
- Performance of other work activities necessary to comply with Project requirements (e.g., watering for dust control).

Two types of guard structures would be used. A guard structure may be constructed of wood poles embedded in the ground with a cross-beam. In this case, holes would be augured into the ground (direct-bury) for the wood poles. A crane or a line truck would then lift the wood poles into place. Netting may be suspended between guard structures for larger crossings or an additional pole will be installed across the top of the two poles to guard resources. Wood guard structures would be removed after stringing, and the augured holes would be backfilled with the excavated soil. Alternatively, a boom truck or bucket truck may be used as a guard structure; this option is typically used in paved areas. Guard structures may also be installed utilizing temporary supports (i.e., flower pots, which are large concrete bases that support the vertical poles of a guard structure). In some locations, a bucket truck will be utilized to install rubber insulating blankets at distribution line crossings. No foundations would be needed and no grading would occur for installation of guard structures.

Work associated with this proposed refinement will take approximately 2 weeks. The use of the proposed refinement areas would not result in any new impacts or substantially increase the severity of a previously analyzed impact as identified in the Project's Final Environmental Impact Report (FEIR).

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Purpose(s): (Explain why the proposed action(s) are necessary)

The proposed refinement is necessary to properly re-tension and sag the wire for the portion of the existing 230 kV transmission line that extends from CC MM CP south to the next dead-end structure (Z479040). Proper sag-tension on the line is needed to ensure that line clearances and load on the poles are maintained during varying wind, temperature, and weather conditions. The proposed refinement areas are needed to provide the necessary work space to unclip, pull, and reclip the existing conductor strung between structures Z479040 and Z479055, and to provide the appropriate space to install guard structures in areas where the conductor crosses existing roads, railroads, distribution lines, and other sensitive features.

Part B: Existing Conditions

Current and Adjacent Land Use(s):

The proposed temporary work areas and guard structures are located south of cable pole CC MM CP and Carroll Canyon Road, east of I-805, and north of California State Highway 52. Immediately surrounding the temporary work spaces and guard structure locations are areas of contiguous open space. The temporary work areas and associated access roads in this proposed refinement are located in disturbed/developed areas currently used by SDG&E's Transmission Construction and Maintenance (TCM) crews for Operation and Maintenance (O&M) activities.

Has landowner approval been granted? <i>(Describe below)</i>			Landowner:	Date of Approval:	Approval Verified by:
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A	Various (MCAS Miramar, San Diego Metropolitan Transit Development Board, and Eastgate Industrial Center Owners Association Inc.)	N/A	Sean Quinn, SDG&E Land Services

The proposed refinement areas are located within SDG&E right-of-way (ROW) on MCAS Miramar, San Diego Metropolitan Transit Development Board property, and Eastgate Industrial Center Owners Association Inc. property. Access and all work on the existing line are covered under SDG&E's easement rights. No additional property owner approvals are required. However, SDG&E will provide the appropriate notifications to MCAS Miramar regarding Project construction activities within their property as necessary. The contractor will coordinate with Eastgate Industrial Center Owners Association Inc. for access and work in Z479053, Z479054, Z479055, GS-31, and GS-32. Additionally, SDG&E and the contractor will coordinate with Village Nurseries Wholesale, LLC, who leases the land from MCAS Miramar at locations Z479040, Z479041, Z479042, GS 19, and GS 20 to accommodate proposed construction activities.

Surveys (List any new survey reports under Part D, attach a copy, and describe relevant survey details under the applicable resource category listed in the Part E)

Biological Resources. Were all sites associated with the proposed action(s) surveyed for biological resources with the potential to occur in the area? If so, were survey results positive or negative? Were surveys completed during the appropriate timing and season	<input type="checkbox"/> Previously Surveyed	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative
	<input checked="" type="checkbox"/> Survey Attached <i>(Attachment 3)</i>	

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<p>to detect resources? (If not, describe under the applicable resource category in Part E)</p> <p><i>The proposed refinement areas were surveyed by a CPUC-approved biologist. The results of the survey are provided in Attachment 3. The proposed refinement areas are primarily disturbed/developed areas. Minor vegetation clearing and trimming is proposed (shrub, weed, and non-native grasses) as needed to minimize potential fire risk, install poles, and accommodate equipment, with total estimated impacts to sensitive habitat of 0.04 acre (see Attachment 3: Pre-Activity Survey Report submitted in compliance with MM Biology-1c for the CPUC's review and approval).</i></p> <p><i>All temporary workspace areas will be clearly delineated with lathe and flagging to ensure construction personnel stay within approved Project limits. A biological monitor will be present during the use of the temporary work spaces and guard structures to minimize impacts and prevent impacts to sensitive species.</i></p> <p><i>San Diego fairy shrimp are known to occur in the vicinity of the proposed refinement area. To prevent potential impacts to San Diego fairy shrimp, no vehicles will be permitted to drive off paved roads on MCAS Miramar for at least 72 hours after a significant rainfall event that has the potential to generate pools and create road rutting conditions. No grading activities are anticipated under this proposed refinement, therefore no impacts to vernal pools or San Diego fairy shrimp are anticipated.</i></p> <p><i>San Diego goldenstar has the potential to occur within the vicinity of GS-23 and GS-28. To prevent potential impacts to San Diego goldenstar at GS-23 and GS-28, guard structures will be installed using temporary supports (large concrete bases that support the vertical poles of a guard structure) or bucket trucks to avoid subsurface disturbance.</i></p>	<p><input type="checkbox"/> N/A Proposed refinement area is paved and developed.</p>				
<p>Cultural Resources. Were all sites associated with the proposed action(s) surveyed for cultural resources (records search and pedestrian survey)? If so, were survey results positive or negative?</p> <p><i>A cultural resource study of the proposed refinement area was completed in August 2017. The study included a records search, a desktop review, and a pedestrian survey of locations that had not been previously surveyed. A records search extending 0.25 miles beyond the proposed refinement area was performed by SDG&E and results were provided to AECOM. A pedestrian survey was completed on August 17, 2017, for the three temporary work areas (Z479053, Z479054, and Z47905) located outside of MCAS Miramar and on August 25, 2017, for three guard structures (GS 31, GS 32, and GS 33) located outside of MCAS Miramar. Pedestrian surveys were not conducted for temporary work areas located within MCAS Miramar as MCAS Miramar is considered 100 percent inventoried</i></p>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:70%; padding: 2px;"><input type="checkbox"/> Previously Surveyed</td> <td style="width:30%; padding: 2px;"><input checked="" type="checkbox"/> Positive</td> </tr> <tr> <td style="padding: 2px;"><input checked="" type="checkbox"/> Survey Attached (Attachment 4)</td> <td style="padding: 2px;"><input type="checkbox"/> Negative</td> </tr> </table> <p><input type="checkbox"/> N/A. Proposed refinement area is paved and developed.</p>	<input type="checkbox"/> Previously Surveyed	<input checked="" type="checkbox"/> Positive	<input checked="" type="checkbox"/> Survey Attached (Attachment 4)	<input type="checkbox"/> Negative
<input type="checkbox"/> Previously Surveyed	<input checked="" type="checkbox"/> Positive				
<input checked="" type="checkbox"/> Survey Attached (Attachment 4)	<input type="checkbox"/> Negative				

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and a further cultural resource survey of MCAS property is not necessary. However, a desktop review of the proposed refinement areas on MCAS Miramar was performed. The desktop review occurred for Z479040 through Z479055, GS19 through GS22, and GS24 through GS30. The results of the cultural resource study are provided in Attachment 4. The study was positive and resulted in the update of two cultural resources (CA-SDI-10250 and P-37-024739) and the recording of one new isolate (SXPQ-I-2).

The isolate is not eligible for the California Register of Historical Resources (CRHR) due to its limited research value. The isolate is located outside of the proposed refinement areas and will not be impacted. CA-SDI-10250 has been subject to archaeological testing and was previously recommended as not eligible for the CRHR. The site will be avoided during construction. An Environmentally Sensitive Area (ESA) boundary will be established at the site prior to work beginning. Resource P-37-024739 (railroad) is a segment of a National Register of Historic Places (NRHP) eligible resource and will be avoided during construction activities. Signage will be established at P-37-024739 if the signage is outside of the railroad's foul zone and does not impede public safety. The three resources will be avoided during construction. All resources will be recorded or updated on the appropriate Department of Parks and Recreation 523 forms and submitted to the South Coastal Information Center at the completion of the project.

In accordance with MM Cultural Resources-1, monitoring by an archaeological monitor and a Native American monitor will be implemented if ground disturbance is required at GS-22, GS-23, GS-24, and GS-25 and for initial set up at pole Z47905.

A paleontological resource study was completed in August 2017. The study included a records search and literature review conducted by the San Diego Natural History Museum; Paleo Solutions reviewed the results and performed an analysis of potential impacts to paleontological resources. The results of the study showed that no previously recorded fossil localities are within the work areas although six have been found within a 0.25-mile radius of the temporary work areas. Geological maps were reviewed to determine which geologic units are present within the proposed refinement areas. Four formations were identified: Holocene alluvial floodplain deposits, Lindavista Formation, Friars Formation, and Scripps Formation. The Scripps and Friars Formations have a high potential for paleontological resources, while the Lindavista Formation has a moderate sensitivity level. Excavations within these formations will be monitored.

In accordance with MM Paleontology-1 and MM Paleontology-3, monitoring by a paleontological monitor will be implemented if ground disturbance is required at GS-19 to GS21, GS-24, and GS-26 to GS-21.

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<p>Hydrology. Were all sites associated with the proposed action(s) surveyed for hydrologic resources? If so, were survey results positive or negative?</p> <p><i>The appropriate best management practices (BMPs) will be implemented in accordance with the Project Storm Water Pollution Prevention Plan (SWPPP) to prevent any unauthorized non-stormwater discharges on the Project.</i></p> <p><i>The access road between poles Z479044 and Z479045 crosses Rose Creek as shown in Attachment 1, sheets 5 and 6. To facilitate vehicle and equipment travel through this area, the contractor will install metal plates with cribbing material across the creek bed. A qualified wetland biologist conducted a field assessment on August 31, 2017 to identify the outer limits of potential jurisdictional waters to be avoided during construction. The outer limits of these waters will be clearly marked by the qualified wetland biologist prior to plate installation, and installation will be monitored by a CPUC approved biologist to prevent impacts to jurisdictional waters.</i></p> <p><i>The proposed refinement would not result in any new impacts or increase the severity of a previously analyzed impact on hydrology as identified in the FEIR.</i></p>	<input checked="" type="checkbox"/> Previously Surveyed <input type="checkbox"/> Survey Attached	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative
<input type="checkbox"/> N/A. Proposed refinement area is paved and developed.		

Part C: Permits, Agency Approvals, and Environmental Protection Measures (EPMs) (List any new permits or agency approvals under Part D, attach a copy, and describe relevant details under the applicable resource category listed in Part E)		
Have all required permits, permit amendments/authorizations, or agency approvals been issued by resource agencies with applicable jurisdiction?	<input type="checkbox"/> Previously Provided <input type="checkbox"/> Authorization Attached <input type="checkbox"/> Pending – Tier 1 CLAMP permit pending approval by MCAS Miramar <input checked="" type="checkbox"/> N/A – no new permit not previously identified in the FEIR would be needed.	
Would the proposed action(s) conflict with permit conditions or agency approvals?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Would the proposed action(s) conflict with project applicant proposed measures, avoidance and minimization measures, or mitigation measures listed in Final EIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Part D: Attached Materials: (e.g., surveys, maps, photos, memos, agency authorizations, etc.)
Attachment 1: MPR Area Map Attachment 2: Photographs Attachment 3: Biological Pre-Activity Survey Attachment 4: Cultural Survey Memorandum

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Attachment 5: Paleontological Records Search Memorandum

Complete the Final EIR Consistency Checklist below (Part E) and answer the consistency questions for each resource category. Include a description and justification below each resource category, as necessary. The consistency questions were developed using the CEQA Checklist provided in the Final EIR. Refer to the Final EIR for the details on the project impact evaluation.

Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Aesthetics (e.g., damage scenic resources or vistas, degrade the existing visual character of the site and its surroundings, or create sources of light or glare)? <i>Final EIR evaluation: Significant and unavoidable</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Aesthetics: Under the proposed refinement, the existing 230 kV circuit supported by 16 existing structures south of CC MM CP will be re-tensioned. No new structures or new conductor will be installed. As a result, no new impacts to aesthetics would occur as a result of the refinement.			
Agriculture and Forestry Resources (e.g., convert Farmland to nonagricultural use, or create a conflict with existing agricultural zoning or a Williamson Act)? <i>Final EIR evaluation: Less than significant</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Agricultural and Forestry Resources: The proposed refinement is not located on agricultural land and would not convert agricultural land to non-agricultural use or result in the loss of agricultural land. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on agricultural or forestry resources as identified in the FEIR.			
Air Quality (e.g., produce additional emissions, or expose sensitive receptors to additional pollutants)? <i>Final EIR evaluation: Significant and unavoidable</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Air Quality: The type of equipment and duration of construction activities associated with this proposed refinement are consistent with those discussed in the FEIR. Impacts Air-1, Air-2, and Air-3 will remain significant and unavoidable after mitigation. Impacts Air-4 and Air-5 will remain less than significant and require no mitigation. The proposed refinement would not result in any new impacts or increase the severity of a previously analyzed impact on air quality as identified in the FEIR.			

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Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Biological Resources (e.g., cause an adverse effect to sensitive or special-status species, or impact riparian, wetland, or any other sensitive habitat, or conflict with local policies or ordinances protecting biological resources)?</p> <p><i>Final EIR evaluation: Less than significant with mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Biological Resources:</p> <p>This refinement would involve work primarily within previously disturbed/developed areas used by SDG&E's Transmission Construction and Maintenance (TCM) crews to conduct Operation and Maintenance (O&M) activities. Approximately 1,719 square feet to coastal sage scrub and 16 square feet to coastal sage scrub/chaparral mix habitat) would be temporarily impacted as a result from guard structure installation activities. The temporary impact areas associated with the guard structures would vary in size and would be caused by staging of bucket trucks, placement of outriggers, and placement of temporary direct-bury poles.</p> <p>Impacts to these sensitive vegetation communities were analyzed in the FEIR and would be mitigated in accordance with MM Biology-6, and in accordance with SDG&E's NCCP. All temporary impacts associated with this proposed refinement will be restored in accordance with the Project's Habitat Restoration Plan. The Habitat Restoration Plan acknowledges the potential for minor changes in impact areas, and requires preparation of a Post-Construction Report to confirm actual impacts at each work area. It includes provisions for restoration of temporary impacts to the sensitive vegetation communities associated with this proposed refinement, and would be implemented for MPR areas with unavoidable impacts to sensitive habitats. Further details regarding mitigation and temporary impacts are included in Attachment 3. No permanent impacts are anticipated as a result of this refinement.</p> <p>An existing SDG&E access road to GS-23 intersects Rose Creek. GS-23 is located approximately 150 feet north of Rose Creek (Creek). Crews will install metal plates with cribbing material across the Creek so that construction vehicles and equipment can cross the Creek without impacting jurisdictional resources. A CPUC-approved biologist will be present during the installation of the metal plates to ensure the plates are placed on the outer limits of potential jurisdictional waters and will be present to monitor activities at GS-23. No impacts to jurisdictional waters are anticipated with this method of crossing.</p>			
<p>Cultural and Paleontological Resources (e.g., cause adverse change to a historical, archeological, or paleontological resource)?</p> <p><i>Final EIR evaluation: Less than significant with mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:</p> <p>A cultural resource study was conducted in August 2017 and included a records search, a desktop review, and a pedestrian survey. A records search extending 0.25 miles beyond the refinement areas was completed in August 2017. AECOM completed a pedestrian survey on August 17, 2017, for the three temporary work areas (Z479053, Z479054, and Z47905) located outside of MCAS Miramar and on August 25, 2017, for three guard structures (GS 31, GS 32, and GS 33) located outside of MCAS Miramar. Results of the survey and records search are provided in Attachment 4. The cultural resource study was positive and resulted in the update of two cultural resources (CA-SDI-10250 and P-37-024739) and the recording of one new isolate (SXPO-I-2). Resources will be avoided during construction. These findings do not result in a significant change from findings in the FEIR. With implementation of MM Cultural-1, impacts to these resources would be less than significant.</p>			

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Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>A paleontological resource study, which included a records search and literature review of the refinement areas, was completed in August 2017. The results of the study showed that no previously recorded fossil localities are within the work areas although six have been found within a 0.25-mile radius of the temporary work areas. Additionally, the literature review identified that excavations would take place within moderate to high potential formations. The results of the paleontological study are provided in Attachment 5. The proposed refinement has the potential to result in impacts to paleontological resources during direct bury of the guard structure poles; however, through the implementation of MM Paleontology-1 and MM Paleontology-3, impacts to these resources would be less than significant.</p> <p>Through implementation of MM Cultural-1, MM Paleontology-1, and MM Paleontology-3, impacts to historical, archaeological, or paleontological resources will remain less than significant with mitigation. The proposed refinement would not result in new impacts or increase in the severity of a previously identified impact on cultural and paleontological resources as identified in the FEIR.</p>			
<p>Geology and Soils (e.g., cause or expose people or structures to geologic or soil hazards, including erosion or loss of topsoil)? <i>Final EIR evaluation: Less than significant with mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Geology and Soils: The proposed refinement is located in an area previously surveyed for geological hazards as described in the geotechnical reports submitted to the CPUC on November 18, 2016, and as analyzed in the FEIR. Based on those reports, there is no or low potential for liquefaction or landslide-related impacts. In addition, ground-disturbing activities are limited to the installation of guard structures along an existing transmission corridor. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on geologic resources as identified in the FEIR.</p>			
<p>Greenhouse Gases (e.g., generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment)? <i>Final EIR evaluation: Less than significant with mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases: The type of equipment and duration of construction activities associated with this proposed refinement are consistent with those discussed in the FEIR. Construction activities associated with this proposed refinement will last approximately 2 weeks. Use of the following pieces of construction equipment is anticipated:</p> <ul style="list-style-type: none"> ○ Two 95- to 125-foot rubber-tired bucket trucks ○ Two 35- to 50-ton cranes with basket ○ One Sag Cat ○ Two transmission line trucks ○ One flatbed trailer ○ One semi-tractor ○ Four F550 framers ○ One 4,000-gallon-capacity water truck <p>The short-term use of this construction equipment will not result in a substantial increase in greenhouse gas</p>			

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Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
emissions above those described in the FEIR. Impact GHG-1 would remain less than significant without mitigation and GHG-2 would remain less than significant with mitigation. The proposed refinement would not result in a new impact or substantially increase the severity of a previously analyzed impact for greenhouse gases as identified in the FEIR.			
Hazards and Hazardous Materials (e.g., create or increase the exposure of people or structures to hazardous materials or wildland fires, involve the use of additional hazardous materials or equipment, or interfere with an adopted emergency plan)? <i>Final EIR evaluation: Less than significant with mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Hazards and Hazardous Materials: The proposed refinement would utilize the same types of equipment and hazardous materials and will not interfere with the adopted emergency plan as analyzed in the FEIR and described in the Hazard Substance Control and Emergency Response Plan approved by the CPUC on November 14, 2016. The proposed refinement is located within the same fire hazard area as the FEIR design, and the potential for fire ignition would remain less than significant with mitigation. Work in the refinement areas will be conducted in accordance with the revised Construction Fire Prevention Plan approved by the CPUC on July 19, 2017. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact relating to hazards and hazardous materials as identified in the FEIR.			
Hydrology and Water Quality (e.g., degrade water quality, discharge waste or sediment, deplete groundwater, alter the existing drainage pattern, create additional runoff water or polluted runoff, place structures in a 100-year flood hazard area, or expose people or structures to a significant risk involving flooding)? <i>Final EIR evaluation: Less than significant with mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality: The proposed refinement is within a previously disturbed area that is located within the Peñasquitos Watershed and is located in an area previously surveyed for hydrological resources in the FEIR. The proposed refinement area would include the temporary crossing of Rose Creek located south of GS 23. To facilitate construction, crews will install metal plates with cribbing material across the creek bed to cross the creek without impacting jurisdictional resources. The refinement would remain consistent with the impacts to hydrological resources and water quality analyzed in the FEIR. Therefore, impacts associated with the proposed refinement would remain less than significant with mitigation and would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality as identified in the FEIR.			
Land Use (e.g., conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the project, or conflict with a habitat conservation plan)? <i>Final EIR evaluation: No impact</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Land Use: The proposed refinement would not change the "no impact" determination under any of the three significance criteria for land use and planning (Impacts Land- 1, Land-2, and Land-3) identified in the FEIR and would not result in a new impact or increase the severity of a previously analyzed impact on land use.			

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Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Noise (e.g., expose sensitive receptors to additional noise or vibration)? <i>Final EIR evaluation: Significant and unavoidable</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Noise: Activities associated with construction and utilization of the proposed refinement areas (such as use of heavy equipment) are consistent with those discussed in the FEIR. Therefore, temporal impacts associated with construction noise would remain significant and unavoidable. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on noise as identified in the FEIR.			
Public Services (e.g., result in adverse impacts to government facilities that provide public service, such as fire protection, police protection, schools, and parks)? <i>Final EIR evaluation: Less than significant with mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Public Service The proposed refinement may result in lane closures on public roads or otherwise affect public services during guard structure installation activities. However, through the implementation of MM Traffic-6, the proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on public services identified in the FEIR.			
Recreation (e.g., increases the use of, or cause adverse effects to, parks or other recreational facilities)? <i>Final EIR evaluation: Less than significant with mitigation</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Recreation: The proposed refinement is not located within a park, preserve, or trail. The refinement area is in the same area as the FEIR and would not impact parks or recreational facilities. Therefore, the proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on recreation as identified in the FEIR.			
Transportation and Traffic (e.g., increase traffic congestion or degrade performance of the circulation system, taking into account all modes of transportation, or increase hazards due to a design feature)? <i>Final EIR evaluation: Significant and unavoidable</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Part E: Final EIR Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:</p> <p>The proposed refinement would involve a slight increase in additional construction vehicles (1 to 2 at each work location for the day) and personal vehicles (approximately 3 to 4 passenger vehicles in a given location) during proposed construction activities. However, the proposed work is short term (approximately 2 weeks) and would occur primarily on existing developed private access roads not accessible to the public. The refinement would not result in a substantial increase in vehicle traffic, or lane closure, nor would it result in the loss of parking consistent with the analysis in the FEIR. Helicopters will not be used as part of the proposed refinement. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on transportation and traffic as identified in the FEIR.</p>			
<p>Utilities and Service Systems (e.g., result in construction of new, or expansion of existing, water facilities, stormwater drainage facilities, require additional water entitlements, or creation of new solid waste disposal needs)?</p> <p><i>Final EIR evaluation: Less than significant with mitigation</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Summary of Proposed Minor Project Refinement Impacts on Utilities and Service Systems:</p> <p>The proposed refinement would not involve the construction of new, or expansion of existing, water facilities, stormwater drainage facilities, and/or require water entitlements, or creation of new solid waste disposal needs. The proposed refinement would not result in a new impact or increase the severity of a previously analyzed impact on utilities and service systems.</p>			

MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

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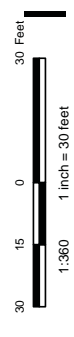
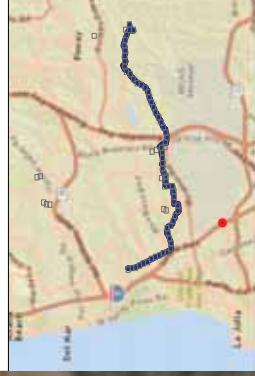
MINOR PROJECT REFINEMENT NO. 8 REQUEST FORM

Attachment 1: MPR Area Map



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



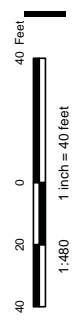
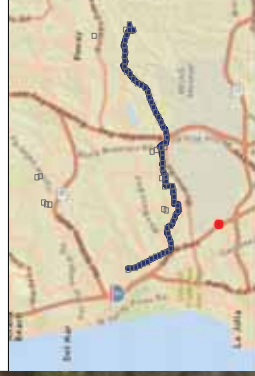
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479040**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



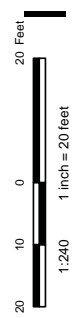
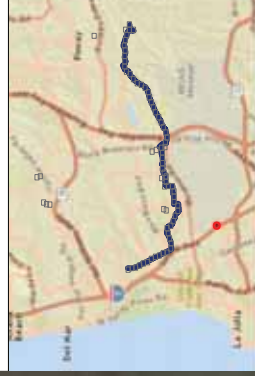
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479041**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



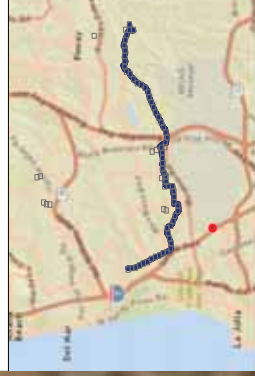
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479042**





Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



20 10 0 20 Feet
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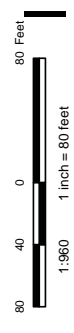
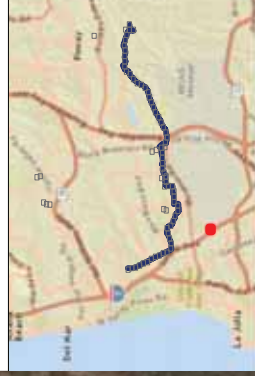
**Sycamore to Peñasquitos
 230kV Transmission Line Project
 Proposed Refinement Area - MPR 8
 Z479043**

9/1/2017

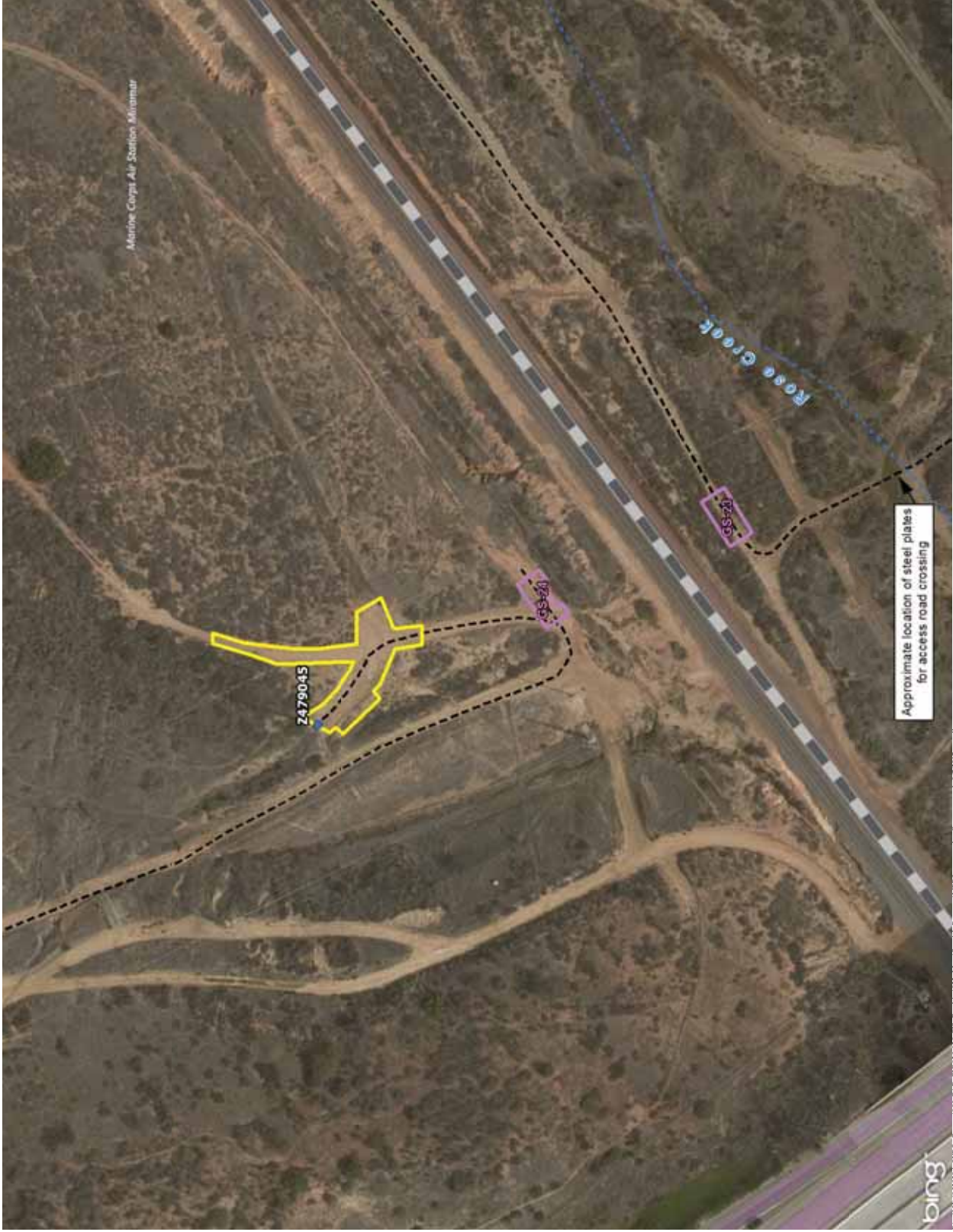


Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- NHD Blue Line Stream

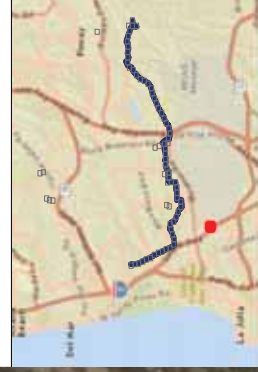


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479044**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- - - NHD Blue Line Stream



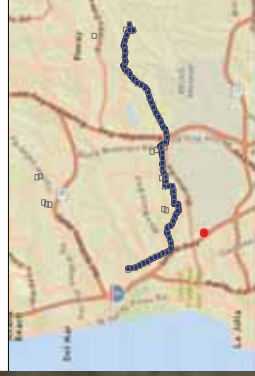
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479045**

9/7/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



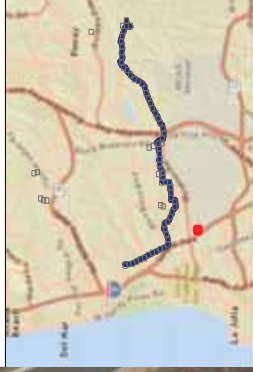
25 12.5 0 25 Feet
1:300 1 inch = 25 feet

**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479046**



Legend

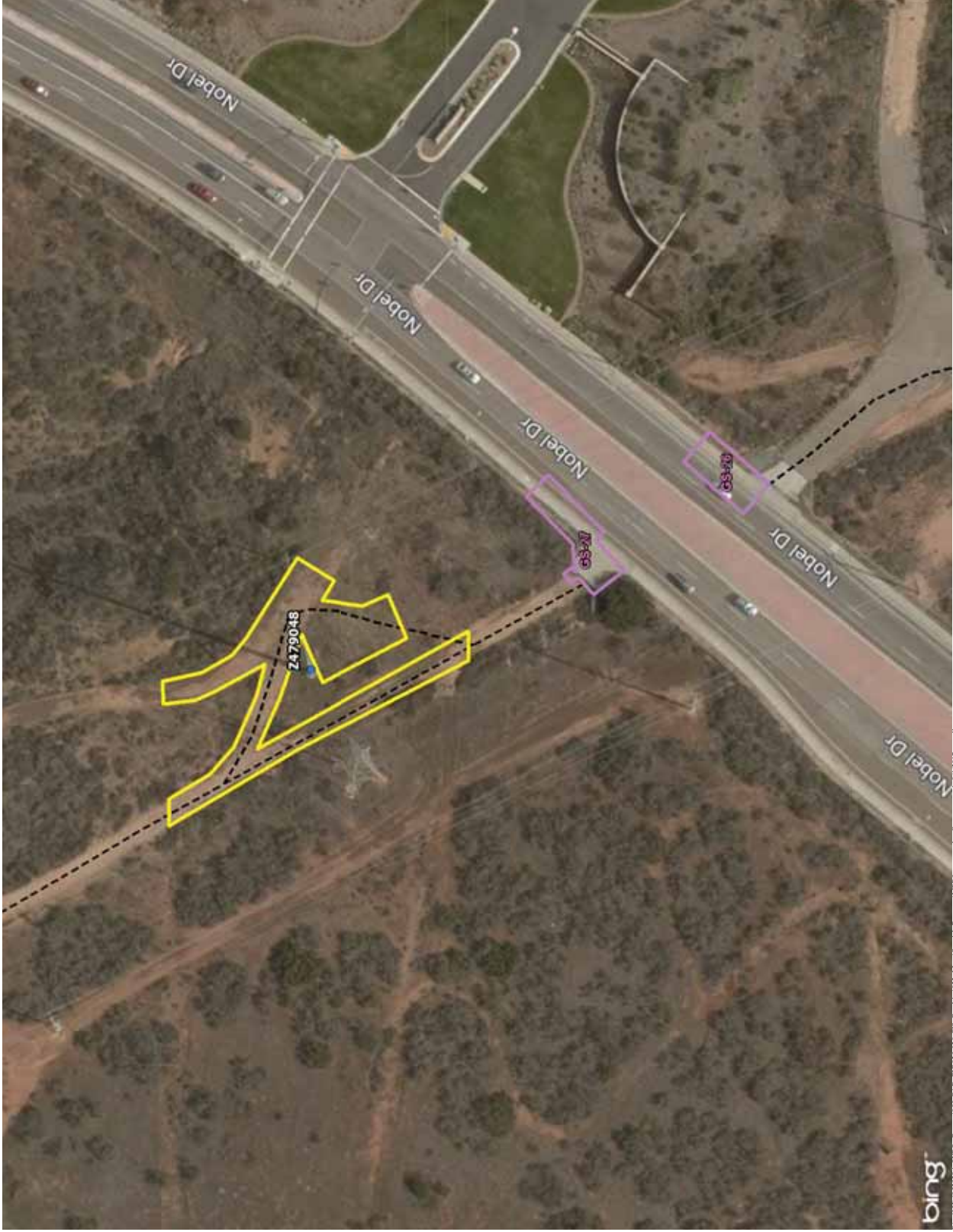
- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



60 Feet
0 30 60
1:720 1 inch = 60 feet

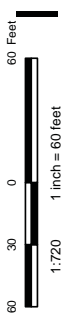
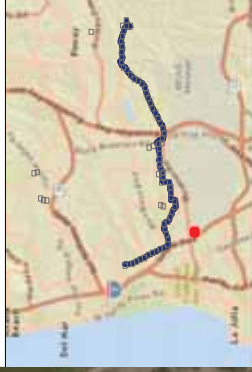
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479047**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure

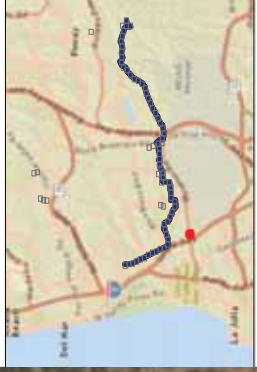


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479048**

9/1/2017



- Legend**
- (MPR 8 Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure



50 25 0 50 Feet
 1:600 1 inch = 50 feet

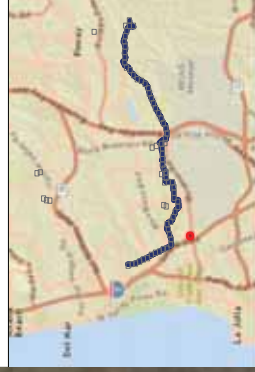
**Sycamore to Peñasquitos
 230kV Transmission Line Project
 Proposed Refinement Area - MPR 8
 Z479049**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area

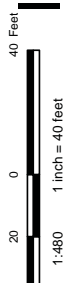
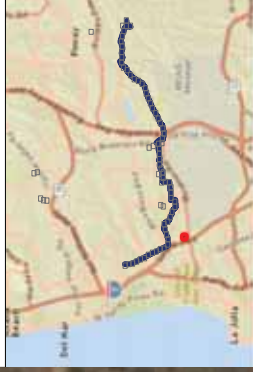


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479050**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



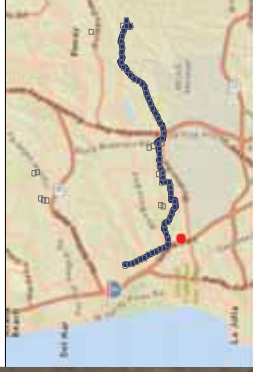
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479051**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



40 20 0 40 Feet
1:480 1 inch = 40 feet

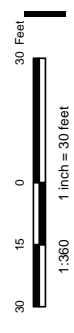
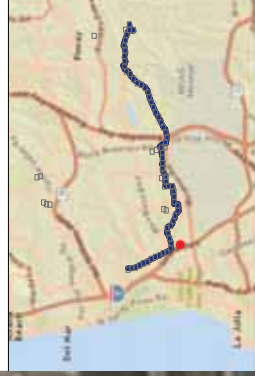
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479052**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area

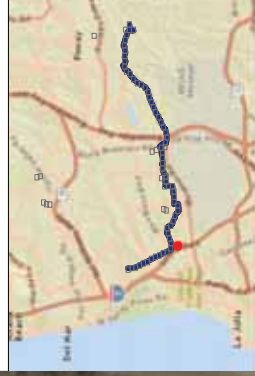


**Sycamore to Peñasquitos
230 kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479053**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure

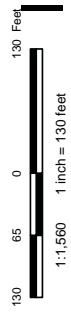
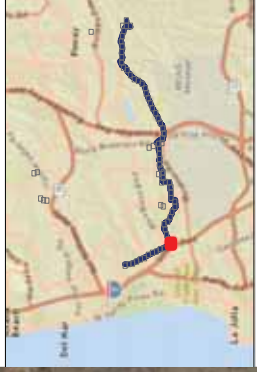


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479054**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- FEIR Work Area
- Stations
- Segment B**
- Segment 5, Section 1
- Segment 5, Section 2
- AC Mitigation Location
- Retaining Wall
- Permanent Impact
- Underground Vault
- Approved Temporary Work Space



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479055**

9/7/2017

Attachment 2: Photographs

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 1. North-facing view of Z479040.



Photo 2. East-facing view of dirt access road from Village Nursery to Z479040.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 3. North-facing view of Z479041.



Photo 4. East-facing view of dirt access road from Village Nursery to Z479041.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 5. West-facing view of Z479042.



Photo 6. South-facing view of dirt access road from Village Nursery to Z479042.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 7. Northeast-facing view of Z479043.



Photo 8. Southwest-facing view of spur road to Z479043 off dirt access road from Village Nursery.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 9. North-facing view of Z479044.



Photo 10. South-facing view of spur road to Z479044 off of dirt access road from Village Nursery.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 11. Northwest-facing view of Z479045.



Photo 12. Northwest-facing view of work area at Z479045.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 13. South-facing view of spur road to Z479045 off dirt access road off of Nobel Drive.



Photo 14. East-facing view of Z479046.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 15. North-facing view of dirt access road off Nobel Drive to Z479046 and portion of work area.



Photo 16. Southwest-facing view of Z479047.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 17. West-facing view of work area associated with Z479047.



Photo 18. Southwest-facing view of Z479048.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 19. North-facing view of work area associated with Z479048.



Photo 20. South-facing view of dirt access road off of Nobel Drive to Z479048.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 21. North-facing view of Z479049.



Photo 22. North-facing view of work area associated with Z479049.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 23. North-facing view of dirt access road off of Miramar Road to Z479049.



Photo 24. Southwest-facing view of Z479050.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 25. East-facing view portion of work area at Z479050.



Photo 26. South-facing view of dirt access road off of Miramar Road to Z479050.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 27. West-facing view of Z479051.



Photo 28. Southeast-facing view of dirt access road off of Miramar Road to Z479051.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 29. Northwest-facing view of Z479052.



Photo 30. North-facing view of dirt access road off of Eastgate Mall Road leading to Z479052.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 31. West-facing view of Z479053.



Photo 32. South-facing view of dirt access road off of Eastgate Mall Road leading to Z479053.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 33. Northeast-facing view of Z479054.



Photo 34. Northeast-facing view of portion of work area at Z479054.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 35. Southwest-facing view of dirt access road off of Eastgate Mall Road to Z479054.



Photo 36. Northwest-facing view of Z479055.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 37. South-facing view of dirt access road off of Eastgate Mall Road to Z479055 and a portion of the work area at Z479055.



Photo 38. South-facing view of GS-19 (yellow arrows indicate pole locations).

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 39. Northwest-facing view of GS-20 (yellow arrows indicate pole locations).



Photo 40. East-facing view of GS-21.

PHOTO DOCUMENT

Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 41. East-facing view of north outrigger area for GS-21.



Photo 42. South-facing view of south outrigger area for GS-21.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 43. East-facing view of pedestrian access to distribution pole associated with GS-21.



Photo 44. Aerial view of GS-22.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 45. East-facing view of GS-23.



Photo 46. North-facing view of west pole location for GS-23.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 47. North-facing view of east pole location for GS-23.



Photo 48. West-facing view of west pole location for GS-24.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 49. West-facing view of east pole location for GS-24.



Photo 50. Aerial view of GS-25.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 51. East-facing view of GS-26 (yellow arrows indicate pole locations).



Photo 52. North-facing view of northwest pole location for GS-27.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 53. Northeast-facing view of southeast pole location for GS-27.



Photo 54. North-facing view of west pole location for GS-28.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 55. North-facing view of east pole location for GS-28.



Photo 56. Northwest-facing view of GS-29 (yellow arrows indicate pole locations).

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 57. Aerial-view of GS-30.

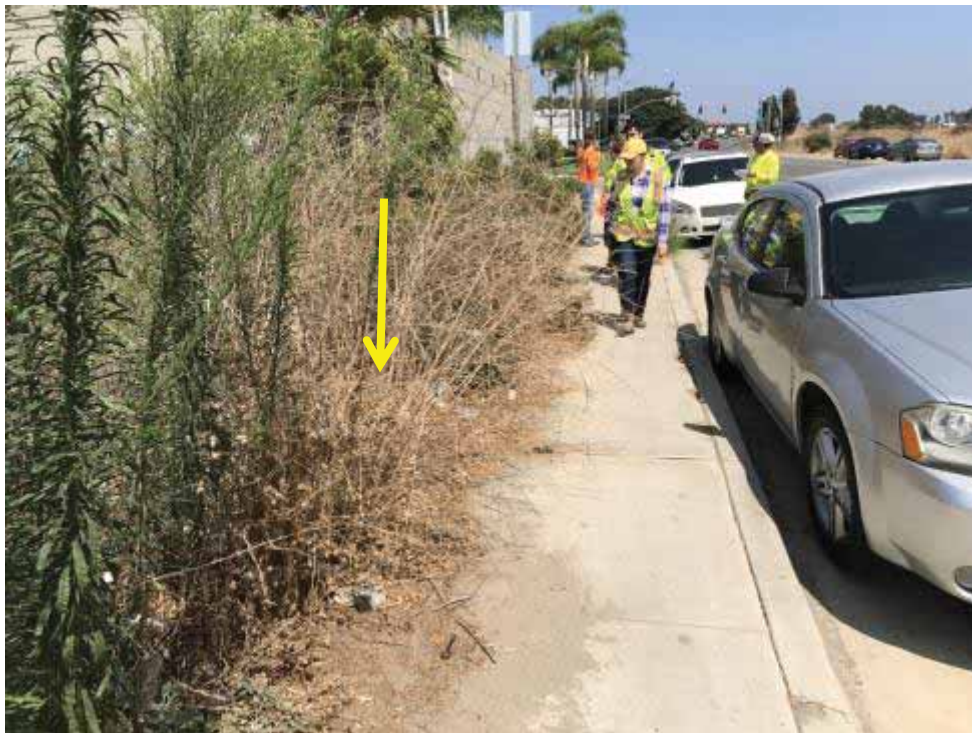


Photo 58. East-facing view of west pole location for GS-31.

PHOTO DOCUMENT
Sycamore-Peñasquitos 230-kV Transmission Line Project
Del Mar and Miramar, San Diego County, CA
AECOM Site Survey, August 15 & 25, 2017



Photo 59. West-facing view of east pole location for GS-31.

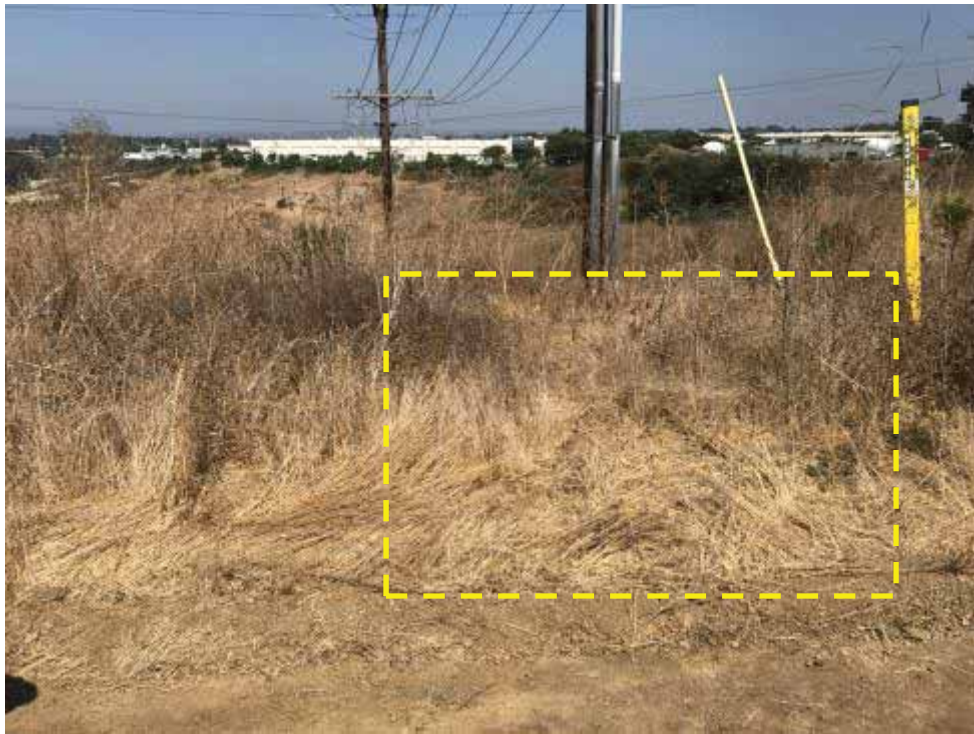


Photo 60. East-facing view of GS-32.

Attachment 3: Biological Pre-Activity Survey

SDG&E NCCP Pre-activity Survey Report Text Form

eTS Number	25459	Task Tracker Number	
Project Name	Sycamore-Peñasquitos 230-kV Transmission Line Project		
DPSS			

Proposed Work Description

San Diego Gas and Electric (SDG&E) proposes to access 16 poles and utilize 14 work areas for guard structures (GS) for overhead work as part of the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). The linear alignment of the poles and guard structures is located parallel to Interstate 805 (I-805) between Carrol Canyon Road and Governor Drive and partially within Marine Corps Air Station (MCAS) Miramar in western San Diego County. The purpose of this pre-activity survey is to review and analyze potential biological resource impacts associated with the proposed Project activities.

The Project is located between the existing Peñasquitos and Sycamore Canyon substations in San Diego, CA (United States Geological Survey Del Mar and Poway 7.5-minute quadrangles). The Project originates from the Peñasquitos substation, south of Carmel Mountain Road, and extends southeast to I-805 and Carroll Canyon Road. The alignment follows Carroll Canyon Road until extending slightly north of Miramar Road through commercial development before it reaches Interstate-15 (I-15). At I-15, the alignment follows Pomerado Road to Stonebridge Parkway and terminates at the Sycamore Canyon substation on MCAS Miramar.

The Project consists of the construction and operation of a 230-kV transmission line between the existing Sycamore Canyon and Peñasquitos substations. The 14-mile long project alignment has been divided into three segments and spans developed and open space areas. The segments are divided into the following components:

- Segment A – overhead alignment between Sycamore Canyon Substation and Stonecroft Trail within existing SDG&E right-of-way. One 230-kV steel cable pole will be constructed near Stonecroft Trail, and the existing 138-kV H-frame structure will be replaced with a steel H-frame dead-end structure.
- Segment B – underground alignment originating from the 230-kV cable pole near Stonecroft Trail and constructed within existing roads to Carroll Canyon Road.
- Segment C – overhead alignment between Peñasquitos substation and Carroll Canyon Road. One 230-kV steel cable pole will be constructed near Carroll Canyon road at the transition from overhead to underground.

A PSR for the Sycamore-Peñasquitos 230-kV Transmission Line Project was prepared and approved by the CDFW, USFWS, and CPUC in March of 2017. As part of the Project, SDG&E must now access 16 poles that run south of Segment C, in order to re-sag wire, equalize tension, and properly balance loads south of CC MM CP to the next dead-end structure. Project sites to be accessed for this overhead work are listed below in Table 1.

Table 1. Project Sites

Site	Proposed Access	Biological Constraints
Z479040	Truck access from dirt road in Village Nursery.	--
Z479041	Truck access from dirt road in Village Nursery.	--
Z479042	Truck access from dirt road in Village Nursery.	--
Z479043	Truck access from spur road off of dirt road in Village Nursery.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479044	Truck access from spur road off of dirt road	Pre-construction nesting bird survey

SDG&E NCCP Pre-activity Survey Report Text Form

	in Village Nursery.	(Feb 15-Aug 31).
Z479045	Truck access from spur road off of dirt road from Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479046	Truck access from dirt road off of Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479047	Overland travel from dirt road off of Nobel Drive.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479048	Truck access from dirt road off of Nobel Drive only. Access from Miramar Road is too steep for vehicles.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479049	Truck access from dirt road off of Miramar Road.	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May
Z479050	Truck access from dirt road off of Miramar Road.	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May
Z479051	Truck access from dirt road off of Miramar Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479052	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479053	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479054	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).
Z479055	Truck access from dirt road off of Eastgate Mall Road.	Pre-construction nesting bird survey (Feb 15-Aug 31).

Additionally, 14 work sites will be necessary to install guard structures to protect roadways, a railway, and distribution lines crossing underneath the transmission lines. Guard structures will be accomplished using one of four means:

- 1) Bucket truck staged under transmission line

A bucket truck will be staged under the transmission line to guard resources.

- 2) Two poles on either side of the transmission line, directly buried into the ground

A two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2-3 feet in diameter and 6-8 feet deep. Poles will be installed with a line truck and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the Project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.

- 3) Two poles on either side of the transmission line, flower pot method

The flower pot method involves installing poles into pots, anchoring them in with concrete, and placing the pot directly on the surface where the pole is needed. This method prevents ground disturbance.

SDG&E NCCP Pre-activity Survey Report Text Form

4) Protective material installed on distribution lines

A bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

Information on guard structures is detailed below in Table 2.

Table 2. Guard Structures

Guard Structure	Guarded Resource	Means	Bio Constraints
GS-19	Governor Drive/Village Nursery entrance	Direct buried poles	--
GS-20	Governor Drive/Village Nursery entrance	Direct buried poles	--
GS-21	Distribution line	Bucket truck	Pre-construction nesting bird survey (Feb 15-Aug 31). Avoid impacts to Nuttall's scrub oak (<i>Quercus dumosa</i>) located on north and east edges of GS-21
GS-22	Distribution line	Install protective material on line	Pre-construction nesting bird survey (Feb 15-Aug 31).
GS-23	Railroad	Bucket truck or flower pot poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May. Avoid impacts to woodrat nest located within southwest portion of work area or follow applicable Reviewer Recommendation for deconstruction. Avoid ground disturbance if work occurs during the non-blooming season of June to March for San Diego goldenstar; utilize flower pots or boom truck for guard structure. Biological monitor required during installation of steel plates over creek crossing to provide vehicle access.
GS-24	Railroad	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).
GS-25	Distribution line	Install protective material on line	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May.
GS-26	Nobel Drive	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).
GS-27	Nobel Drive	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31).

SDG&E NCCP Pre-activity Survey Report Text Form

GS-28	Miramar Road	Bucket truck or flower pot poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Pre-construction survey for San Diego goldenstar if work occurs during blooming season of April to May. Avoid ground disturbance if work occurs during the non-blooming season of June to March for San Diego goldenstar; utilize flower pots or boom truck for guard structure.
GS-29	Miramar Road	Direct buried poles	Pre-construction nesting bird survey (Feb 15-Aug 31). Avoid impacts to road ruts approximately 15 feet south of GS-28 which could support vernal pool species.
GS-30	East Gate Mall Road	Direct buried poles	--
GS-31	East Gate Mall Road	Direct buried poles	--
GS-32	Distribution line	Install protective material on line	Pre-construction nesting bird survey (Feb 15-Aug 31).

All guard structure locations will be accessed via existing dirt or paved access roads; with the exception of GS-23. An existing dirt access road to GS-23 is transected by Rose Creek and is not currently passable by vehicle due to severe erosion. Therefore, two 6-foot wide by 20-foot long steel plates with cribbing material will be installed to provide line truck access. The plates will be placed outside of the defined bed and bank of the creek to avoid impacts to jurisdictional resources. The steel plates will be installed with a boom truck and will remain entirely within the access road and over the creek.

Installation of guard structures is estimated to take three to five days to complete. Several crews of up to five personnel will conduct overhead work on the poles. The equipment to be used includes line trucks, bucket trucks, boom trucks, a water truck, and a pulling rig. It is estimated that it will take a total of seven to ten days to complete the overhead work at poles Z479050 through Z479055.

Trimming of vegetation may be necessary for placement of outriggers and/or direct buried poles. All trimmed vegetation will be removed from the site and properly disposed of. All SDG&E operational protocols will be implemented, and equipment and materials will be removed from the Project site upon completion of Project activities.

Habitat Evaluation

This linear project spans approximately 2.5 miles in length. The majority of the Project work areas occur on previously graded access roads and work pads which run immediately adjacent to the transmission line. SDG&E has previously mitigated for permanent impacts for creation and regular maintenance these access roads and work pads. While some of the access roads were observed to have plant growth at the time of the survey, no impacts are counted for utilization of existing access roads or work pads. However, current conditions are documented below. Additionally, habitat information for all portions of work areas occurring off of existing access roads/work pads is detailed below for each site.

Site-001 Pole Z479040

SDG&E NCCP Pre-activity Survey Report Text Form

Pole Z479040 and the associated work area are on an existing access road (Photo 1). The pole is immediately surrounded by potted nursery plants and developed roads associated with Village Nursery (Photo 2).

Site-002 Pole Z479041

Pole Z479041 is within an existing graded area/work pad. A single Mexican fan palm (*Washingtonia robusta*) and potted nursery plants immediately surround the pole (Photo 3). The work area associated with this pole is located within existing dirt access roads and a graded area covered by potted nursery plants which will be temporary relocated to accommodate construction activities at this location. The pole and work area are immediately surrounded by potted nursery plants and access roads associated with Village Nursery (Photo 4).

Site-003 Pole Z479042

Pole Z479042 and the associated work area occur within an existing graded area which includes dirt access roads and a graded area covered by potted nursery plants (Photo 5). The pole is immediately surrounded by potted nursery plants and developed roads associated with Village Nursery (Photo 6). The potted nursery plants will be temporary relocated to accommodate construction activities at this location.

Site-004 Pole Z479043

Pole Z479043 is at the terminus of an existing spur road/work pad. Several species have recruited within the graded work pad, including black mustard (*Brassica nigra*), Australian saltbush (*Atriplex semibaccata*), non-native grasses, deerweed (*Acmispon glaber*), tarweed (*Deinandra fasciculata*), broom baccharis (*Baccharis sarothroides*), and San Diego goldenbush (*Isocoma menziesii*) (Photo 7). The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded by coastal sage scrub/chaparral mix habitat dominated by chamise (*Adenostoma fasciculatum*), coastal sage brush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), broom baccharis, scrub oak (*Quercus berberidifolia*), and poison oak (*Toxicodendron diversilobum*) (Photo 8).

Site-005 Pole Z479044

Pole Z479044 is at the terminus of an existing spur road/work pad (Photo 9). Non-native plant growth, including star thistle (*Centaurea melitensis*), slender oat (*Avena barbata*), and non-native grass (*bromus* sp.) has occurred since the road was last maintained. The associated work area is entirely within the existing work pad. The pole and access road are immediately surrounded in all directions by coastal sage scrub/chaparral mix habitat (Photo 10).

Site-006 Pole Z479045

Pole Z479045 is at the terminus of an existing spur road/work pad which has become partially overgrown by black mustard and non-native grasses since last maintained (Photo 11). Coastal sage scrub species, including San Diego goldenbush, deerweed, tarplant, and broom baccharis have also recruited within the work pad from the immediate surrounding areas. The associated work area consists of the existing work pad, with a portion of disturbed habitat to the west of the work pad, which is dominated by non-native grasses and black mustard (Photo 12). The pole and access road are further surrounded on all sides by a mix of coastal sage scrub habitat dominated by coastal sage brush, broom baccharis, and California buckwheat, and disturbed habitat (Photo 13).

Site-007 Pole Z479046

Pole Z479046 occurs in bare ground immediately adjacent to a dirt access road (Photo 14). The pole appears to have been previously brushed, with a couple individuals of deerweed having recruited within the brushed area. The associated work

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area consists of the existing access road to the west of the pole, with a portion of disturbed habitat to the north of the pole and along the adjacent access road, which is dominated by non-native grasses (photo 15). The pole and access road are immediately surrounded on all sides by a mix of disturbed habitat and coastal sage scrub habitat.

Site-008 Pole Z479047

Pole Z479047 and the associated work area are within an existing work pad (Photos 16, 17). A portion of the work pad surrounding the pole has become overgrown with star thistle, slender oat, graceful tarplant (*Holocarpha virgata* ssp. *elongate*), and tarweed since it was last maintained. The pole and work area are further surrounded on all sides by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat.

Site-009 Pole Z479048

Pole Z479048 and an approximate 30-foot by 60-foot portion of the work area are in disturbed habitat dominated by non-native grasses and star thistle (Photos 18, 19). The remaining portion of the access road occurs within existing dirt access roads. The pole and work area are immediately surrounded by coastal sage scrub/chaparral mix habitat and disturbed habitat (Photo 20).

Site-010 Pole Z479049

Pole Z479049 is within disturbed habitat, dominated by non-native grasses, star thistle, and tarplant (Photo 21). The associated work area consists of the existing dirt access road/work pad, and a portion of coastal sage scrub habitat to the east of the pole dominated by California sagebrush (*Artemisia californica*), deerweed, and California buckwheat (Photo 22). The pole and work area are immediately surrounded by coastal sage scrub habitat and disturbed habitat (Photo 23).

Site-011 Pole Z479050

Pole Z479050 is within disturbed habitat dominated by slender oat and *bromus* sp. (Photo 24). The associated work area consists of the existing dirt access road, with a portion of coastal sage scrub habitat to the north of the pole and access road dominated by California sagebrush, deerweed, California buckwheat, ashy spike moss (*Selaginella cinerascens*), and non-native grasses (Photo 25). The pole and access road are surrounded by a mix of coastal sage scrub/chaparral mix habitat and disturbed habitat (Photo 26). Several naturally occurring vernal pools occur east of the access road to this pole; however, this area will not be accessed for Project-related activities.

Site-012 Pole Z479051

Pole Z479051 and the associated work area are within an existing access road/work pad (Photo 27). The pole and work area are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat (Photo 28).

Site-013 Pole Z479052

Pole Z479052 is within disturbed habitat dominated by slender oat and other non-native grass (Photo 29). The associated work area consists of the existing dirt access road to the north of the pole. The pole and access road are surrounded by a mix of disturbed habitat and coastal sage scrub/chaparral mix habitat (Photo 30).

Site-014 Pole Z479053

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Pole Z479053 is on bare ground (Photo 31). The associated work area consists of the existing dirt access road/work pad adjacent to the pole. The pole and work area are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat consisting of soft chess (*Bromus hordeaceus*) and rattail fescue (*Festuca myuros*) (Photo 32).

Site-015 Pole Z479054

Pole Z479054 is on bare ground (Photo 33). The associated work area consists of the existing dirt access road to the north of the pole and includes an approximate 12-foot by 50-foot area of disturbed habitat beyond the road which is dominated by non-native grasses and black mustard (Photo 34). The pole and work area are surrounded by a mix of disturbed habitat, coastal sage scrub habitat, and grassland habitat (Photo 35).

Site-016 Pole Z479055

Pole Z479055 is at the terminus of an existing dirt access road/work pad. Portions of the work pad have seen non-native plant growth, including black mustard and non-native grasses, since it was last maintained (Photo 36). The associated work area consists of the existing dirt access road to the southeast of the pole and includes portions of disturbed habitat south of the pole and east of the access road which are dominated by non-native grasses and black mustard. The pole and access road are surrounded by disturbed habitat, as well as coastal sage scrub habitat and grassland habitat (Photo 37).

Site-017 GS-19

GS-19 is located within bare ground and is surrounded by bare ground, pavement, and potted nursery plants (Photo 38).

Site-018 GS-20

GS-19 is located within bare ground and is surrounded by bare ground, pavement, and potted nursery plants (Photo 39).

Site-019 GS-21

GS-21 is located within an existing dirt spur road (Photo 40). Work area is needed to place two outriggers within coastal sage scrub/chaparral mix habitat dominated by poison oak (Photos 41, 42). Two Nuttall's scrub oaks are located immediately east of the south outrigger area and immediately west of the north outrigger area, on the east and north edges of GS-21. Impacts to these shrubs will be avoided during Project-related activities. GS-21 is immediately and further surrounded by coastal sage scrub/chaparral mix and disturbed habitat (Photo 43).

Site-020 GS-22

GS-22 is located partially within an existing dirt access road (Photo 44). It is immediately surrounded by riparian woodland and coastal sage scrub/chaparral mix habitat.

Site-021 GS-23

GS-23 is located within an existing dirt access road and includes work area on either side of the road for placement of two flower pot poles and four outriggers (Photos 45-47). The habitat on either side of the road consists of coastal sage scrub dominated by California buckwheat, broom baccharis, California sagebrush, San Diego goldenbush, deerweed, and tarplant. GS-23 is surrounded by coastal sage scrub and disturbed habitat. Rose Creek is located approximately 130-feet southwest of GS-23 (Photos 48, 49).

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Site-022 GS-24

GS-24 is located partially within an existing dirt access road and includes areas immediately south side the road for placement of two direct bury wooden poles (Photos 50, 51). The areas for the direct buried poles consist of disturbed habitat dominated by non-native grasses and Russian thistle (*Salsola tragus*). GS-24 is surrounded by coastal sage scrub and disturbed habitat.

Site-023 GS-25

GS-25 is located partially within an existing dirt access road and includes areas on either side of the road for placement of four outriggers (Photo 52). The habitat on either side of the road consists of coastal sage scrub dominated by California buckwheat, California sagebrush, deerweed, tarplant, non-native grasses, and Russian thistle. GS-25 is surrounded by coastal sage scrub.

Site-024 GS-26

GS-26 is located within bare ground immediately south of the sidewalk on the eastbound side of Nobel Drive (Photo 53). It is surrounded to the north by pavement and to the south by coastal sage scrub and disturbed habitat.

Site-025 GS-27

GS-27 is located within disturbed habitat immediately north of the sidewalk on the westbound side of Nobel Drive. The disturbed habitat is dominated by non-native grasses, horseweed (*Erigeron Canadensis*), and doveweed (*Croton setiger*) (Photos 54, 55). It is surrounded to the south by pavement and to the north by coastal sage scrub and disturbed habitat.

Site-026 GS-28

GS-28 is located within the work area associated with pole Z479049 (Photos 56, 57).

Site-027 GS-29

GS-29 is located within an existing dirt access road (Photo 58). It is surrounded by coastal sage scrub and disturbed habitat. Road ruts which could support vernal pool species occur approximately 15 feet south of the work area for this guard structure and will be flagged for avoidance prior to construction.

Site-028 GS-30

GS-30 is located within disturbed habitat dominated by non-native grasses and black mustard (Photo 59). It is surrounded by disturbed and coastal sage scrub habitat to the south, and Eastgate Mall Road to the north.

Site-029 GS-31

GS-31 occurs along Eastgate Mall Road within disturbed habitat dominated by black mustard, horseweed, and planted brittlebush (*Encelia farinosa*) (Photos 60, 61). It is surrounded to the south by Eastgate Mall Road, and to the north by disturbed and coastal sage scrub habitat.

Site-030 GS-32

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GS-32 occurs east of a dirt access road within disturbed habitat dominated by non-native grasses and black mustard (Photo 62). It is surrounded by disturbed and coastal sage scrub habitat.

General Wildlife

Wildlife species detected during survey included bushtit (*Psaltriparus minimus*), California towhee (*Melospiza crissalis*), California thrasher (*Toxostoma redivivum*), mourning dove (*Zenaidura macroura*), California quail (*Callipepla californica*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), black phoebe (*Sayornis nigricans*), Northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), red-shouldered hawk (*Buteo lineatus*), lesser goldfinch (*Spinus psaltria*) coastal California gnatcatcher (*Polioptila californica californica*; Natural Communities Conservation Plan (NCCP)-covered species).

NCCP-Covered Species

According to the California Natural Diversity Database, the following 12 NCCP-covered plant species and 5 NCCP-covered wildlife species have been recorded within 1 mile of the Project (Table 3). During the survey, coastal California gnatcatcher (*Polioptila californica californica*) was observed adjacent to pole Z479055 and a midden potentially belonging to San Diego desert woodrat (*Neotoma lepida intermedia*) was observed within the southwest portion of the work area of GS-23. No other NCCP-covered plant or wildlife species, or burrows, dens or nests were observed during the survey of the Project sites.

Table 3. Sensitive Species Covered by the SDG&E NCCP and Documented within One Mile of the Project Sites

Common Name	Scientific Name	Federal Status	State Status	NCCP Covered Narrow Endemic
<u>Plants</u>				
Lakeside ceanothus	<i>Ceanothus cyaneus</i>	--	--	--
Spreading navarretia	<i>Navarretia fossalis</i>	Threatened	--	--
Orcutt's brodiaea	<i>Brodiaea orcuttii</i>	--	--	--
Orcutt's spineflower	<i>Chorizanthe orcuttiana</i>	Endangered	Endangered	X
Short-leaved dudleya	<i>Dudleya blochmaniae</i>	--	Endangered	X
San Diego barrel cactus	<i>Ferocactus viridescens</i>	--	--	--
San Diego button celery	<i>Eryngium aristulatum var. parishii</i>	Endangered	Endangered	--
San Diego goldenstar	<i>Bloomeria clevelandii</i>	--	--	--
Willow monardella	<i>Monardella viminea</i>	Endangered	Endangered	X
Coastal dunes milk-vetch	<i>Astragalus tener var. titi</i>	Endangered	Endangered	X
San Diego mesa mint	<i>Pogogyne abramsii</i>	Endangered	Endangered	--
Wart-stemmed ceanothus	<i>Ceanothus verrucosus</i>	--	--	--
<u>Wildlife</u>				
Coastal California gnatcatcher	<i>Polioptila californica californica</i>	Threatened	--	--
San Diego fairy shrimp	<i>Branchinecta sandiegonensis</i>	Endangered	--	--
Orange-throated whiptail	<i>Aspidoscelis hyperythra</i>	--	--	--
San Diego coast horned lizard	<i>Phrynosoma blainvillii</i>	--	--	--
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	--	--	--

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Lakeside ceanothus is a shrub that occurs in chaparral habitats. Potentially suitable habitat for this species occurs in much of the surrounding area of the Project sites. However, this is a large perennial species that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

Spreading navarretia prefers vernal pools and vernal swales. Suitable vernal pool habitat does not occur at any of the Project sites. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Orcutt's brodiaea habitat includes meadows, vernal pools, and wetlands, and may occur in close coned coniferous forests, chaparral, and cismontane woodlands adjacent to moist areas. This species is a perennial bulbiferous herb that blooms between May and July. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Orcutt's spineflower, a San Diego County endemic, is associated with weathered sandstone bluffs or loose sandy soils associated with coastal or southern maritime chaparral. This species blooms March through May and would not have been detectable during the time of the survey. The sandy/cobbly soils and coastal sage scrub/chaparral mix habitat that exist adjacent to GS-22 are considered potentially suitable for this species. However, the closest documented occurrence (in Kearny Mesa) to the Project site is based on a collection that gave a general location and is considered extirpated. Therefore, the potential for this species to occur is considered very low, and no impacts to this species are anticipated from Project-related work.

Short-leaved dudleya is a perennial succulent that blooms from April to June. Its habitat includes coastal sage scrub and chaparral habitat at elevations between 20 and 1,700 feet. Although the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25 are located partially within coastal sage scrub habitat, this species is very restricted and is generally associated with unique sandstone formations. The likelihood of occurrence at any sites listed above is very low. While potentially suitable habitat for this species occurs in much the surrounding coastal sage scrub and coastal sage scrub/chaparral mix habitat associated with the Project, no individuals were observed during the survey. No impacts to this species are anticipated from Project-related work.

San Diego barrel cactus occurs in sandy or rocky areas in coastal sage scrub and valley grassland. Potentially suitable habitat for this species occurs within sites located partially within coastal sage scrub habitat, and in the immediate surrounding areas of the Project sites. However, this species is a perennial succulent that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

San Diego button celery is associated with vernal pools and has an affinity to be present within white clay bottom vernal pools and large, marshy areas with white clay soils. This species blooms from May to August. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

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San Diego goldenstar is a perennial herbaceous bulb which blooms from April to May. Habitat for San Diego goldenstar includes chaparral, coastal sage scrub, and valley and foothill grasslands. San Diego goldenstar is commonly found near vernal pool habitat. Potentially suitable coastal sage scrub habitat occurs within portions of the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. The surrounding coastal sage scrub, coastal sage scrub/chaparral mix, and grassland habitats of the Project sites provides moderately suitable habitat for this species. This species was not detected during the field survey. Due to the blooming period for this species and the fact that it is a bulb, it would not have been detectable at the time of the survey, if present. Impacts to this species will be avoided by avoiding ground disturbance within habitat suitable for this species if work occurs outside of the blooming season, or conducting a pre-construction survey to verify there are no plants present if work occurs during the blooming season.

Willow monardella is a perennial herb or subshrub which occurs in coastal sage or riparian scrub in sandy bottoms and on banks of ephemeral washes in canyons where surface water flows for usually less than 48 hours after a rain event. This species blooms from June through August. The work areas at GS-22 and GS-23 are located immediately adjacent to a sandy bottomed creek and provide habitat potentially suitable for this specie. However, this species is a robust perennial which would have been detectable at the time of the survey, if present. This species was not detected during the survey, and no impacts to this species are anticipated from Project-related work.

Coastal dunes milk-vetch habitat consists of coastal dunes, bluffs, and coastal terrace grassland. This species blooms from March through June. Currently, only one known population of this species exists in Monterey County, California, and no observations of this species have been made in San Diego County since 1975. While potentially suitable habitat for this species occurs in the area surrounding the Project sites, the Project work areas do not contain habitat suitable for this species, and this species is considered extirpated from San Diego County. As a result, this species is not expected to occur at the Project sites or in the immediate surrounding areas, and no impacts to this species are anticipated from Project-related work.

San Diego mesa mint is restricted to vernal pools. Redding cobbly loams are the preferred soil type near Miramar. While potentially suitable habitat occurs within various road ruts of dirt access roads associated with the Project sites, this species is unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of pole Z479050; however, this area will not be accessed for project activities. This species was not detected during the field survey, and no impacts to this species are anticipated from Project-related work.

Wart-stemmed ceanothus is a shrub that occurs in coastal chaparral intermixed with chamise (*Adenostoma fasciculatum*) and mission manzanita (*Xylococcus bicolor*). While potentially suitable habitat for this species occurs in the surrounding areas of much of the Project sites, suitable habitat does not occur at any of the Project sites. This is a large perennial species that would have been apparent at the time of the survey, if present. This species was not observed during the survey, and no impacts to this species are anticipated from Project-related work.

Coastal California gnatcatcher occurs in open coastal sage scrub habitat dominated by coastal sagebrush. Several of the Project sites contain coastal sage scrub habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the Project sites being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix habitat, the surrounding areas of all Project sites, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for coastal California gnatcatcher. Coastal California gnatcatcher was observed adjacent to pole Z479055 (32.887303, -117.201360). Impacts to this species will be avoided by conducting work outside of the breeding season and/or conducting pre-construction nesting bird surveys if work is to occur during the breeding season.

Orange-throated whiptail occurs in coastal sage scrub, chaparral, edges of riparian woodlands, and washes; and in weedy, disturbed areas adjacent to these habitats. Due to many Project features occurring within or being adjacent to coastal sage scrub and/or disturbed areas adjacent to coastal sage scrub, suitable habitat for orange-throated whiptail occurs at all

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Project sites; excluding Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. However, this species was not observed during the survey, and no impacts to this species are anticipated with implementation of Reviewer Recommendations below

San Diego coast horned lizard is found in a wide range of habitats including chaparral, coastal sage scrub, riparian, woodland, conifer forest, and grassland. Suitable habitat within these plant communities consists of loose soils with open bare ground. Potentially suitable habitat for this species occurs at all Project sites and within adjacent access roads; with the exception of Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. This species was not observed during the pre-activity survey, however there is potential for the San Diego coast horned lizard to occur throughout the majority of the Project area, and no impacts to this species are anticipated with implementation of Reviewer Recommendations below

San Diego fairy shrimp is associated with vernal pools ranging from Santa Barbara in the north, to Baja California, Mexico in the south, at elevations from sea level to approximately 2,300 feet. Suitable vernal pool habitat for this species does not occur at any of the Project sites. However, evidence of ponding was visible within low-lying and rutted portions of the dirt access roads to the Project sites. Ponded areas within the access roads are considered suitable habitat for this species. This species was not observed during the survey. Impacts to this species will be avoided as vehicles will not access wet or inundated dirt roads while working on the Project.

San Diego desert woodrat occurs in coastal southern California, south of San Luis Obispo, and northern Baja California in chaparral, sagebrush, and desert habitats. They construct large middens under cactus patches, rock outcrops, or under low trees. Several of the Project sites contain coastal sage scrub habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the Project sites being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix habitat, the surrounding areas of all Project sites, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for San Diego desert woodrat. A midden potentially belonging to this species was observed within the southwest portion of GS-23 (32.865319,-117.188133). Impacts to this species will be avoided by following the recommendations in MMCRP MM Biology-9 below.

Reviewer Recommendations

1. In order to prevent impacts to San Diego fairy shrimp, no vehicles will be permitted to drive off paved roads on MCAS Miramar for at least 72 hours after a significant rainfall event that has the potential to generate pools and create suitable road rutting conditions. No inundated pools will be driven through. No grading is to occur for this project.
2. In order to prevent potential impacts to San Diego goldenstar, if construction occurs during the blooming season of April to May, a survey shall be conducted by a Qualified Biologist within all work areas occurring in potentially suitable coastal sage scrub habitat (Tables 1 and 2). If observed, individuals will be flagged for avoidance and construction in the area will be monitored. At GS-23 and GS-28, if work is conducted outside of the blooming season, guard structures should be installed utilizing flower pots to avoid subsurface disturbance.
3. **MMCRP APM Biology-2:** SDG&E Subregional NCCP. The Project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The Project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the USFWS and the CDFW, respectively, for the management and

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conservation of multiple species and their associated habitats, as established according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area. Pursuant to the SDG&E Subregional NCCP, SDG&E will conduct pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm will survey all Project impact areas and prepared a PSR outlining all anticipated impacts related to the Project. The Project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR will be submitted to the CDFW and USFWS for review. Prior to the commencement of construction, a verification survey will be conducted of the Project disturbance areas, as required by the SDG&E Subregional NCCP. Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures. If the previously-delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank will be required to address impacts from project related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement. Specific operating restrictions that are incorporated into the Project design to comply with the SDG&E Subregional NCCP include the following:

- Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1);
- No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (7.1.1, 2);
- Feeding of wildlife is not allowed (Section 7.1.1, 4);
- No pets are allowed within the ROW (Section 7.1.1, 5);
- Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7);
- Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8);
- Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9);
- Field crews shall refer all environmental issues, including wildlife relocation, dead, or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10);
- All SDG&E personnel would participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11);

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- The Environmental Surveyor shall conduct pre-activity studies for all activities occurring in natural areas, and will complete a proactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13);
 - The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14);
 - The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25);
 - In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28);
 - The Environmental Surveyor shall conduct monitoring as recommended in the pre-activity study form (Section 7.1.4, 35);
 - Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38);
 - Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39);
 - During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section 7.1.6, 50);
 - Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52); and
 - Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).
4. ***MMCRP MM Biology-1a***: General Field Personnel Behavior Requirements. All field personnel shall abide by the following general behavior requirements:
- Vehicles must be kept on approved access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads. Vehicles shall be turned around in established or designated areas only;
 - No wildlife, including rattlesnakes, may be harmed, except to protect life and limb;
 - Firearms shall be prohibited except for those used by security personnel;
 - Feeding of wildlife shall not be allowed;
 - SDG&E personnel shall not bring pets to work areas in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations;

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- Parking or driving underneath oak trees shall not be allowed in order to protect root structures except in established traffic areas;
- Plant or wildlife species shall not be collected for pets or any other reason;
- Littering shall not be allowed. SDG&E shall not deposit or leave any food or waste in any work area;
- Wildfires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, trucks shall carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care shall be exhibited when smoking in permitted areas. Smoking is not permitted within the City of San Diego Open Space; and
- Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impact to a biologist(s) approved by the CPUC and the USFWS and CDFW. Other CPUC- and USFWS- or CDFW-biologists or experts in wildlife handling may need to be brought in for assistance with wildlife relocations.

5. ***MMCRP MM Biology-1b:*** Environmental Training Program. An environmental training program shall be developed and presented to all crew members prior to the beginning of all project construction. The training shall describe special-status plant and wildlife species and sensitive habitats that could occur within project work areas, protection afforded to these species and habitats, and avoidance and minimization measures required to avoid and/or minimize impacts from the project. Penalties for violations of environmental laws shall also be incorporated into the training session. Each crewmember shall be provided with an informational training handout and a decal to indicate that he/she has attended the training. The roles and responsibilities of CPUC-, USFWS-, and CDFW-approved biologist(s) and other environmental representatives shall be identified in the MMCRP and discussed during the training. All new construction personnel shall receive this training before beginning work on this project.

A copy of the training and training materials shall be provided to CPUC for review and approval at least 30 days prior to the start of construction. Training logs and sign-in sheets shall be provided to CPUC on a monthly basis. As needed, in-field training shall be provided to new on-site construction personnel by the environmental compliance supervisor or a qualified individual who shall be identified by SDG&E's Project Biologist, or initial training shall be recorded and replayed for new personnel.

6. ***MMCRP MM Biology-1c:*** Pre-Activity Surveys. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct a pre-activity survey for all activities occurring off of access roads in sensitive habitats. The pre-activity survey shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-activity survey shall be documented by the Qualified Biologist in a PSR. The PSR shall be submitted to the CPUC for review and approval prior to the start of construction, and the results shall be submitted to CDFW and USFWS as required by any regulatory permits or approvals. The PSR shall include the following:

- Type, location, and size of project;
- Date, time, weather, surrounding land uses;
- Evaluation of type and quality of habitat;
- Work description and methods which will be used to avoid or minimize ground disturbance, including biological monitoring during construction;

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- Anticipated impacts and proposed mitigation; and
- Map of location of work area.

In those situations where the Qualified Biologist cannot make a definitive species identification, the Qualified Biologist shall make a determination based on the available evidence and professional expertise.

In order to ensure that habitats are not inadvertently impacted, the CPUC-, USFWS-, and CDFW-approved biologist shall flag boundaries of habitat which must be avoided. When necessary, the CPUC-, USFWS-, and CDFW-approved biologist shall also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the CPUC-, USFWS-, and CDFW-approved biologist shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project site-specific basis.

Avoidance of habitat for thread-leaved brodiaea is prioritized over minimization and mitigation.

SDG&E shall maintain a library of special-status plant species locations, known to SDG&E, occurring within the project BSA. "Known" means a verified population either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency HCPs, pre-activity surveys, or biological surveys conducted for environmental compliance of the project. Plant inventories shall be consulted as part of pre-activity survey procedures.

7. ***MMCRP MM Biology-1d***: Maintenance, Repair, and Construction of Facilities. SDG&E shall implement the following measures pertaining to maintenance, repair, and construction of facilities:
- Maintenance, repair and construction activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs;
 - Routine maintenance of all facilities shall include visual inspections on a regular basis, conducted from vehicles driven on the project access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot or from the air;
 - Erosion shall be minimized on access roads and other locations primarily with water bars. The water bars are mounds of soil shaped to direct flow and prevent erosion;
 - Hydrologic impacts shall be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices;
 - When siting new facilities, every effort shall be made to cross wetland habitat perpendicular to the watercourse, spanning the watercourse to minimize the amount of disturbance to riparian area.
 - During repair or maintenance of facilities in a streambed, water may be temporarily diverted as long as the natural drainage patterns are restored after disturbance to minimize the impact of the disturbances and to help re-establish or enhance the native habitat. Erosion control during construction in a streambed in the form of intermittent check dams and culverts shall also be considered to prevent alteration to natural drainage pattern and prevent siltation;
 - Impact to wetlands shall be minimized by avoiding pushing soil or brush into washes or ravines;
 - During work on facilities, all trucks, tools, and equipment shall be kept on existing access roads or cleared areas, to the extent possible;

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- i. The CPUC-, USFWS-, and CDFW-approved biologist shall approve of an activity prior to working in any natural area where disturbance to habitat may be unavoidable;
- j. Insulator washing shall be allowed from access roads if other applicable protocols in this MM are followed;
- k. Brush clearing around facilities for fire protection shall not be conducted from January 15 through August 31 (to avoid the general bird nesting season) without prior approval by the CPUC-, USFWS-, and CDFW-approved biologist. The CPUC-, USFWS-, and CDFW-approved biologist shall make sure that the habitat contains no active nests, burrows, or dens prior to clearing;
- l. In the event that a special-status plant species is located within the area required to be cleared for fire protection purposes, SDG&E shall notify the USFWS (for ESA-listed plants), and CDFW (for CESA-listed plants), in writing, of the plant's identity and location and of the proposed activity, which will result in a take of such plant. Notification shall occur ten working days prior to such activity, during which time USFWS or CDFW may remove such plant(s). If neither USFWS nor CDFW have removed such plant(s) with the ten working days following the notice, SDG&E may proceed to complete its fire clearing and cause a take of such plant(s) consistent with SDG&E's take coverage for the ESA- or CESA-listed plants. When fire clearing is necessary in instances other than around power poles, and the potential for impacts to special-status species exist, SDG&E shall follow the pre-activity survey and notification procedures in MM Biology-1c, above. Wire stringing shall be allowed year-round in sensitive habitats if the conductor is not allowed to drag on the ground or in brush and vehicles remain on access roads;
- m. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes;
- n. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the CPUC-, USFWS-, and CDFW-approved biologist, or used immediately to fill eroded areas. Cleared vegetation shall be hauled to a permitted disposal location;
- o. The CPUC-, USFWS-, and CDFW-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats. Whenever possible, trees in sensitive habitats such as native riparian, woodland, or scrub vegetation shall be scheduled for trimming in non-sensitive times (i.e., outside of breeding or nesting seasons);
- p. No new facilities and activities shall be planned that would disturb vernal pools, their watersheds, or impact their natural regeneration. Continued historic maintenance of existing infrastructure utilizing existing access roads shall be allowed to continue in areas containing vernal pool habitat, provided no such habitat located within these roads would be impacted by project activities. New construction of overhead infrastructure which spans vernal pool habitats shall be allowed as long as the placement of facilities or the associated construction activities in no way impact the vernal pools;
- q. If any previously unidentified dens, burrows, nests, or special-status plants are located on any project site after the pre-activity survey, the CPUC-, USFWS-, and CDFW-approved biologist shall be contacted. The CPUC-, USFWS- and CDFW-approved biologist shall determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc.;
- r. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct monitoring as recommended in the PSR. At completion of work, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall check to verify

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compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall be responsible for removing all habitat flagging from the construction site;

- s. The CPUC-, USFWS-, and CDFW-approved biologist(s) shall conduct checks on mowing procedures to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than four inches;
 - t. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected, or from which animals cannot be removed, shall be capped or otherwise covered at the end of each work day to avoid animal entrapment. Old piping or other supplies that have been left open shall not be capped until inspected and any species found in them allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by the CPUC-, USFWS- and CDFW-approved biologist. Refer to MM Biology-1a, Item 10 [referred to as Item J herein] for wildlife relocations;
 - u. All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in the trench or excavation, the CPUC-, USFWS-, and CDFW-approved biologist(s) shall be called immediately to remove it if it cannot escape unimpeded;
 - v. Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities shall be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour; and
 - w. Before using pesticides in areas where burrowing owls may be found, a pre-activity survey shall be conducted.
8. ***MMCRP MM Biology-1g:*** Survey Work Protocols. SDG&E shall implement the follow measures during survey work:
- a. Brush clearing for foot path or line-of-sight cutting shall not be allowed from February through September without prior approval from the CPUC-, USFWS-, and CDFW-approved biologist, who will ensure the brush clearing activity, does not adversely affect a special-status species or nesting birds;
 - b. SDG&E survey personnel shall keep vehicles on existing access roads. No clearing of brush shall be allowed from February through September without prior approval from the CPUC-, USFWS-, and CDFW-approved biologist, who will ensure the brush clearing activity, does not adversely affect a special-status species or nesting birds; and
 - c. Hiking off roads or paths for survey data collection shall be allowed year-round as long as other protocols are met.
9. ***MMCRP MM Biology-3:*** Weed Control Plan. SDG&E shall prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive, non-native species abatement. Developed land shall be excluded from weed control. Where SDG&E owns the property, the Weed Control Plan shall include specific weed abatement methods, practices, and treatment timing developed specifically for the Project area by

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qualified individuals with at least 5 years of weed control experience within San Diego County. The Weed Control Plan shall address control methods and issues controlling invasive non-native species within all vegetation communities and land cover types found along the Project alignment. On ROW easement on MCAS Miramar, the Weed Control Plan shall incorporate all appropriate and legal U.S. Marine Corps-stipulated regulations. The Weed Control Plan shall be submitted to MCAS Miramar for final authorization of weed control methods, practices, and timing prior to implementation of weed control on MCAS Miramar. The Weed Control Plan shall be submitted to the City of San Diego for final authorization of weed control methods, practices, and timing prior to implementation of any weed control within the City of San Diego MHPA. The Weed Control Plan shall include the following:

- A pre-construction weed inventory shall be conducted by surveying the entire ROW and areas immediately adjacent to the ROW where access permission is obtained, as well as at all ancillary facilities associated with the Project for weed populations that: (1) are considered by the San Diego County Agriculture Commissioner, MCAS Miramar (for ROW on MCAS Miramar), or City of San Diego (for ROW within the City of San Diego MHPA) as being a priority for control, (2) are weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory (online) Database (Cal-IPC 2006 [and 2007 update]; <http://www.cal-ipc.org/ip/inventory/index.php>) or are weed species of concern to MCAS Miramar (for ROW on MCAS Miramar), and (3) aid and promote the spread of wildfires in San Diego County.
- Prolific wildfire-promoting species such as brome grasses (*Bromus* sp.) shall be mapped but not targeted for control outside of Project impact areas. These populations shall be mapped and described according to density and area covered. These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations included in the Weed Control Plan or required by MCAS Miramar or City of San Diego.
- Weed control treatments shall include all legally permitted methods to be used in the following prioritized order: preventative, manual, mechanical, and chemical.
- All treatments shall be applied with the authorization of the, MCAS Miramar and City of San Diego as appropriate.
- The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator.
- Where manual and/or mechanical methods are used, disposal of the plant debris will be within an approved landfill area within San Diego County.
- The timing of the weed control treatment shall be determined for each plant species in consultation with the PCA for the Project, and with MCAS Miramar, and City of San Diego as appropriate, with the goal of controlling populations before they start producing seeds. For the lifespan of the project (i.e., as long as the project is physically present), long-term measures to control the introduction and spread of weeds in the project area shall be taken as follows:
 - From the time construction begins until 2 years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. After this time, surveying for new invasive weed populations and monitoring of identified and treated populations shall be required at an interval of every two years.

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- However, the treatment of weeds shall occur on a minimum annual basis, unless otherwise approved by the PCA, MCAS Miramar, and City of San Diego as appropriate.
 - During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall also be certified weed free.
 - During project construction, vehicle and boot wash stations shall be provided.

10. **MMCRP MM Biology-6:** Compensatory Mitigation for Impacts to Habitat. SDG&E shall restore temporarily impacted areas to pre-construction conditions following construction according to the performance criteria described below and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation, for example. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community. Restoration of temporarily impacted areas involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, maintaining (i.e., weeding, replacement planting, supplemental watering, etc.), and monitoring the restored area for a period of 5 years and or until year 5 success criteria are met. SDG&E shall prepare a Habitat Restoration Plan that shall be subject to approval by the CPUC, USFWS, CDFW, City of San Diego (for restoration within City of San Diego MHPA), and MCAS Miramar (for restoration on MCAS Miramar) prior to habitat impacts. Required mitigation ratios are provided by habitat type in Table 4.1-10. In cases where the impacts to sensitive vegetation communities occur in the City of San Diego MHPA, the mitigation shall also occur in the MHPA. The Habitat Restoration Plan shall also identify, if applicable, the potential for reintroduction and/or increasing MSCP-covered species populations within habitat restoration areas if those covered species were affected by the Project.

Table 4: Required Habitat Mitigation Ratios

Vegetation Community	Mitigation Ratio	
	Temporary	Permanent ¹
Diegan Coastal Sage Scrub		
Diegan coastal sage scrub	1:1	1:1
Diegan coastal sage scrub in the MHPA	1:1	2:1
Diegan coastal sage scrub-Disturbed	1:1	1:1
Diegan coastal sage scrub-Disturbed in the MHPA	1:1	2:1
Diegan coastal sage scrub-Revegetated	1:1	1:1
Diegan coastal sage scrub-Revegetated in the MHPA	---	2:1
Coastal Sage Scrub		
Coastal sage-chaparral scrub	0.5:1	1:1
Coastal sage-chaparral scrub in the MHPA	1:1	2:1
Chaparral		
Chamise chaparral	0.5:1	1:1
Chamise chaparral in the MHPA	1:1	2:1
Chamise chaparral-disturbed	0.5:1	1:1
Chamise chaparral-disturbed in the MHPA	1:1	2:1
Scrub oak chaparral	1:1	1:1

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Scrub oak chaparral in the MHPA	2:1	2:1
Southern mixed chaparral	0.5:1	1:1
Southern mixed chaparral in the MHPA	1:1	2:1
Southern mixed chaparral-disturbed	0.5:1	1:1
Southern mixed chaparral-disturbed in the MHPA	1:1	2:1
Grassland		
Native grassland	1:1	1:1
Native grassland in the MHPA	2:1	2:1
Non-native grassland	0.5:1	1:1
Non-native grassland in the MHPA	---	2:1
Freshwater Marsh		
Freshwater marsh	---	1:1
Vernal Pool		
San Diego Mesa Vernal Pool	3:1	3:1
Riparian		
Southern riparian scrub	---	1:1
Mule fat scrub	---	1:1
Mulefat scrub in MHPA	---	2:1
Southern willow scrub	---	1:1
Southern willow scrub in MHPA	---	2:1
Tamarisk scrub in MHPA	---	2:1
Southern coast live oak riparian forest	---	1:1
Southern coast live oak riparian forest in MHPA	---	2:1

Notes

¹ Mitigation ratios for permanent impacts are consistent with SDG&E's NCCP; 1:1 for permanent impacts outside a preserve and 2:1 for permanent impacts inside a preserve.

The Restoration Plan shall include the following performance criteria:

- a. Percent cover and composition shall be similar to the conditions of a nearby reference site, defined as variation of no more than 10 percent absolute cover from the reference site cover and species composition condition;
- b. Maintenance and monitoring for restoration shall be for 5 years or until success criteria are met. Compensation planting areas shall be monitored eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and above;
- c. Compensation planting areas shall be monitored for invasive plants in the first 5 years following replanting. Invasive plant monitoring shall occur eight times in Year 1, six times per year in Years 2 and 3, and 4 times per year in Years 4 and 5. If invasive plants are found during the 5-year monitoring period, they shall be removed as necessary to support meeting the cover and vegetation composition success criteria;

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- d. If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the 5-year period until the criteria are met or unless otherwise approved by the CPUC; and
- e. Maintenance and monitoring shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration.

Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints or implementing the Habitat Management Plan after the allowed timeframe of 18 months following the initiation of any vegetation disturbing activities) shall be mitigated at a 5:1 ratio. Restoration of the unauthorized impacts shall be credited at a 1:1 ratio (i.e., mitigated by in-place habitat restoration); the remaining 4:1 shall be acquired and preserved off-site.

For areas where habitat restoration cannot meet mitigation requirements, as determined by the Habitat Restoration Specialist in coordination with CPUC, USFWS, CDFW, and MCAS Miramar (for restoration on MCAS Miramar), off-site purchase and dedication of habitat (or as otherwise prescribed by MCAS Miramar for restoration on MCAS Miramar) shall be provided at the mitigation ratios provided in Table 4.

Mitigation Parcels/Habitat Management Plans. All off-site mitigation parcels shall be approved by the CPUC, USFWS, CDFW and MCAS Miramar (as applicable) and must be acquired, or their acquisition must be assured. To demonstrate that such parcels will be acquired, SDG&E shall submit a Habitat Acquisition Plan at least 120 days prior to any ground disturbing activities for CPUC, USFWS, CDFW, and MCAS Miramar (as applicable) review and approval. The Habitat Acquisition Plan shall include, but shall not be limited to:

- a. Legal descriptions and maps of all parcels to be acquired;
- b. Schedule that includes phasing relative to impacts;
- c. Documentation demonstrating that the mitigation parcel(s) provides high quality habitat roughly equivalent in composition to the habitats that would be impacted by the project and at appropriate acreages;
- d. Timing of conservation easement recording;
- e. Initiation of habitat management activities relative to acquisition; and
- f. Assurance mechanisms (e.g., performance bonds to assure adequate funding) for any parcels not actually acquired prior to vegetation disturbing activities.

A Habitat Management Plan shall be prepared by a biologist and approved by the CPUC, USFWS, CDFW, and MCAS Miramar (as applicable) for all acquired off-site mitigation parcels. The Habitat Management Plan must be approved in writing by these agencies (as applicable) within 18 months of the initiation of any vegetation disturbing activities. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, off-site mitigation parcels. The Habitat Management Plan shall include, but shall not be limited to:

- a. Adequate SDG&E funding for the preparation and implementation of the HMP;
- b. Legal descriptions of all mitigation parcels approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts);

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- c. Baseline biological data for all mitigation parcels;
- d. Designation of a land management entity approved by the CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts) to provide in-perpetuity management;
- e. A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan;
- f. Designation of responsible parties and their roles (e.g., provision of endowment by SDG&E to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity); and
- g. Management specifications including, but not limited to, regular biological surveys to compare with the baseline data; invasive, non-native species control; fence/sign replacement or repair; public education; trash removal; and annual reports to CPUC, USFWS, CDFW, and MCAS Miramar (for mitigation parcels to be acquired for MCAS Miramar impacts).

11. ***MMCRP MM Biology-7:*** Mitigation for Bird Species. *This measure applies to all work areas in which any construction-related activities must be conducted during the nesting bird season (generally between January 15 and August 31, but may be earlier or later depending on species, location, and weather conditions).*

Nesting Bird Survey Requirements: If work is scheduled to occur during the avian nesting season, nesting bird surveys shall be conducted according to the following provisions:

- a. Nest surveys shall occur within 5 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities. If there is no work in an area for 7 days, it shall be considered a new work area if construction, vegetation trimming, or vegetation removal begins again;
- b. Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests, which is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once fledglings are no longer dependent on the nest". Surveys shall include nests of protected species within vegetation identified for removal and/or pruning, and within the following buffers of active work areas: 0.25-mile buffer for white-tailed kite; 500-foot buffer for other raptor species;
- c. Surveys shall be conducted during locally appropriate dates for nesting seasons determined in consultation with the USFWS and CDFW; note that generally the season is between January 15 and August 31 but may be earlier or later depending on species, location, and weather conditions. Species-specific nesting seasons for some species are identified below;
- d. The surveys shall be conducted by a CPUC, USFWS-, and CDFW-approved qualified biologist;
- e. Survey results shall be provided to CPUC, USFWS, and CDFW prior to initiating construction activities; and
- f. Work areas within which significant noise is not generated, such as work performed manually, by hand or on foot, and/or that would not cause significant disturbances to nesting birds (e.g., operating switches, driving on access roads, normally occurring activities at substations, and activities at staging and laydown

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areas) do not need to be surveyed prior to use. None of these activities shall result in physical contact with a nest.

Avoid Impacts on Nesting Birds. During the nesting season (generally between January 15 and August 31) raptor nests that are located within a 500-foot buffer from a work location shall be evaluated by a CPUC-, USFWS-, and CDFW-approved qualified biologist to determine whether the raptor nest is active. No trees with active raptor nests shall be removed during nesting season.

No additional measures shall be implemented if active nests are more than the following distances from the nearest work areas: (a) 0.25 mile for white-tailed kite, (b) 500 feet for raptors, Coastal California gnatcatcher, and least bell's vireo, (c) 250 feet for passerine birds in open space areas, or (d) 150 feet for common (non-special status) passerine birds in residential, commercial, and industrial areas. Buffers shall not apply to construction-related traffic using existing roads where the use of such roads is not limited to project-specific use (i.e., county roads, highways, farm roads, or other private roads). Where road use is limited to project-specific use, a buffer reduction or approval to drive through a buffer shall be obtained as described below under "Buffer Reduction".

As appropriate, exclusion techniques may be used for any construction equipment that is left unattended for more than 24 hours to reduce the possibility of birds nesting in the construction equipment. An example of an exclusion technique is covering equipment with tarps.

Buffer Reduction. The specified buffers from nesting birds may be reduced on a case-by-case basis if, based on compelling biological or ecological reasoning (e.g., the biology of the bird species, concealment of the nest site by topography, land use type, vegetation, level of project activity, and level of pre-existing disturbance on site), it is determined by a CPUC-, USFWS-, and CDFW-approved qualified biologist that implementation of a specified smaller buffer distance will still avoid nest abandonment and failure. This requirement includes buffer reductions or temporary buffer incursions for project-related use of roads where no stopping, standing, or other work activities shall occur in the buffer. Requests to reduce standard buffers or for temporary buffer incursions must be submitted to CPUC's independent biologist for review. Requests to reduce buffers must include:

- a. Species;
- b. Location;
- c. Pre-existing conditions present on site;
- d. Description of the work to be conducted within the reduced buffer;
- e. Size and expected duration of proposed buffer reduction;
- f. Reason for the buffer reduction;
- g. Name and contact information of the CPUC-, USFWS-, and CDFW-approved qualified biologist(s) who requested the buffer reduction and will conduct subsequent monitoring; and
- h. Proposed frequency and methods of monitoring necessary for the nest given the type of bird and surrounding conditions.

CPUC's independent biologist shall respond to SDG&E's request for a buffer reduction (and buffer reduction terms) within 1 business day; if a response is not received, SDG&E may proceed with the buffer reduction until CPUC's independent biologist can review and approve or deny the buffer reduction request. If SDG&E

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proceeds with a reduced buffer, nests shall be monitored on a daily basis during construction activities. If the buffer reduction request is denied, or if the qualified biologist determines that the nesting bird(s) are not tolerant of project activity, the specified buffer(s) listed above in this measure shall be implemented.

Non-special status species found building nests within the work areas after specific project activities begin may be tolerant of that specific project activity; however, the CPUC-, USFWS-, and CDFW-approved qualified biologist shall implement an appropriate buffer or other appropriate measures to protect the nest after taking into consideration the position of the nest, the bird species nesting on site, the type of work to be conducted, and duration of the construction disturbance. In these cases, the proposed buffer or other measures must be approved by CPUC's independent biologist through the buffer reduction process outlined in this measure, if buffers are less than those specified in this measure. These nests shall be monitored on a daily basis and only during construction activities (no monitoring required during periods when no work is conducted) by a qualified biologist until the qualified biologist has determined that the young have fledged or construction ends within the work area (whichever occurs first). If the qualified biologist determines that the nesting bird(s) are not tolerant of project activity, the buffer outlined above in this measure shall be implemented.

Specific Requirements for Coastal California Gnatcatcher and Least Bell's Vireo. Where there is potential nesting habitat for the coastal California gnatcatcher or least Bell's vireo within or adjacent to the MHPA, construction or operation/maintenance noise that exceeds the existing baseline noise level for a site by more than 3 dB hourly average or an hourly average threshold of 60 decibels, whichever is higher, shall be avoided during these species' breeding seasons as follows: coastal California Gnatcatcher March 1 through August 15, and least Bell's vireo March 15 through September 15. If avoidance is not possible during the breeding season, SDG&E shall work with a qualified acoustician approved by the CPUC, USFWS, and CDFW to develop and implement noise attenuation measures. The following measures shall be adhered to when project activities during the breeding season occur within riparian habitats that may support vireo and flycatcher:

- A biologist knowledgeable of vireo and/or flycatcher biology and ecology, approved by the CPUC, USFWS, and CDFW, will survey within the project impact footprint and a 300-foot buffer (within riparian scrub) before clearing vegetation or project construction to check for vireo and/or flycatcher nesting activity. Should an active nest be located in the impact footprint, then work will be suspended until the nest is vacated.

- Biological buffers of at least 100 feet will be maintained adjacent to active nests.

For project activities during the breeding season adjacent to known occupied vireo and/or flycatcher nesting habitat, the biologist will monitor nesting bird activity. If the biologist determines that nesting birds are being disrupted by project activities, then work will be suspended until effective minimization measures (e.g., noise attenuation structures) developed in coordination with the CPUC, USFWS, and CDFW are in place or until after the breeding season is completed.

Any lighting required during project activities will be shielded and directed away from vireo and/or flycatcher habitat to ensure that these areas are not artificially illuminated.

Avian Protection on Power Lines. The project shall include collision-reducing techniques for transmission lines (based on Reducing Avian Collisions with Power Lines: The State of the Art in 2012; Avian Power Line Interaction Committee [APLIC] 2012).

Monitoring and Reporting. All nests with a reduced buffer shall be monitored on a daily basis during construction activities by a CPUC-, USFWS-, and CDFW-approved qualified biologist until the qualified biologist has determined that the young have fledged or until one week after construction ends within the reduced buffer/work area (whichever occurs first).

Nest locations and exclusion buffers shall be mapped (using geographic information systems [GIS]) for all nests identified. This information shall be maintained in a database and shall be provided to CPUC, CDFW, and

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USFWS. A monthly written report shall be submitted to CPUC, CDFW, and USFWS for construction within a reduced buffer and shall include the following: information included in buffer reduction requests, work conducted within the work site, duration of work activities and related buffer reduction, information on nest success (eggs, young, and adults). No avian reporting shall be required for construction occurring outside of the nesting season and if construction activities do not occur within a reduced buffer during any calendar month. A final report shall be submitted to CPUC, CDFW, and USFWS at the end of each nesting season summarizing all avian-related monitoring results and outcomes for the duration of project construction. Nests located in areas of existing human presence and disturbance, such as in yards of private residences, or within commercial and or industrial properties, are likely acclimated to disturbance and do not need to be monitored, as determined by the CPUC-, USFWS-, and CDFW-approved qualified biologist and approved by CPUC's independent biologist.

12. ***MMCRP MM Biology-8:*** Burrowing Owl Monitoring and Mitigation Plan. SDG&E shall prepare a Burrowing Owl Monitoring and Mitigation Plan (BOMMP) consistent with the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). SDG&E shall submit the Draft BOMMP to CDFW and CPUC. SDG&E shall be required to obtain approval from CDFW on the BOMMP prior to construction. SDG&E shall provide the approved BOMMP to the CPUC 30 days prior to construction.

In accordance with the Staff Report on Burrowing Owl Mitigation (CDFW 2012) and CDFW-approved BOMMP, SDG&E shall conduct a preconstruction take avoidance survey for the burrowing owl prior to initiating ground disturbance activities. In areas where owl presence is not found, construction may proceed without further mitigation. If western burrowing owl occupancy on site is confirmed during preconstruction take avoidance surveys, SDG&E shall implement the CDFW-approved Burrowing Owl Monitoring and Mitigation Plan in coordination with CDFW.

13. ***MMCRP MM Biology-9:*** San Diego Desert Woodrat Mitigation. A CPUC-approved qualified biologist shall conduct a preconstruction survey to identify potential San Diego desert woodrat houses within the project work areas and within 5 feet of the edge of the work areas to avoid direct take of woodrats. All woodrat houses shall be documented and reported through the MMCRP. Woodrat houses found within the work site or within 5 feet from a work site shall be flagged or fenced for avoidance. If impacts to a woodrat house located within a work site are unavoidable, a CPUC-approved qualified biologist, prior to construction and outside of the breeding season (April through June), shall dismantle the house by hand, removing the materials layer by layer to allow for adult woodrats to escape. If young are present and found during the disassembling process, the CPUC-approved qualified biologist shall leave the site for at least 24 hours to allow for the rats to relocate their young on their own. This step shall be repeated as needed until the young have been relocated by the parent woodrats. Once the nest is vacant, the disassembly process shall be completed and the nest sticks shall be collected and moved to another suitable nearby location to allow for nest reconstruction. Piles of cut vegetation/slash shall be retained near the work site prior to nest dismantling to provide refuge for woodrats that may become displaced.

Summary of Impacts

No permanent impacts will result from this Project. Only overhead work is proposed for poles. Overhead work is assumed to have a temporary impact area around the base of each pole of 34 square feet, which is caused by pedestrian access around the base of the pole. Additional workspace associated with each pole is designated as necessary. Temporary impacts resulting from guard structures vary in size and are caused by staging of bucket trucks, placement of outriggers, and placement of temporary direct buried poles.

The total work area estimated for the proposed construction activities described in this PSR is 3.12 acres, as summarized in the table below. The majority of the work area (127,682 square feet) to be utilized occurs within existing developed access

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roads and work pads. No impacts associated with utilization of existing paved access roads, dirt access roads, and work pads (including pedestrian access around the bases of poles located within work pads) are included in this PSR.

Land Cover Type	Acres	Temporary Impacts (Square Feet)
Developed (Existing Access Roads and Pads)	2.93	127,682
Disturbed/Bareground (Outside of Existing Access Roads and Pads)	0.15	6,490
Sensitive Habitat (CSS & CSS/Chaparral Mix)	0.04	1,735
Total including habitat	3.12	135,907

A total of 8,225 square feet of temporary impacts are anticipated to occur as a result of the Project. Temporary impacts include 6,490 square feet of impact to bare ground and disturbed area, and 1,735 square feet to sensitive habitat (1,719 square feet to coastal sage scrub and 16 square feet to coastal sage scrub/chaparral mix habitat). A breakdown of impacts can be referenced in the accompanying PSR Data Form.

Following implementation of SDG&E's Operational Protocols and the Reviewer Recommendations above, no impacts to potentially-present NCCP-covered wildlife species are expected to occur as a result of this Project.

Mitigation

According to maps provided by SDG&E, poles Z479053, Z479054, Z479055, GS-31, and GS-32 are located outside of an SDG&E-defined Preserve area. Per Table 7.4 of the NCCP, temporary impacts outside the designated Preserve do not require mitigation. Furthermore, no impacts to sensitive habitat types are anticipated at these work sites. Therefore, SDG&E does not propose mitigation for temporary impacts occurring at poles Z479053, Z479054, Z479055, GS-31, or GS-32.

The remaining poles are located on MCAS Miramar property, where no Preserve boundaries have been established. As stated in SDG&E's NCCP, when no Preserve is formally delineated, habitats of moderate, high, or very high quality are to be considered as Preserve. Habitat quality is based on plant species composition and connectivity with surrounding natural vegetation communities. The Project sites are surrounded by a large contiguous area of open space dominated by moderate quality grassland, coastal sage scrub, and chaparral habitats capable of supporting NCCP-species. Therefore, these Project sites will be considered as Preserve quality for mitigation purposes.

Impacts to sensitive habitat types will be mitigated according to specifications outlined in Table 7.4 of the SDG&E NCCP and the project's FEIR, which in some cases may require mitigation above and beyond what is required by SDG&E's NCCP. Temporary impacts to sensitive habitat types will be mitigated through a project-specific Habitat Restoration Plan based on the requirements found in the SDG&E Enhancement and Monitoring Program described in Section 7.2 of the NCCP and the project's FEIR. While Table 7.4 of the SDG&E NCCP would not require mitigation for sites within a Preserve experiencing less than 500 square feet of temporary impacts to sensitive habitats, the project's FEIR does require mitigation for these impacts. Accordingly, SDG&E will mitigate for all 1,735 square feet of temporary impacts to sensitive habitat types located within a Preserve in accordance with the Project-specific Habitat Restoration Plan.

Attachment 4: Cultural Memorandum



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September 06, 2017

Rachel Ruston
SDG&E Environmental Project Management
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Subject: Letter Report: Minor Project Refinement 8, Sycamore to Peñasquitos 230-kV Transmission Line, San Diego, California.

Dear Ms. Ruston:

This letter report prepared by AECOM documents the cultural resources survey investigation for Minor Project Refinement Number 8 (MPR 8) for San Diego Gas & Electric (SDG&E)'s Sycamore to Peñasquitos 230-kV Transmission Line Project (SX-PQ). The proposed MPR 8 consists of 16 poles (Z479055 to Z479040) and 14 guard structure locations (GS19 to GS32) that extend approximately two miles south of the current SX-PQ project. The proposed MPR 8 is located near the community of Sorrento Valley and on Marine Corps Air Station (MCAS) Miramar in the City of San Diego, California. In compliance with the requirements of Section 106 of the National Historic Preservation Act and the California Environmental Quality Act, AECOM conducted a cultural resources desktop review and survey for the proposed addition to the SX-PQ project. Only Z479053, Z479054, Z479055, GS23, GS31, and GS32 were intensively surveyed during the current project.

Two cultural resources (CA-SDI-10250 and P-37-024739) were updated during the survey effort and one new isolate was recorded (SXPQ-I-2). It is recommended that an Environmentally Sensitive Area (ESA) boundary should be erected to preserve resource CA-SDI-10250, while resource P-37-024739 shall be avoided. The isolate is located outside of the current proposed work area and will not be affected. In accordance with Mitigation Measure (MM) Cultural Resources-1, monitoring by an archaeological monitor and a Native American monitor is recommended if any ground disturbance is required during the proposed project at GS22, GS23, GS24, and GS25 and for initial set up at Z479053. If during monitoring, the AECOM Lead Cultural Resources Specialist determines a subsurface deposit is absent or unlikely, monitoring may cease.

Project Description

Under this proposed refinement, SDG&E seeks to add additional work locations at 16 poles and 14 guard structures (Attachment 1), extending approximately 2-miles south of the current project. The proposed work includes re-tensioning an existing line and installing temporary guard structures. While the re-tensioning activity requires only overhead work, the guard structures may include ground disturbing activities. Guard structures will be accomplished using one of four means:

- 1) Bucket truck staged under transmission line: a bucket truck will be staged under the transmission line to guard resources.

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- 2) Two poles on either side of the transmission line, direct buried into the ground: a two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2-3 feet in diameter and 6-8 feet deep. Poles will be installed and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.
- 3) Flower pot staged under the transmission line; a flower pot consists of an approximate 5 feet by 5 feet by 4 feet concrete base that holds up a temporary pole. The flower pot sits on level ground surface and no ground disturbance is needed for this type of installation.
- 4) Protective material installed on distribution lines: a bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

All construction equipment and supplies would remain within the proposed delineated work areas. Access to the work areas will be obtained through existing access roads.

Project Personnel

Shannon E. Foglia, M.A., RPA, served as principal investigator. The survey effort was conducted by Kyle Ports, M.A. RPA and Allana Griffin, B.A. from AECOM. Justin Linton from Redtail Monitoring and Research, Inc. (Red Tail) served as the Native American Monitor during the survey. This letter report was completed by Mr. Ports and Ms. Foglia.

Archival Research

Prior to the cultural resources monitoring by AECOM, SDG&E performed a search of the records on file at the South Coastal Information Center (SCIC) in January of 2017, provided to SDG&E under contract, and shared the results with AECOM. A supplemental records search was performed by SDG&E for previously recorded sites and previous survey reports within a 0.25-mile buffer of the proposed components in August 2017 because the proposed MPR 8 work areas are located outside of the original search area. The records search revealed that two cultural resources, CA-SDI-10250/P-37-010250 (prehistoric lithic scatter) and CA-SDI-11789/P-37-011789 (prehistoric lithic scatter), have been previously identified within 100 feet of the proposed MPR 8 work areas. Both will be avoided during construction.

MCAS Miramar is considered 100 percent inventoried and a further cultural resource survey of MCAS property is not needed. A desktop review of resources within the vicinity of MPR 8 work locations was performed. The desktop review occurred for Z479040 through Z479055, GS19 through GS22, and GS24 through GS30.

Field Survey and Results

An intensive pedestrian survey of the MPR 8 work locations on private land was conducted on August 17, 2017 by Kyle Ports, M.A., RPA, Allana Griffin, B.A. from AECOM, and Justin Linton from Redtail. The

survey was performed by surveying a 98 feet radius surrounding three of the poles, Z479053, Z479054, and Z479055, in order to identify any surface cultural resources. On August 25, 2017, a field visit was conducted by Shannon E. Foglia, M.A., RPA with SDG&E, AECOM, and Wilson, the construction contractor, to verify the work locations and survey the additional guard structures as needed. Only GS23, GS31, and GS32 were surveyed.

Of the 16 poles, 13 were located on MCAS Miramar property and were previously surveyed. Of the 14 guard structures three were located outside MCAS Miramar property and on heavily disturbed land. Access to poles and guard structures will be using existing access roads or overland travel; no new roads are planned for this project. During the survey one new resource was observed and two resources were updated. Table 1 presents the field survey results and recommendations during construction.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479040	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479041	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479042	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479043	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479044	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479045	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479046	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479047	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479048	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479049	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479050	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479051	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479052	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479053	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; positive.	Avoid resource; establish ESA at CA-SDI-10250. A qualified archaeologist and Native American monitor should monitor the initial use and set up of the work area.
Z479054	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
Z479055	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
GS19	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS20	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS21	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS22	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS23	Install guard structure	Dirt access road of Frost-March Place	Surveyed; positive.	Avoid P-37-024739; monitor. Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
GS24	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS25	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS26	Install guard structure	Nobel Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS27	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS28	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS29	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS30	Install guard structure	Dirt access road off Eastgate Mall	On MCAS Miramar; not surveyed. None.	None; low potential.
GS31	Install guard structure	Eastgate Mall	Surveyed; none.	None; low potential.
GS32	Install guard structure	Dirt access road off Eastgate Mall	Surveyed; none.	None; low potential.

CA-SDI-10250 (P-37-010250)

This resource consists of a prehistoric temporary camp with a lithic scatter that was first recorded by RBR & Associates in 1985 (Robbins Wade 1985). RBR & Associates also conducted test units and surface scrapes. The site comprises of a shallow subsurface deposit with manos, scrapers, choppers, and bifacial knives (Perry and Tift 1985). In 1995, Gallegos & Associates expanded the site boundaries after recording flakes and stone tools west of the original site. ASM Affiliates returned to the site in 2002 to perform a subsurface testing program at the site. They recommended the site as not significant (Palette 2002); based on this result, the site is not eligible for listing on the California Register of Historic Resources (CRHR). July Roy from AECOM visited the site in 2015 and did not relocate any artifacts within the portion of the site surveyed.

During the current survey, two prehistoric artifacts were recorded just west of the site boundary. The assemblage consisted of a lithic tool and one mano. These artifacts are likely no longer in situ based on the location of the finds. The current site boundary will be extended to include the new artifacts recorded.

P-37-024739

This resource is comprised of a newly documented segment of the Atchison, Topeka and Santa Fe (AT&SF) Railroad. The railroad has been recorded under P-37-024739 elsewhere in the county. P-37-024739 was originally recorded in 2002 by CRM Tech (Ballester and Woodard 2002). It consists of the AT&SF Railroad, originally called the California Southern Railroad that was first constructed in 1880-1888. The AT&SF Railroad played a role in the development of San Diego County from 1880-1920. The resource was previously determined eligible for the National Register of Historic Resources in 1998, as well as recommended eligible for the CRHR and the City of San Diego's Register of Historic Resources (Daly 2015). The current segment was identified during desktop review. The project will avoid impacts to the railroad.

SXPQ-I-2

This prehistoric isolate consists of a mano located approximately 15-meters southwest of an existing pole. The isolate was discovered amongst a small pile of broken cobbles on the shoulder of an access road. The vegetation consisted of small shrubs, and tall weeds. The isolate is located just outside the work area boundary and will not be impacted.

Cultural Resources Results and Recommendations

Based on the archival research conducted by SDG&E and the pedestrian survey conducted by AECOM, one cultural resource (SXPQ-I-2) was recorded and two sites (CA-SDI-10250 and P-37-024739) were updated during the current survey. The isolate is not eligible for the CRHR. The isolate is located outside of the current proposed work area and will not be impacted. CA-SDI-10250 has been subject to archaeological testing and was previously recommended as not eligible for the CRHR. The site will be avoided during construction. An ESA will be established at the site prior to work beginning. Resource P-37-024739 is a segment of an NRHP eligible railroad and it shall be avoided during construction activities. An ESA is not recommended at this location due to the fact that it is an active railroad. All resources will be recorded or updated on the appropriate Department of Parks and Recreation 523 forms and submitted to the SCIC at the completion of the project.

The current project area was not previously analyzed by the environmental impact report and it is not currently mapped for sensitivity of buried cultural resources. The CPUC Qualified Archaeologist reviewed each work location with proposed ground disturbance and its potential to impact buried resources. Most of the guard structures are along well developed roads. Excavation will likely be within fill material with a low potential for buried resources. Based upon previous analysis for potential for buried deposits, monitoring by a qualified archaeologist and Native American monitor was recommended at four guard structure locations (GS22, GS23, GS24, and GS25) that were near waterways or pre-existing resources. Additionally, initial work at Z479053 should be monitored and an ESA established at the work location. No further cultural resources work is recommended at the remaining 25 locations where pedestrian survey and previous surveys have indicated that it is unlikely that subsurface cultural resources are present in the area proposed for activity or where only overhead work will occur.

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In the event that cultural resources are encountered during overhead activities, work in the immediate vicinity will be suspended within 50 feet of the find until the discovery is assessed by a qualified archaeologist, SDG&E archaeologists are contacted, and treatment is determined. Although there is no evidence to suggest the presence of human remains, in the unlikely event that human remains are encountered during overhead activities, all work will cease within 50 feet and the county coroner will be contacted, per the California Public Resources Code. MM-Cultural Resources-4 will be followed. A copy of this letter report will be sent to the SCIC.

Yours sincerely,



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cc: Jennifer Kaminsky (SDG&E), Edith Moreno (SDG&E), Michelle Fehrensén (AECOM), Chelsea Ohanesian (AECOM), and J. Lennox (SCIC)

References:

- ASM Affiliates, Inc.
2002 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Ballester, Daniel and Teresa Woodard
2002 Site update form of P-37-024739. On file at the South Central Coastal Information Center.
- Daly, Pamela
2015 Historic Resource Technical Report for the Chollas Creek Multi-use Path to Bayshore Bikeway Project, San Diego, California.
- Perry, J. and L. Tift
1996 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Robbins Wade, Mary
1985 Site form of CA-SDI-10250. On file at the South Central Coastal Information Center.

Attachments:



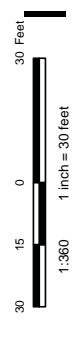
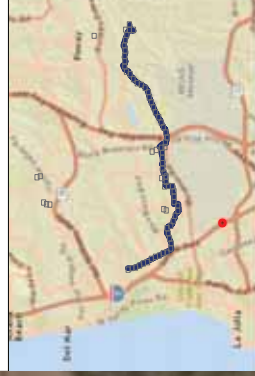
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MPR 8 Temporary Work Areas



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



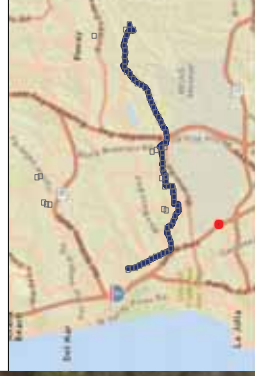
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479040**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



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1:480 1 inch = 40 feet

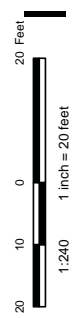
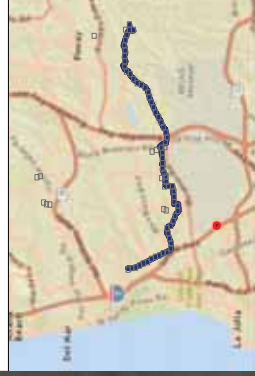
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479041**

9/1/2017



Legend

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- - - Access Road
- Temporary Work Area



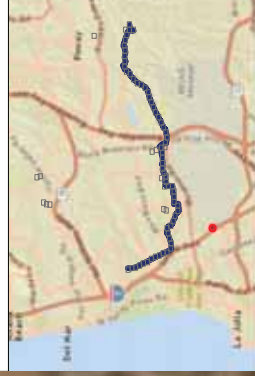
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230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479042**

9/1/2017



Legend

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- - - Access Road
- Temporary Work Area



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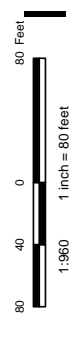
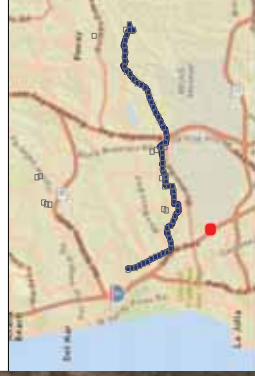
**Sycamore to Peñasquitos
 230kV Transmission Line Project
 Proposed Refinement Area - MPR 8
 Z479043**

9/1/2017



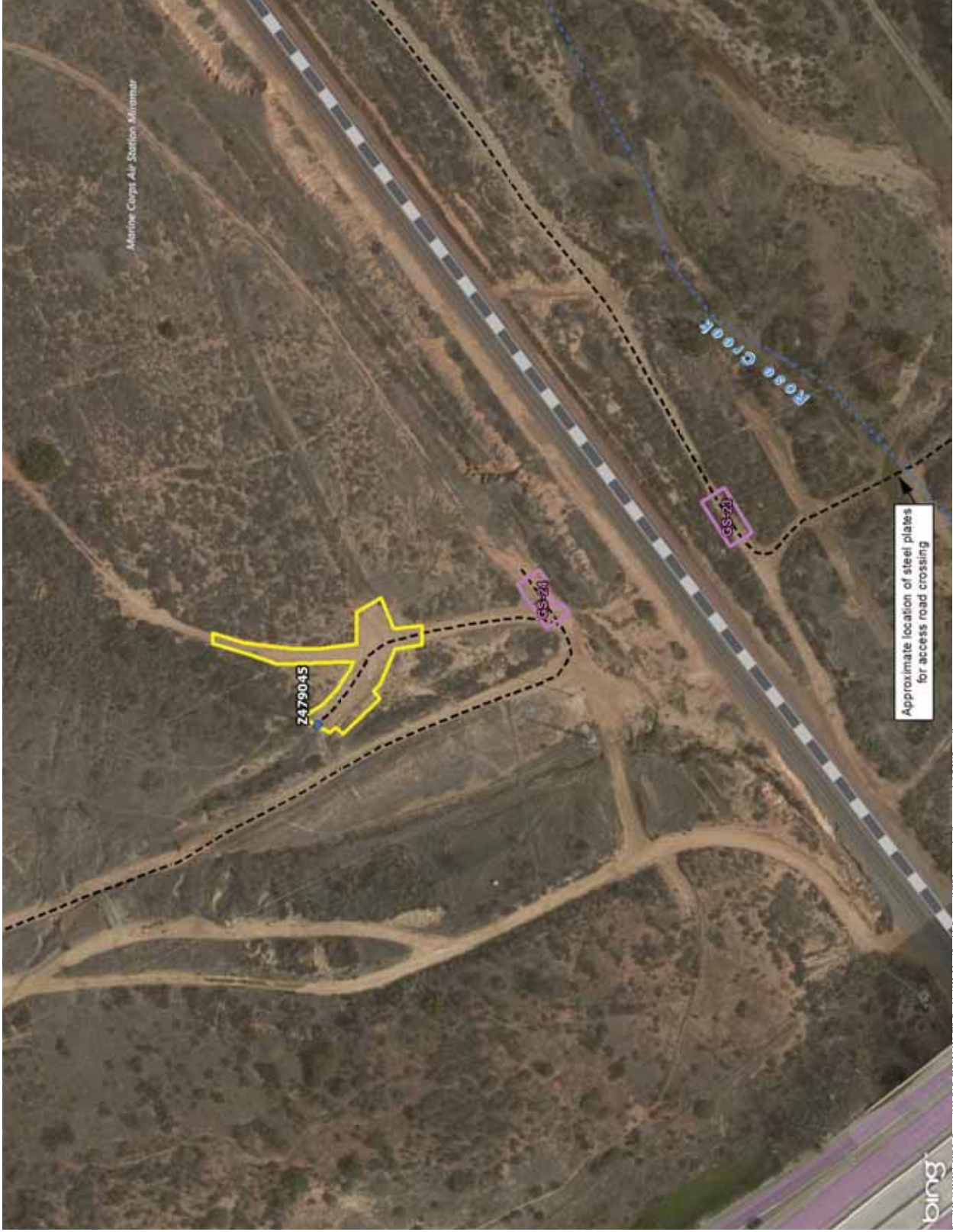
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- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- NHD Blue Line Stream



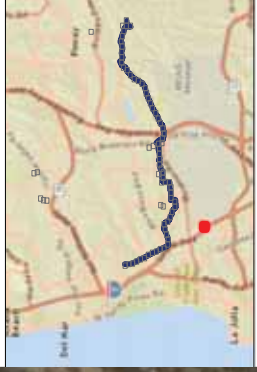
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479044**

9/7/2017



Legend

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- Temporary Work Area
- Guard Structure
- - - NHD Blue Line Stream



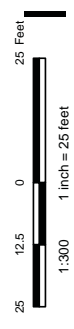
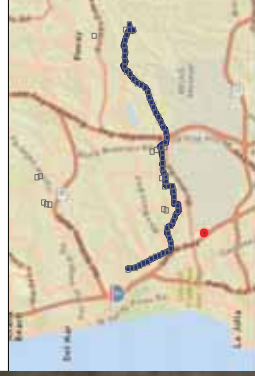
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479045**

9/7/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area

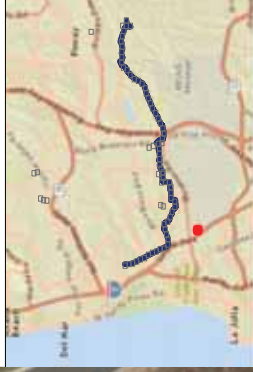


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479046**



Legend

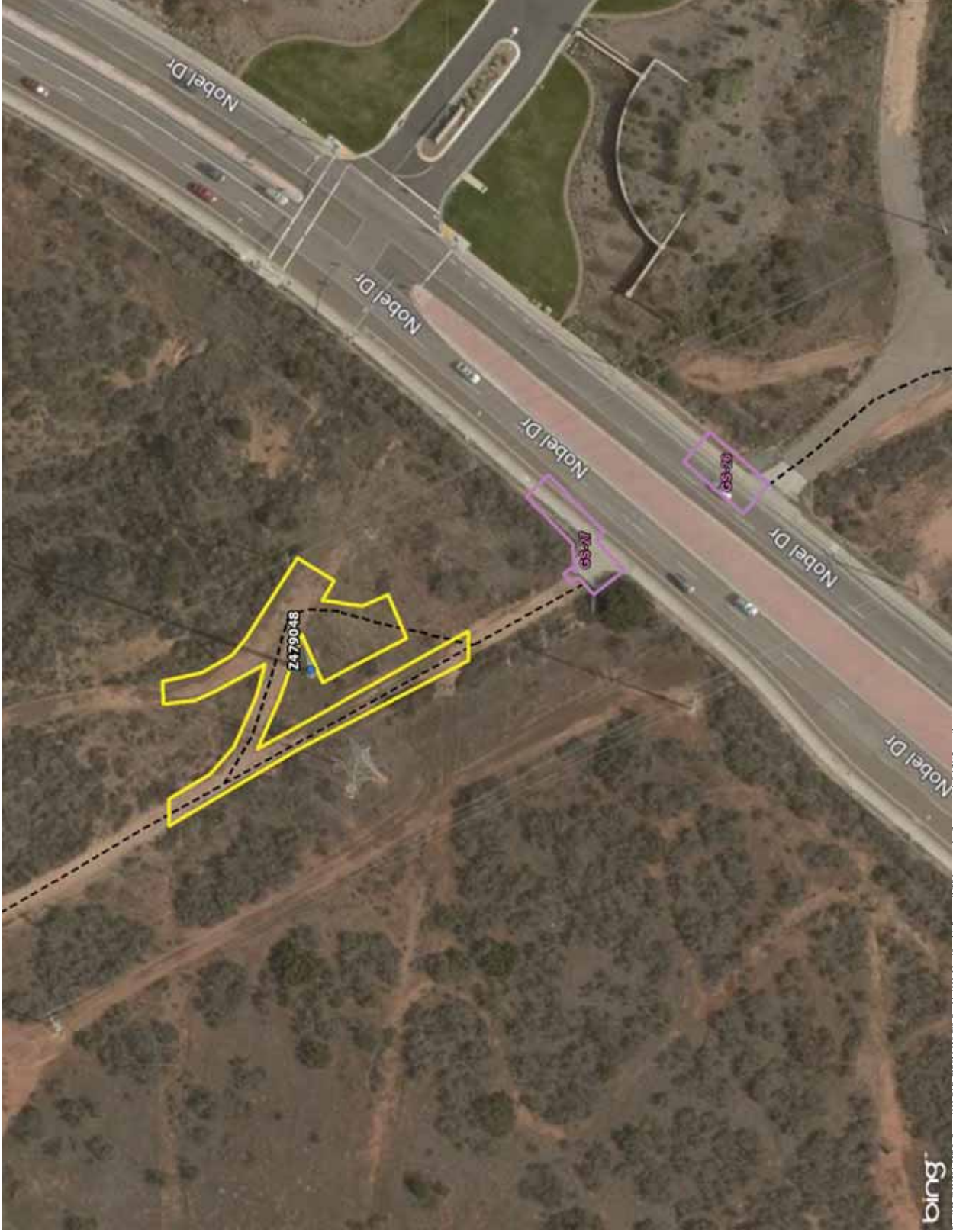
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- - - Access Road
- Temporary Work Area
- Guard Structure



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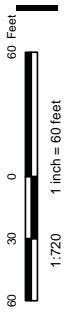
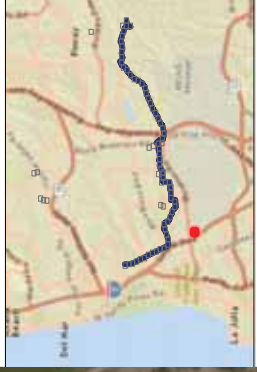
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479047**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479048**

9/1/2017



Legend

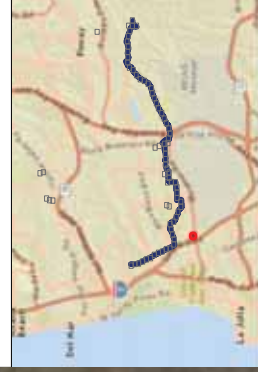
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- Temporary Work Area
- Guard Structure

Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479049



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



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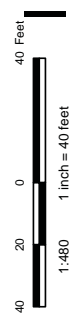
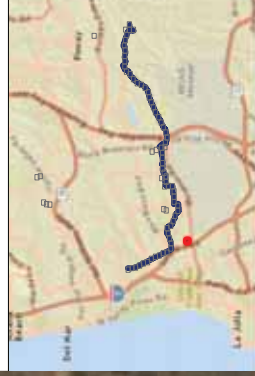
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479050**

9/1/2017



Legend

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- Temporary Work Area



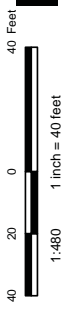
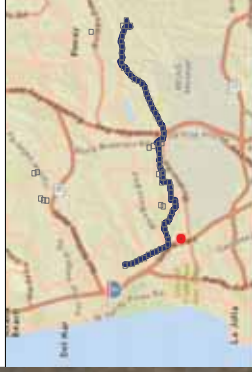
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479051**

9/1/2017



Legend

- (MPR 8 Poles
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- Temporary Work Area
- Guard Structure



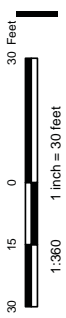
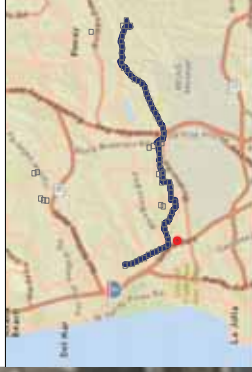
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479052**

9/1/2017



Legend

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- - - Access Road
- Temporary Work Area



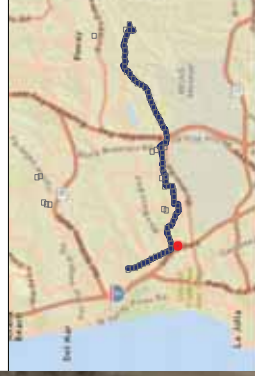
**Sycamore to Peñasquitos
230 kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479053**

9/1/2017



Legend

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- Temporary Work Area
- Guard Structure

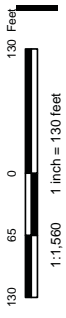
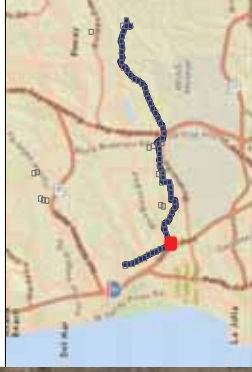


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479054**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- FEIR Work Area
- Stations
- Segment B
- Segment 5, Section 1
- Segment 5, Section 2
- / AC Mitigation Location
- Retaining Wall
- Permanent Impact
- Underground Vault
- Approved Temporary Work Space



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479055**

9/7/2017

Attachment 5: Paleontological Records Search Memorandum



September 6, 2017

Kyle Ports, M.A., RPA
Archaeologist
AECOM
401 West A Street, Suite 1200
San Diego, CA 92101

RE: Paleontological Resources Memo for the SDG&E SX-PQ Minor Project Refinement 8 for Poles Z479055 to Z4790404

Dear Mr. Ports:

This paleontological memorandum evaluates the potential impacts on paleontological resources associated with Minor Project Refinement (MPR) 8 for the San Diego Gas and Electric (SDG&E) Sycamore to Peñasquitos (SX-PQ) 230 kV Transmission Line Project. The MPR is located between poles Z479055 and Z4790404, and extends approximately two miles south of the current SX-PQ project. It includes proposed temporary work areas to access 16 existing poles for wire re-tensioning and installation of 14 guard structure (GS) locations south of CC MM CP, use of existing access roads, and existing pads for pulling sites. Installation of guard structures at 14 work locations will use a combination of direct bury and bucket trucks. Ground disturbing activities are expected to be limited to the installation of direct bury guard structures, which will require auger holes that are 2-3 feet wide and 6-8 feet deep. The remainder of the proposed work activities are not anticipated to require ground disturbance. The paleontological analysis consisted of a review of geologic mapping by Kennedy and Tan, 2008, and a paleontological records search of the MPR alignment and 1/4-mile buffer at the San Diego Natural History Museum (SDNHM) (McComas 2017; Attachment A).

MPR 8 is primarily located in moderate sensitivity Quaternary (Pleistocene) very old paralic deposits (also referred to as Lindavista Formation), and high sensitivity Eocene Scripps Formation and Stadium Conglomerate (also referred to as the conglomerate tongue of the Friars Formation), with minor areas of low sensitivity later Quaternary (Holocene) alluvium deposits that overlie Scripps Formation (McComas, 2017; Kennedy and Tan, 2008). Moderate and high sensitivity deposits are mapped at the surface of guard structure locations GS-19 to GS-21, GS-24, and GS-26 to GS-32, and are likely present at shallow depths beneath the low sensitivity Holocene alluvium at GS-22 and GS-23. All of the geologic units within MPR 8 occur elsewhere in the SX-PQ alignment, and are described in detail in the project's Draft Environmental Impact Report (Panorama Environmental, Inc., 2015). The SDNHM reported that there six localities from the Scripps Formation within a 1/4-mile radius of the MPR 8 alignment (McComas, 2017); however none are within the proposed work areas. The six localities produced fossil leaves and marine invertebrates including snails, clams, crabs, and sea urchins (McComas, 2017).

Based on the results of the analysis, MPR 8 has the potential to result in impacts to paleontological resources during direct bury guard structure excavation into native sediments at all of the 14 proposed locations. The

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remainder of the work proposed by MPR 8 is not anticipated to result in impacts to paleontological resources since 1.) the proposed work locations are on developed/previously disturbed areas, 2.) there is no new ground disturbance associated with re-tensioning the lines or guard structures using bucket trucks, and 3.) there are no known fossil localities within the proposed work areas. Monitoring and fossil recovery will be implemented in accordance with Mitigation Measures Paleontology-1 through 3 during ground disturbance related to installation of direct bury guard structures, and in the event that unanticipated fossils are encountered.

If you have any questions concerning the results for this study, please contact me at crichards@paleosolutions.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Courtney Richards'.

Courtney Richards, M.S.
Principal Paleontologist
Paleo Solutions, Inc.

REFERENCES

- Kennedy, M.P. and S.S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, scale 1:100,000.
- Panorama Environmental, Inc. 2015. Sycamore-Penasquitos 230-kV Transmission Line Project Draft Environmental Impact Report. State Clearinghouse No. 2014081031. Dated September 2015.
- McComas. K. 2017. Paleontological Records Search – SX-PQ Project. Paleontological records search conducted by the San Diego Natural History Museum. Letter results dated 15 August 2017.



ATTACHMENT A: SDNHM Record Search Results

Confidential Appendix Removed

ATTACHMENT C

Determination Letter on MPR #8

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 16, 2017

Ms. Jennifer Kaminsky
San Diego Gas and Electric Company
1010 Tavern Road
Alpine, CA 91901

RE: Sycamore- Peñasquitos 230-kV Transmission Line Project—Denial of Minor Project Refinement #8 Request

Dear Ms. Kaminsky,

On September 13, 2017, SDG&E submitted Minor Project Refinement (MPR) #8 for approval by the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Project). MPR #8 would add temporary work area around 16 poles and 14 guard structures over a 2-mile existing transmission alignment south of Carroll Canyon Road and east of Interstate 805.

The CPUC Energy Division may approve requests by SDG&E for MPRs that may be necessary due to final engineering of the environmentally superior project, as ordered in the Decision Granting Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-kV Transmission Line Project (Decision 16-10-005), so long as such minor project refinements "...are located within the geographic boundary of the study area of the EIR and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement."

The CPUC finds that the proposed work spaces associated with MPR #8 are outside of the geographic boundary of the EIR study area; therefore, an application for a Petition for Modification (PFM) must be submitted. Please note that SDG&E's pending responses to data request #2 remain relevant as the information is needed for our determination of whether to prepare an Addendum or a Supplemental EIR as part of the PFM review process.

Please contact me if you have any questions or concerns regarding this decision.

Sincerely,

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

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Molly Sterkel, CPUC Program Manager
Lonn Maier, CPUC Supervisor
Marcelo Poirier, CPUC Attorney
Jason Reiger, CPUC Attorney
Jeff Thomas, Panorama Environmental
Sheila Hoyer, Panorama Environmental
Edith Moreno, SDG&E
Ron Walker, AECOM

ATTACHMENT D

Environmental Assessment

**SYCAMORE TO PENASQUITOS 230-KV
PROPOSED PROJECT MODIFICATION
SAN DIEGO, CALIFORNIA**

Prepared for:

San Diego Gas & Electric
8315 Century Park Court
San Diego, California 92123-1548
Phone: (858) 654-1239

Prepared by:

AECOM
401 West A Street, Suite 1200
San Diego, California 92101
Phone: (619) 610-7600
Fax: (619) 610-7601

August 2018

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ACRONYMS

AB	Assembly Bill
APM	Applicant Proposed Measure
AT&SF	Atchison, Topeka and Santa Fe
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan CARB California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHRIS	California Historic Resources Information System
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Database
COI	Change of Information
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CTMP	Construction Transportation Management Plan
FEIR	Final Environmental Impact Report
ft.	feet
GHG	greenhouse gas
GS	guard structures
HSCERP	Hazardous Substance Control Emergency and Response Plan
I	Interstate
kV	kilovolt
MCAS	Marine Corps Air Station
MM	Mitigation Measure
MPR	Minor Project Refinement
MSCP	Multiple Species Conservation Program
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NO _x	nitrogen oxides
NRHP	National Register of Historic Places
O&M	operation and maintenance
O ₃	ozone
PFM	Petition for Modification
PM ₁₀	particulate matter up to 10 micrometers in size
PM _{2.5}	particulate matter up to 2.5 micrometers in size
PRC	Public Resources Code
PSA	Project Survey Area
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric Company

SDNHM	San Diego Natural History Museum
SDSURF	San Diego State University Research Foundation
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SX-PQ	Sycamore-Peñasquitos
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TMDL	Total Maximum Daily Load
TSP	Tubular Steel Pole
U.S.	United States
USACE	U.S. Army Corps of Engineers
VOC	volatile organic compound

1. INTRODUCTION

San Diego Gas & Electric Company (SDG&E) is submitting a Petition for Modification to modify California Public Utilities Commission (CPUC) Decision 16-10-005. Decision 16-10-005 granted SDG&E a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt (kV) Transmission Line Project (Project), configured with Alternative 5. This Environmental Assessment (Assessment) has been developed to support the preparation of an addendum to the Project’s Final Environmental Impact Report (FEIR) (State Clearinghouse Number 2014081031) for the requested modifications to the Decision (herein referred to as the Proposed Project Modification) in accordance with the California Environmental Quality Act (CEQA).

Under the Proposed Project Modification, SDG&E is seeking authorization to re-tension and sag the existing 230-kV overhead transmission line that extends from CC MM CP (cable pole structure already a part of the approved Project) south to the next dead-end structure (Z479040). The Proposed Project Modification is needed to maintain line clearances and load on existing structures during varying wind, temperature, and weather conditions in order to provide reliable service to SDG&E customers. The Proposed Project Modification would be located within currently existing SDG&E right-of-way (ROW).

The Assessment analyzes the potential environmental impacts associated with the Proposed Project Modification. No new significant impacts would occur as a result of the Proposed Project Modification. As a result, no new Mitigation Measures (MMs) and/or Applicant Proposed Measures (APMs) are proposed. The Proposed Project Modification would implement existing MMs and APMs as applicable. Impacts resulting from operation and maintenance (O&M) activities are not analyzed in this Assessment, as the Proposed Project Modification includes work on an existing transmission line and no new permanent facilities would be installed as a result of the work.

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2. PROPOSED PROJECT MODIFICATION DESCRIPTION

This chapter describes the Proposed Project Modification’s location, objectives, and components; and explains how the Proposed Project Modification would be implemented. This chapter also identifies any permits or other approvals that may be needed to implement the Proposed Project Modification. Finally, this chapter identifies any measures proposed by SDG&E to avoid or minimize potential environmental impacts.

2.1 PROPOSED PROJECT MODIFICATION LOCATION

As shown in Figure 2-1, Proposed Project Modification Location Map, the Proposed Project Modification is located in San Diego County, California, within SDG&E ROW on Marine Corps Air Station (MCAS) Miramar, San Diego Metropolitan Transit Development Board, and Eastgate Industrial Center Owners Association Inc. property. It is situated approximately 22 miles north of the United States (U.S.) – Mexico border, 10 miles north of downtown San Diego, and just south of cable pole CC MM CP (part of approved Project)

2.2 PROPOSED PROJECT MODIFICATION DESCRIPTION

The Proposed Project Modification includes re-tensioning and sagging approximately two miles of the existing 230-kV transmission line south of cable pole CC MM CP to the next dead-end structure (Z479040) consisting of 16 Tubular Steel Poles (TSPs) and 16 spans. The temporary work areas and guard structure locations being requested in the Proposed Project Modification are shown in Figure 2-2. Approximately 0.43 acre of temporary work space would be utilized for guard structure installation and approximately 2.69 acres of temporary work space would be utilized around the existing TSPs (Z479040 and Z479055) to support the work.

The Proposed Project Modification includes the following activities:

- Use of existing access roads and pads;
- Minimal vegetation clearing and trimming around existing roads and pads;
- Re-tension and sag the existing 230-kV line from CC MP CP south to the next dead-end structure (Z479040) consisting of 16 TSPs and 16 spans;
- Use of the temporary work space and access road at the next dead-end structure (Z479040) as a pull site;
- Removal and replacement of existing dampers and wire clips;
- Use of standard traffic control methods where stringing occurs across public access roadways and railroads;
- Installation of 14 temporary guard structures to prevent any dropped conductor from coming into contact with pedestrians, vehicles, or utilities (e.g., distribution lines and communication facilities) located beneath the wire; and

- Performance of other work activities necessary to comply with Project requirements (e.g., watering for dust control);

2.3 PERMANENT LAND/RIGHT-OF-WAY REQUIREMENTS

The Proposed Project Modification areas are located within SDG&E ROW. This ROW occurs on MCAS Miramar, San Diego Metropolitan Transit Development Board, and Eastgate Industrial Center Owners Association Inc. property. Access and all work on the existing transmission line are covered under SDG&E's existing easement. SDG&E would provide the appropriate notifications to MCAS Miramar regarding construction activities within their property. The contractor would coordinate with Eastgate Industrial Center Owners Association Inc. for work within their property. In addition, SDG&E would obtain a Right of Entry Permit from the San Diego Metropolitan Transit Development Board for access and work at GS-23. SDG&E and the contractor would coordinate with Village Nurseries Wholesale, LLC, who leases the land from MCAS Miramar at locations Z479040, Z479041, Z479042, GS-19, and GS-20 to accommodate proposed construction activities.

2.4 TEMPORARY WORK AREAS

The Proposed Project Modification includes temporary work space around 16 existing 230-kV TSPs. Access to the TSPs is needed to provide the necessary work space for crews to unclip, pull, and reclip the existing conductor strung between structures Z479040 and Z479055. The total temporary work area needed for TSP access is approximately 2.70 acres. Dimensions, property owner information, and description of land cover for each TSP access area is summarized in Table 2.4-1 below. Vegetation present in temporary work areas would be crushed and/or trimmed to complete work. No grading is required for any temporary work areas. All temporary work areas would be restored, as described in Section 2.4.4, Cleanup and Post-Construction Restoration.



Source: SDGE, ESRI.

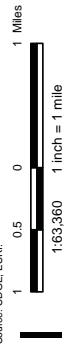
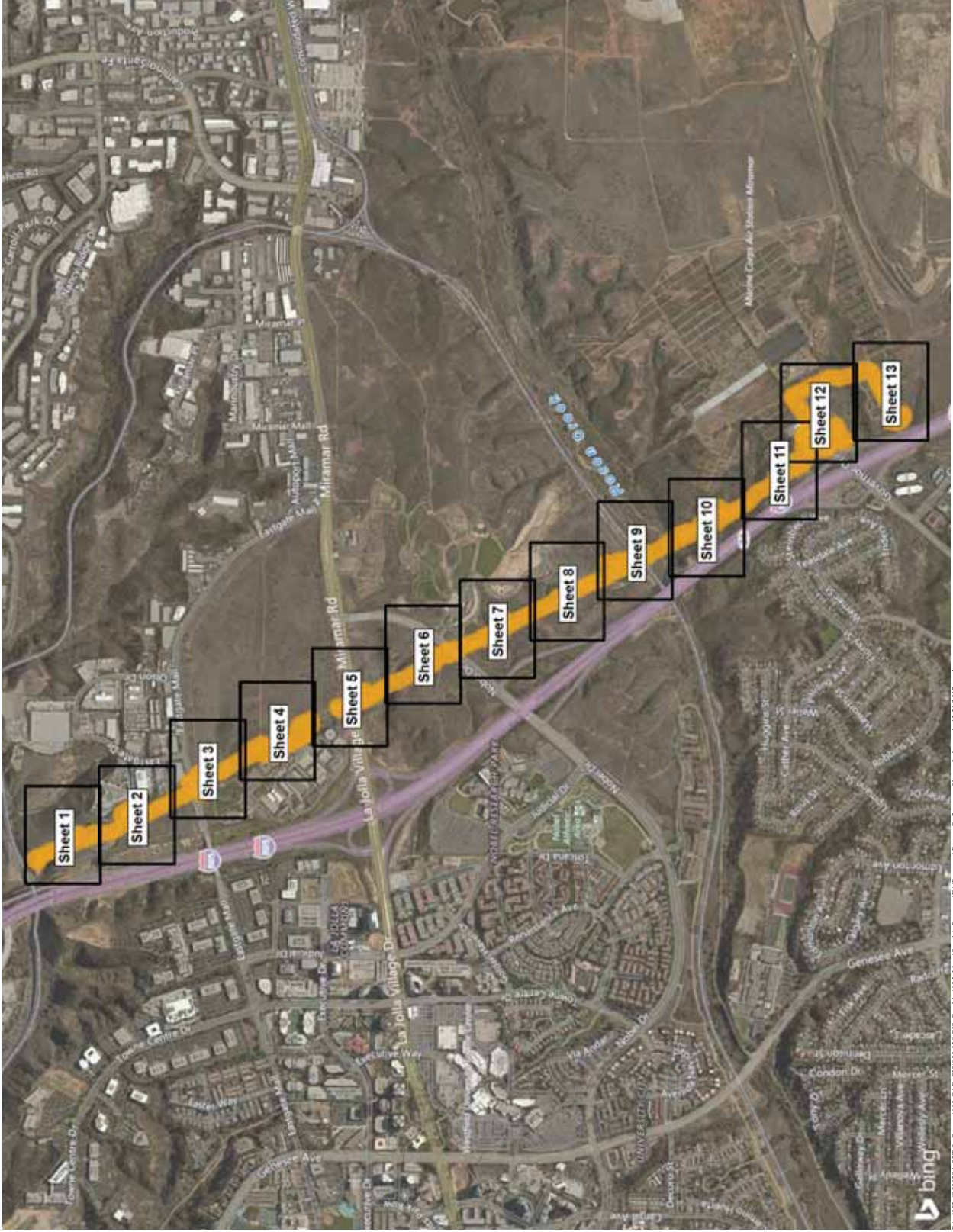


Figure 2-1
Proposed Project Refinement Location Map

SXPQ - Sycamore to Penasquitos 230kV Transmission Line Project

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Sheet Index

Proposed Project Refinement Area

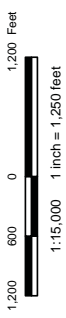
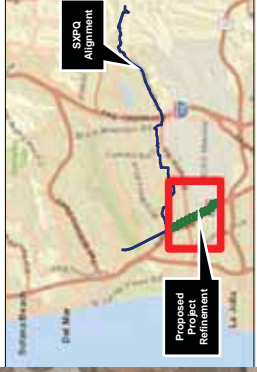


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet Index
12/21/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

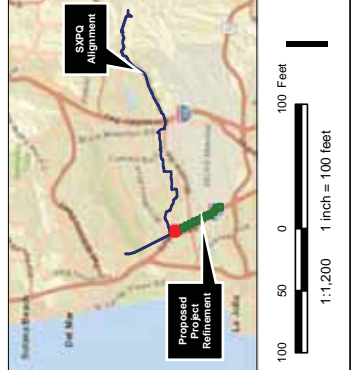
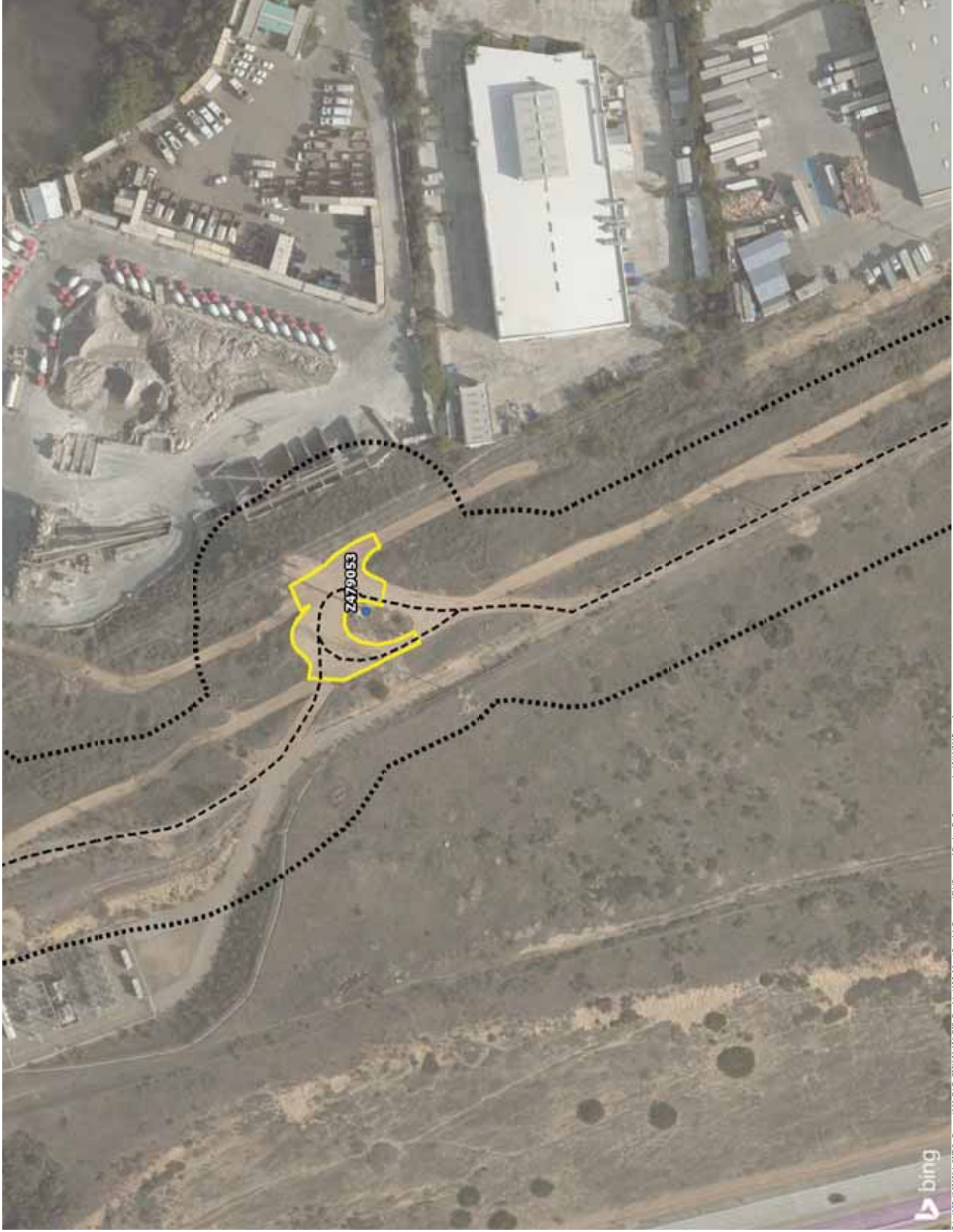


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 1
 12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer

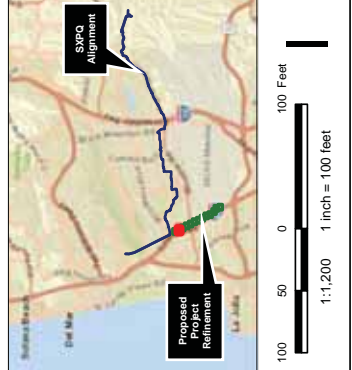
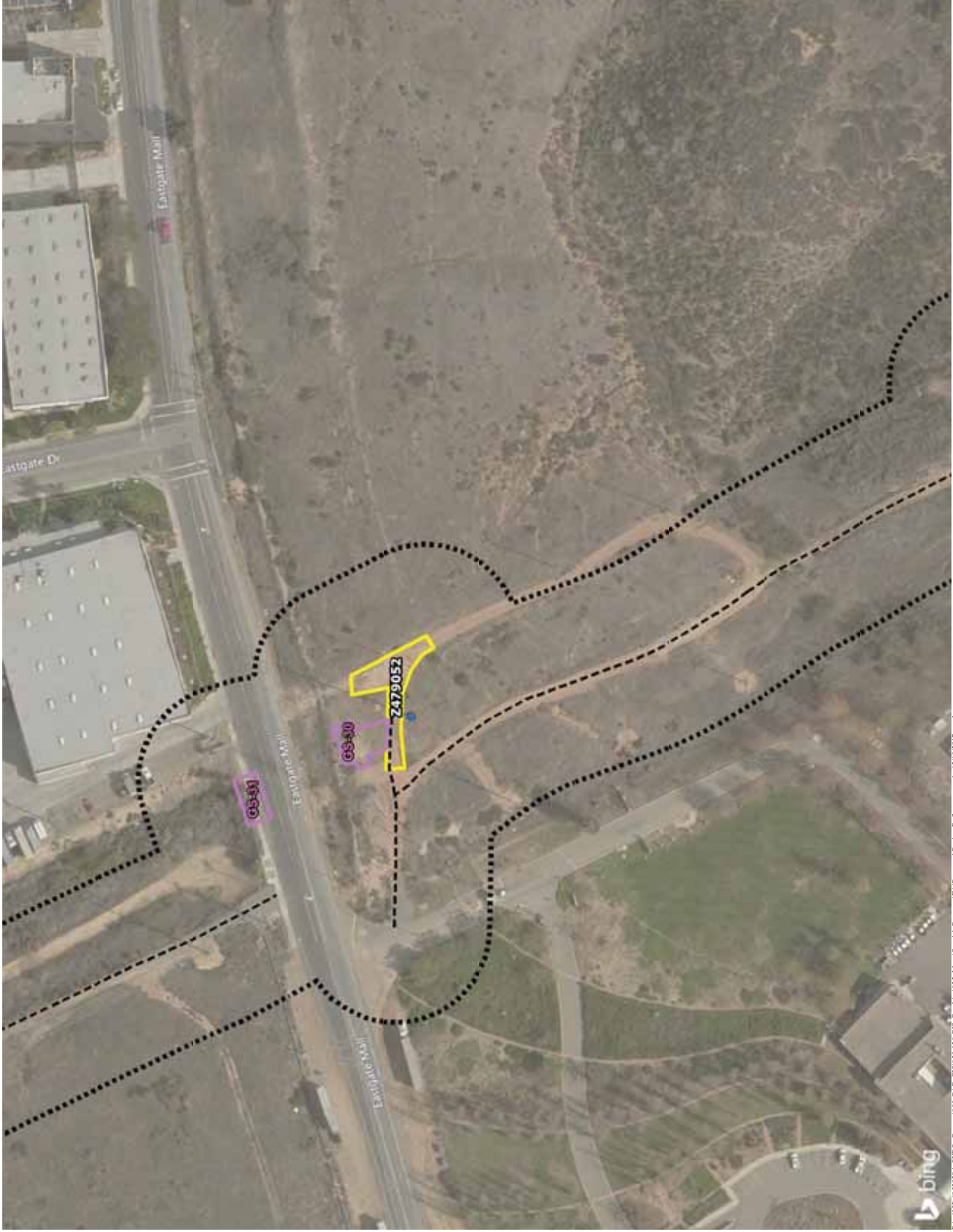


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 2

12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

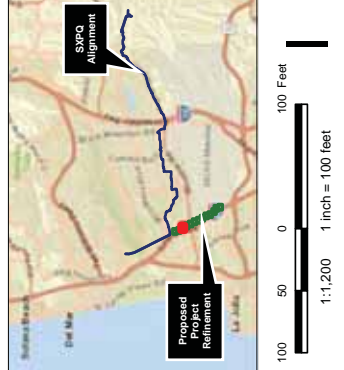
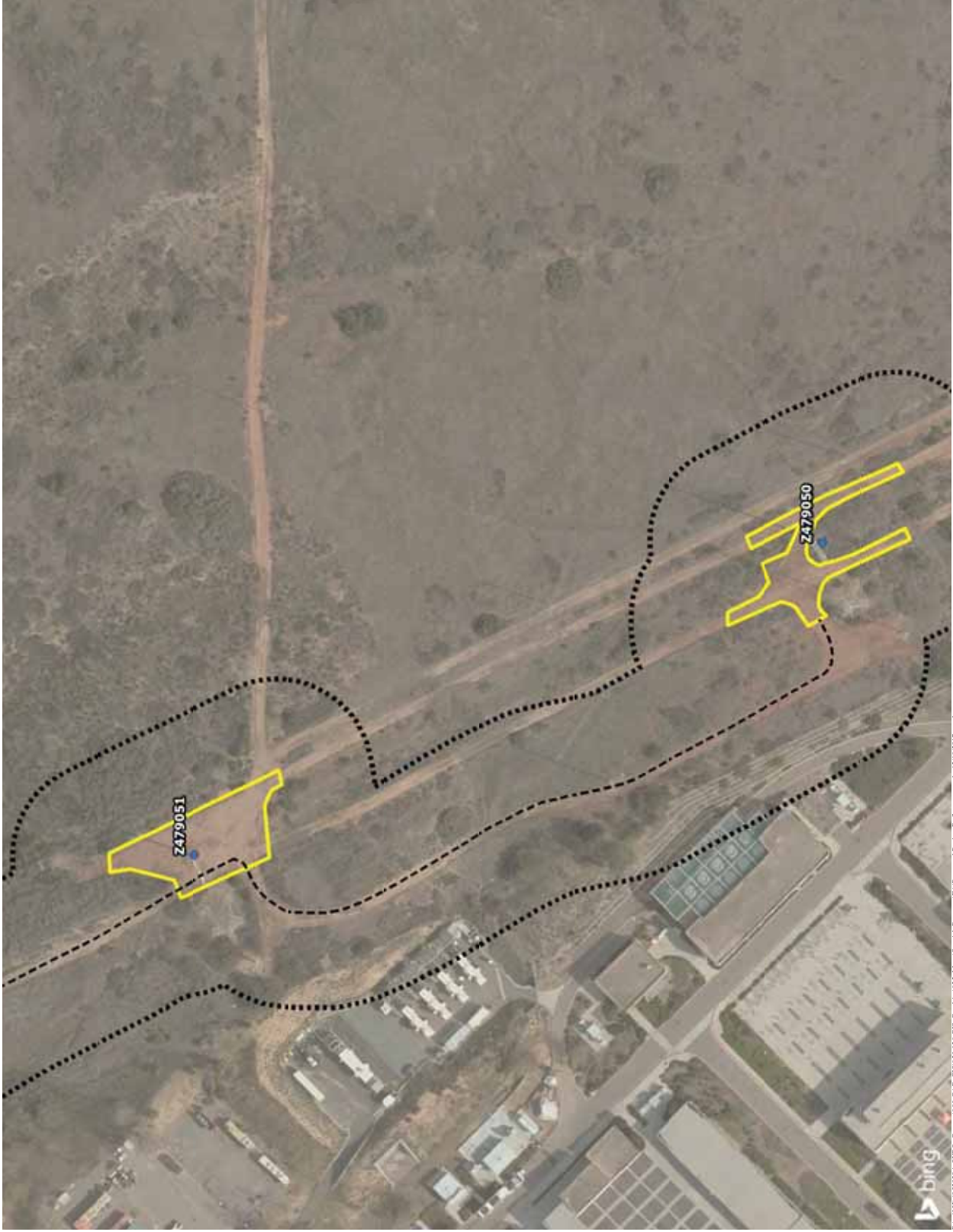


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 3
12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer

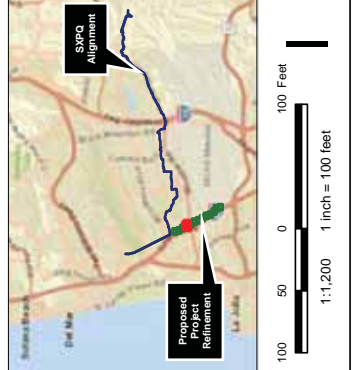
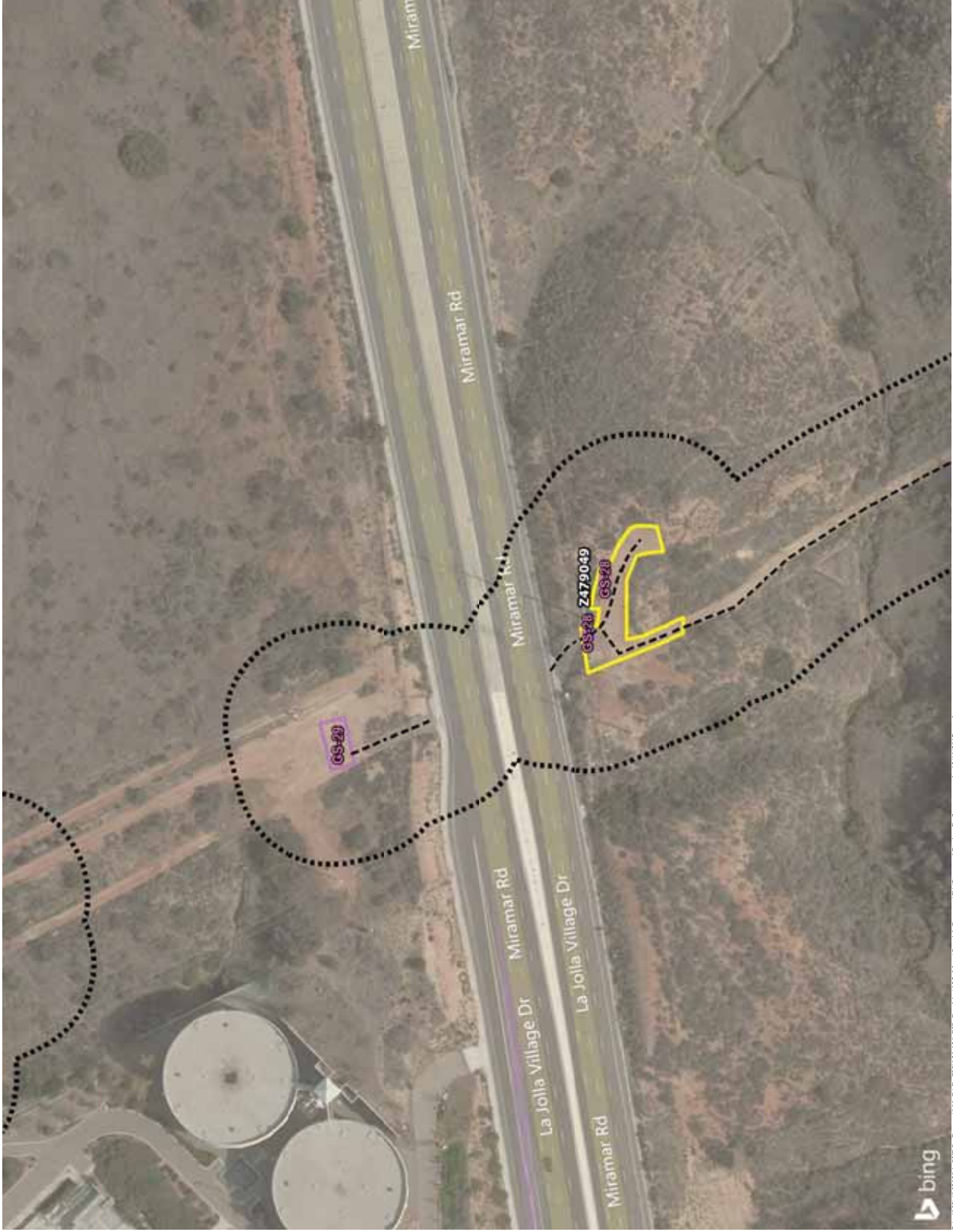


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 4
12/19/2017



- Legend**
- (Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

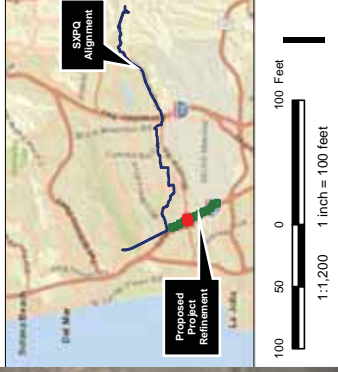
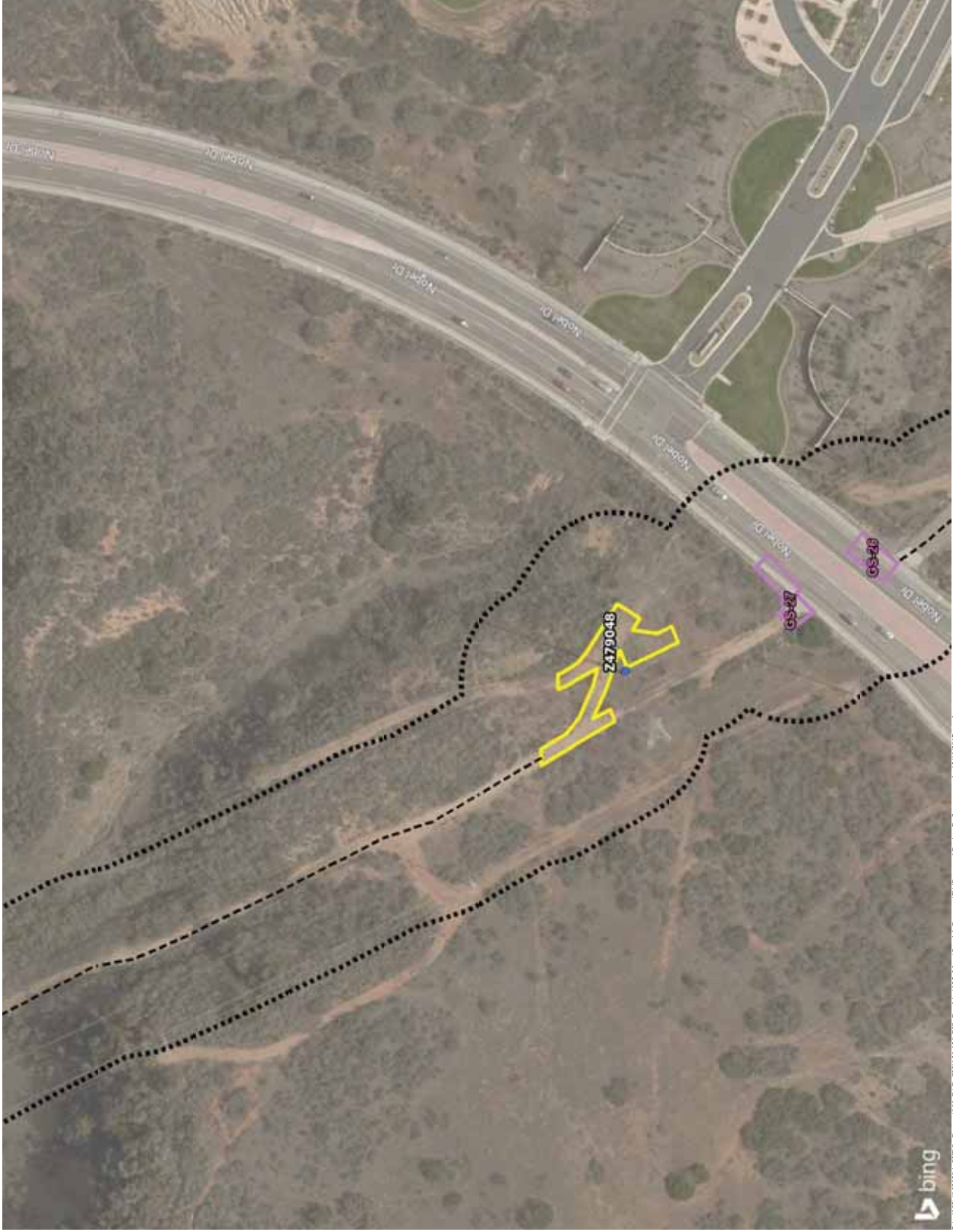


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 5
 12/19/2017



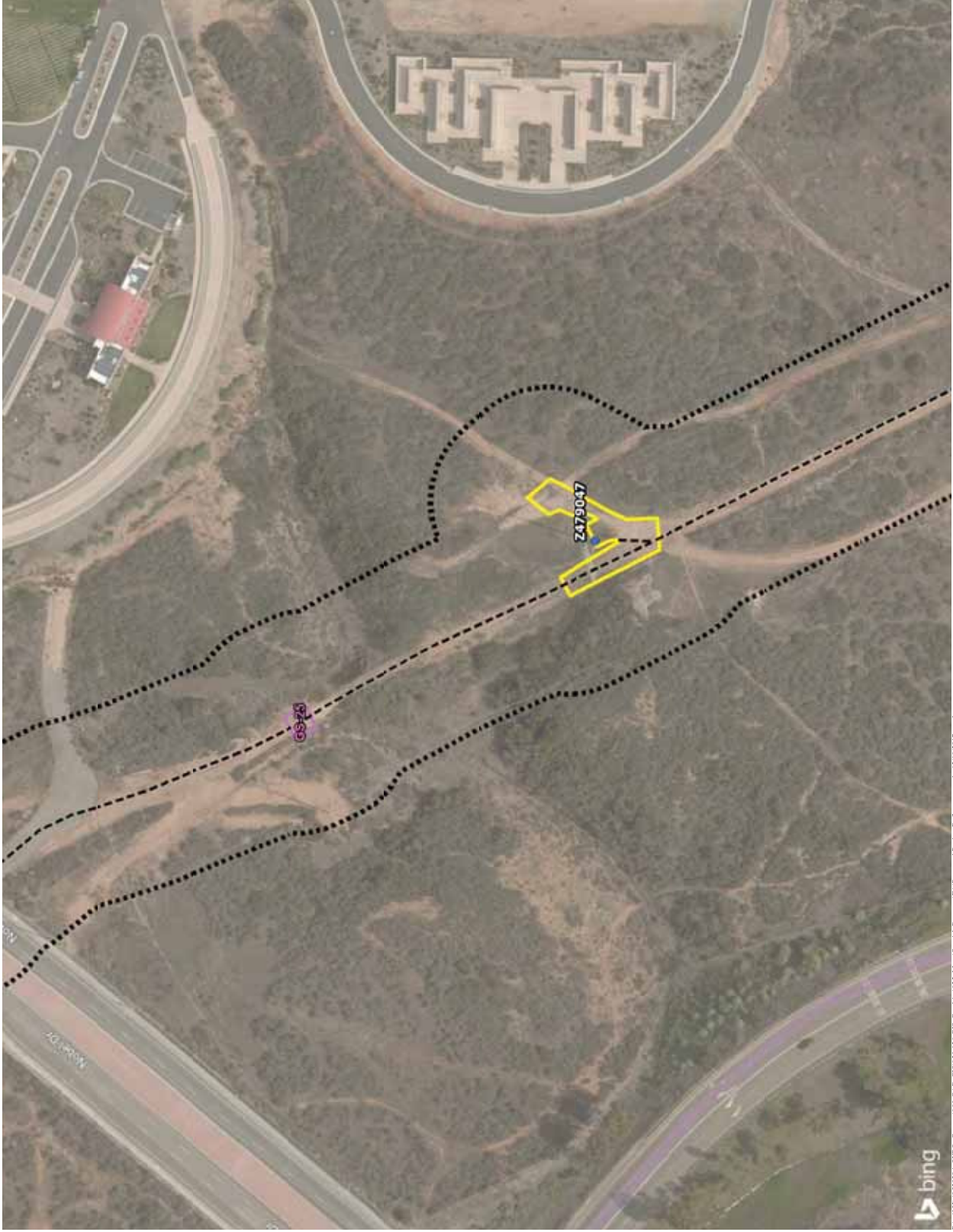
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- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 6

12/19/2017

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- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

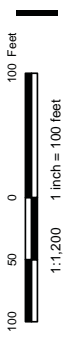


Figure 2-2
 Sycamore to Peñasquitos
 Proposed Project Refinement
 Detailed Mapbook Sheet 7
 12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer

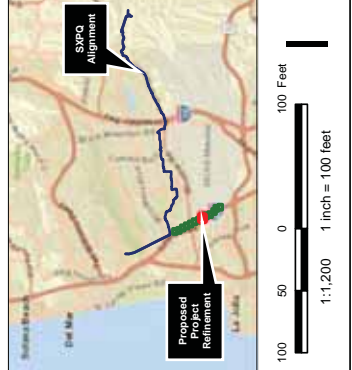
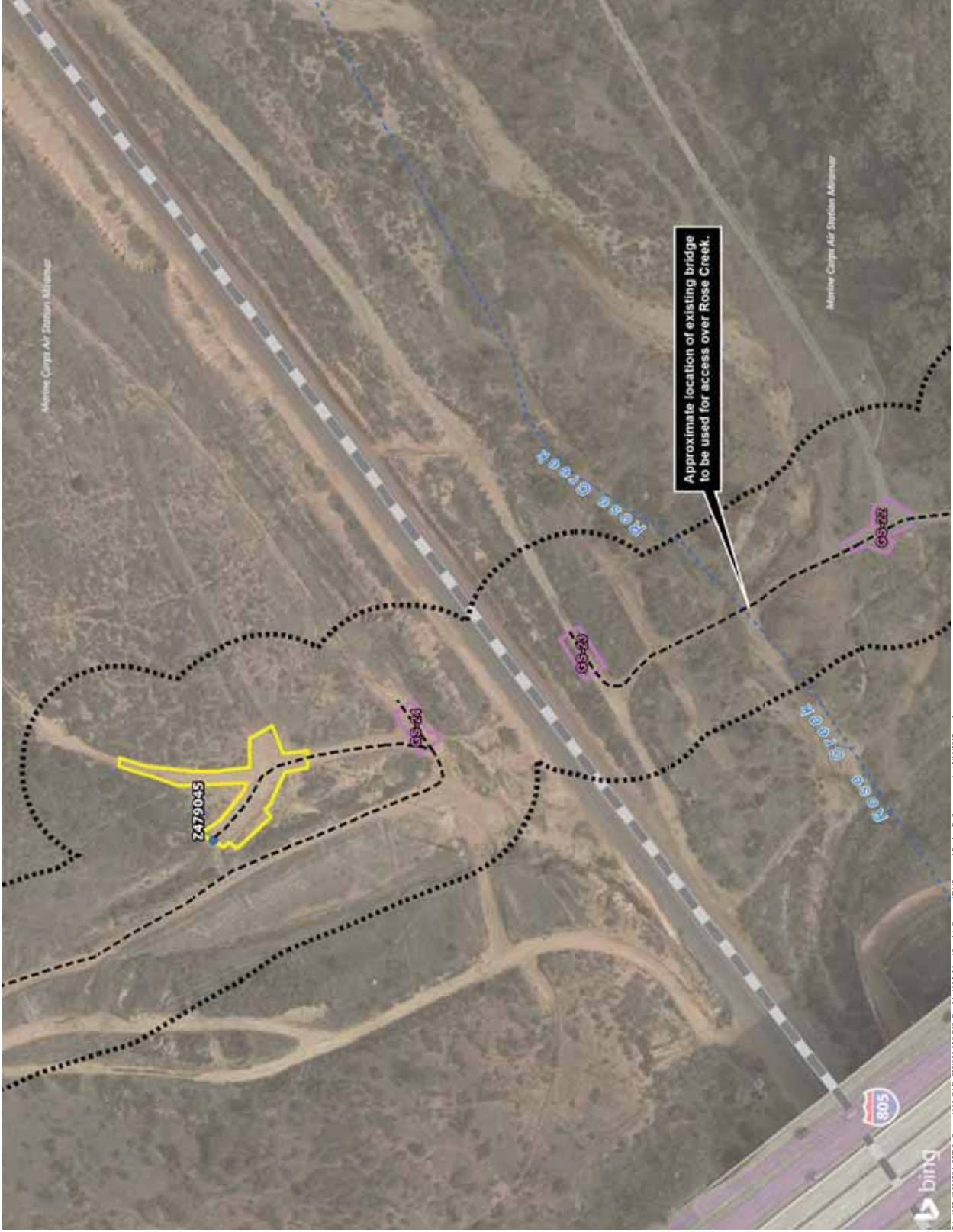


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 8
 12/19/2017

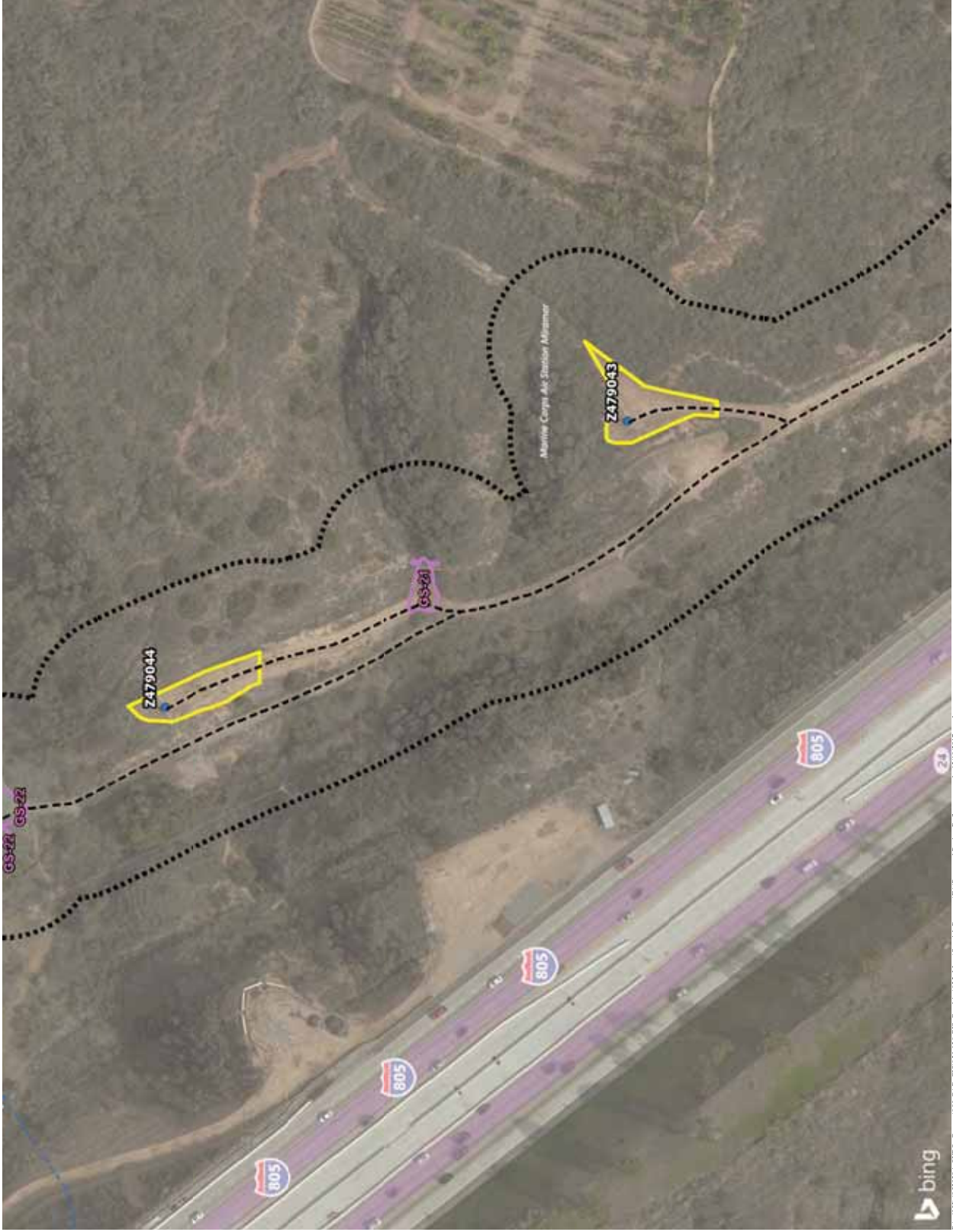


Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- NHD Blue Line Stream



Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 9
12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer
 - NHD Blue Line Stream

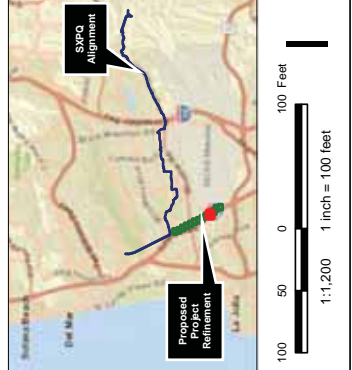


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 10
 12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer

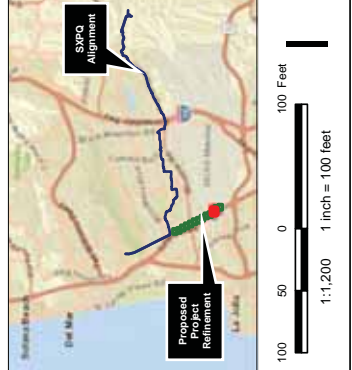
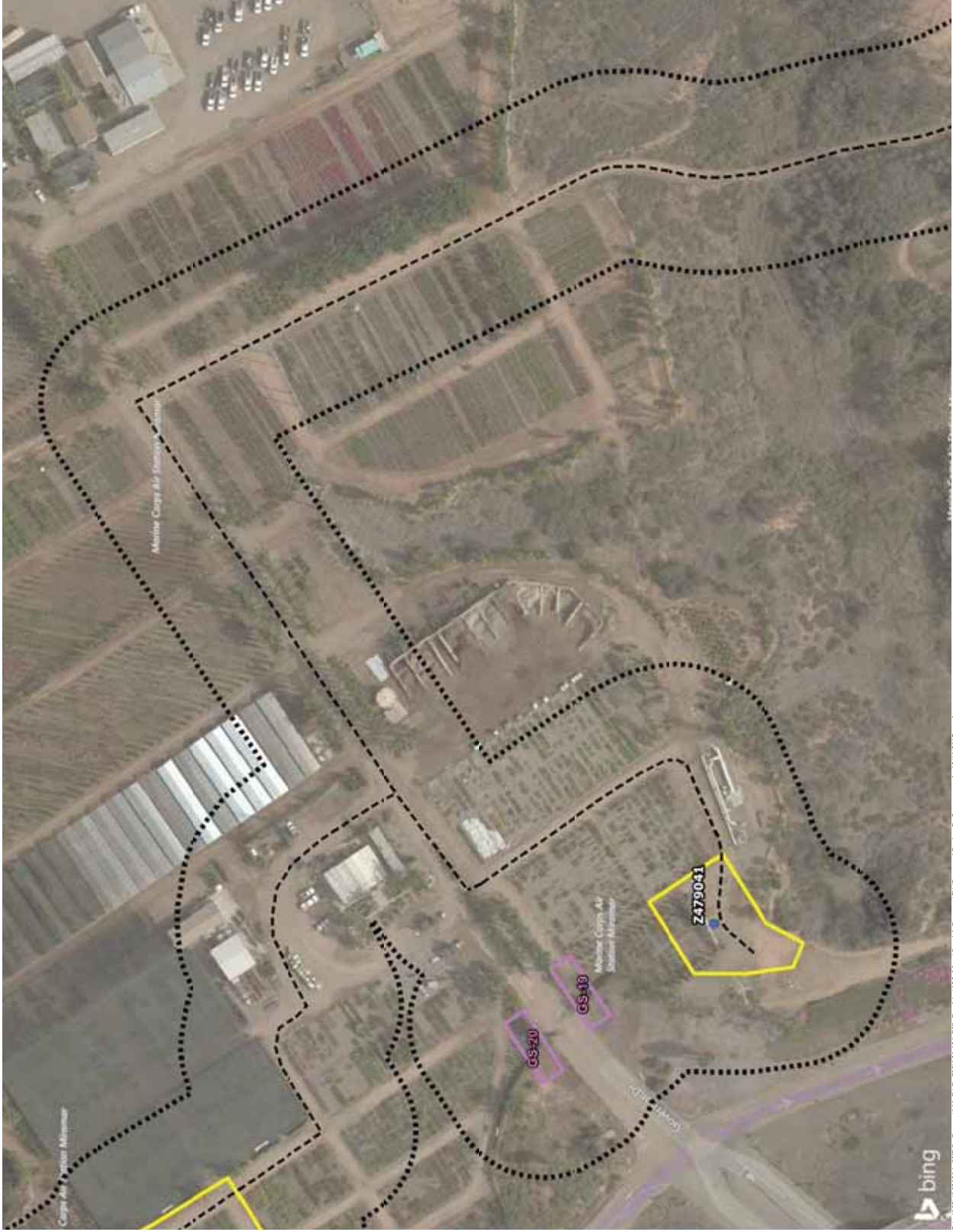


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 11

12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

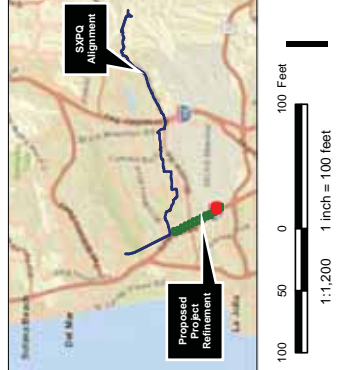


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 12
 12/19/2017



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer

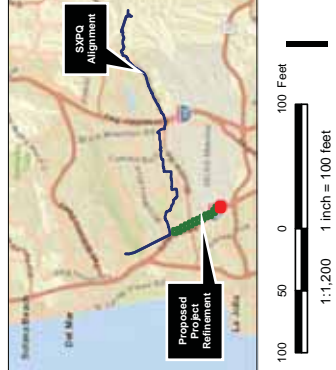


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 13
 12/19/2017

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Table 2.4-1: Pole Access Sites

TSP Number	Work Area (Acres) ¹	Approximate Work Area Dimensions	Property Owner	Vegetation/Land Cover
Z479055	0.06	66' x 69'	Eastgate Industrial Center Owners Association, Inc.	TSP is within disturbed vegetation. The associated work area consists of the existing dirt access road to the southeast of the TSP and includes portions of disturbed vegetation south of the TSP and east of the access road, which are dominated by non-native grasses and black mustard. The TSP and access road are surrounded by disturbed vegetation, as well as coastal sage scrub vegetation and grassland vegetation.
Z479054	0.10	50' x 134'	Eastgate Industrial Center Owners Association, Inc.	TSP is on bare ground. The associated work area consists of the existing dirt access road to the north of the TSP and a portion of disturbed vegetation beyond the road, which is dominated by non-native grasses and black mustard. The TSP and access road are surrounded by a mix of disturbed vegetation, coastal sage scrub vegetation, and grassland vegetation.
Z479053	0.22	117' x 121'	Eastgate Industrial Center Owners Association, Inc.	TSP is on bare ground. The associated work area consists of bare ground within the existing dirt access road/work pad. The TSP and access road are surrounded by a mix of disturbed vegetation, coastal sage scrub vegetation, and grassland vegetation.
Z479052	0.09	123' x 90'	MCAS Miramar	TSP is within disturbed vegetation. The associated work area consists of bare ground within the existing dirt access road to the north of the TSP. The TSP and access road are surrounded by a mix of disturbed vegetation and coastal sage scrub/chaparral mix vegetation.
Z479051	0.25	77' x 198'	MCAS Miramar	TSP and the associated work area are on bare ground within an existing access road/work pad and are surrounded by a mix of disturbed vegetation and coastal sage scrub/chaparral mix vegetation.
Z479050	0.18	114' x 212'	MCAS Miramar	TSP is within disturbed vegetation. The associated work area consists of the existing dirt access road, with a portion of coastal sage scrub vegetation to the north of the TSP and access road. The TSP and access road are surrounded by a mix of coastal sage scrub/chaparral mix vegetation and disturbed vegetation. Several naturally occurring vernal pools occur east of the access road to this TSP. However, this area would not be accessed for Project-related activities.
Z479049	0.14	128' x 108'	MCAS Miramar	TSP is within disturbed vegetation. The associated work area consists of the existing dirt access road/work pad, with a portion of coastal sage scrub vegetation to the east. The TSP and access road are surrounded by coastal sage scrub vegetation and disturbed vegetation.

TSP Number	Work Area (Acres) ¹	Approximate Work Area Dimensions	Property Owner	Vegetation/Land Cover
Z479048	0.21	107' x 217'	MCAS Miramar	TSP and associated work area are within disturbed vegetation dominated by non-native grasses and star thistle. The TSP and access road are surrounded by coastal sage scrub/chaparral mix vegetation and disturbed vegetation.
Z479047	0.16	120' x 164'	MCAS Miramar	TSP is within disturbed vegetation. The work area consists of the existing dirt access road/work pad, with a portion of disturbed vegetation to the south of the TSP and along the adjacent access road.
Z479046	0.08	45' x 159'	MCAS Miramar	TSP occurs in bare ground immediately adjacent to a dirt access road. The associated work area consists of the existing access road to the west of the TSP, with a portion of disturbed vegetation to the north of the TSP and along the adjacent access road, which is dominated by non-native grasses. The TSP and access road are surrounded on all sides by a mix of disturbed vegetation and coastal sage scrub vegetation.
Z479045	0.16	134' x 199'	MCAS Miramar	TSP is at the terminus of a spur road/work pad covered with disturbed vegetation dominated by black mustard and non-native grasses. Coastal sage scrub species have recruited within the work pad from the immediate surrounding areas. The associated work area consists of the existing work pad, with a portion of disturbed vegetation to the west of the work pad. The TSP and access road are surrounded on all sides by a mix of coastal sage scrub vegetation.
Z479044	0.10	38' x 136'	MCAS Miramar	TSP is at the terminus of a spur road/work pad covered with disturbed vegetation. The associated work area is entirely within the existing work pad. The TSP and access road are immediately surrounded in all directions by coastal sage scrub/chaparral mix vegetation.
Z479043	0.12	120' x 91'	MCAS Miramar	TSP is at the terminus of a spur road/work pad covered with disturbed vegetation dominated by non-native grasses. Coastal sage scrub species have recruited within the disturbed work pad. The associated work area is entirely within the existing work pad. The TSP and access road are immediately surrounded by coastal sage scrub/chaparral mix vegetation.
Z479042	0.24	97' x 106'	MCAS Miramar	TSP is on bare ground. The proposed work area contains potted nursery plants that would be temporarily relocated to accommodate construction activities at this location.
Z479041	0.26	121' x 92'	MCAS Miramar	TSP is on bare ground landscape/ornamental vegetation and potted nursery plants. The proposed work area contains potted nursery plants that would be temporarily relocated to accommodate construction activities at this location.

TSP Number	Work Area (Acres) ¹	Approximate Work Area Dimensions	Property Owner	Vegetation/Land Cover
Z479040	0.33	183' x 199'	MCAS Miramar	TSP is on bare ground. The proposed work area contains potted nursery plants that would be temporarily relocated to accommodate construction activities at this location.

¹ Numbers presented throughout this document may not add up precisely due to rounding.

2.4.1 Guard Structures

A total of 14 guard structures (GS-19 through GS-32) would be utilized to protect roadways, a railway, and distribution lines crossing underneath the existing 230-kV transmission line. No permanent impacts would result from the installation and/or utilization of guard structures. The total temporary work area needed for guard structure installation would be 0.43 acre.

Guard structures will be accomplished using one of four means:

- 1) Bucket truck staged under transmission line: a bucket truck will be staged under the transmission line to guard resources.
- 2) Two poles on either side of the transmission line, direct buried into the ground: a two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2 to 3 feet (ft.) in diameter and 6-8 ft. deep. Poles will be installed and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.
- 3) Flower pot staged under the transmission line; a flower pot consists of an approximate 5 ft. by 5 ft. by 4 ft. concrete base that holds up a temporary pole. The flower pot sits on level ground surface and no ground disturbance is needed for this type of installation.
- 4) Protective material installed on distribution lines: a bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

No foundations would be needed and no grading would occur for installation of guard structures. Guard structure details are included in Table 2.4-2 below. Guard structure installation is estimated to take three to five days to complete. All guard structure locations would be accessed via existing dirt or paved access roads.

Table 2.4-2: Guard Structures

Guard Structure	Acres ¹	Dimensions	ROW/Property Owner	Vegetation/Land Cover
GS-19	0.04	75' x 25'	MCAS Miramar	Occurs within bare ground and is surrounded by bare ground, pavement, and potted nursery plants.
GS-20	0.04	75' x 25'	MCAS Miramar	Occurs within bare ground and is surrounded by bare ground, pavement, and potted nursery plants.
GS-21	0.03	54' x 30'	MCAS Miramar	Occurs within bare ground within an existing dirt spur road. The work area is needed to place two outriggers within coastal sage scrub/chaparral mix vegetation communities. A Nuttall's scrub oak is located immediately south of the proposed outrigger area and the area is surrounded by coastal sage scrub/chaparral mix and disturbed vegetation communities.
GS-22	0.05	52' x 80'	MCAS Miramar	Located within bare ground within an existing dirt access road and is immediately surrounded by riparian woodland and coastal sage scrub/chaparral mix vegetation communities.
GS-23	0.03	50' x 25'	San Diego Metropolitan Transit Development Board	Occurs within bare ground within an existing dirt access road and includes work area on either side of the road. For potential placement of two temporary direct-bury wooden poles and four outriggers, (as required by railroad right-of-entry permit) and is surrounded by coastal sage scrub and disturbed vegetation communities.
GS-24	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and includes areas on the south side of the road for placement of two temporary direct-bury wooden poles and is surrounded by coastal sage scrub and disturbed vegetation communities.
GS-25	0.02	26' x 26'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and includes areas on either side of the road for placement of four outriggers and is surrounded by coastal sage scrub.
GS-26	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground immediately south of the sidewalk on the eastbound side of Nobel Drive and is surrounded to the north by pavement and to the south by coastal sage scrub and disturbed vegetation communities.
GS-27	0.04	75' x 30'	MCAS Miramar	Occurs within disturbed vegetation immediately north of the sidewalk on the westbound side of Nobel Drive and is surrounded to the south by pavement and to the north by coastal sage scrub and disturbed vegetation communities.
GS-28	0.002	10' x 10'	MCAS Miramar	Located within the work area associated with pole Z479049.
GS-29	0.03	50' x 25'	MCAS Miramar	Occurs within bare ground within an existing dirt access road and is surrounded by coastal sage scrub and disturbed vegetation communities. Road ruts that could support vernal pool species occur approximately 15 ft. south of the pole. These areas would be flagged for avoidance during construction.

Guard Structure	Acres ¹	Dimensions	ROW/Property Owner	Vegetation/Land Cover
GS-30	0.04	50' x 58'	MCAS Miramar	Occurs within disturbed vegetation and is surrounded by disturbed and coastal sage scrub vegetation communities to the south, and Eastgate Mall Road to the north.
GS-31	0.03	50' x 25'	Eastgate Industrial Center Owners Association, Inc.	Occurs within disturbed vegetation and is surrounded to the south by Eastgate Mall Road, and to the north by disturbed and coastal sage scrub vegetation.
GS-32	0.03	50' x 25'	Eastgate Industrial Center Owners Association, Inc.	Occurs east of a dirt access road within disturbed vegetation and is surrounded by disturbed and coastal sage scrub vegetation communities.

¹ Numbers presented throughout this document may not add up precisely due to rounding.

2.4.2 Vegetation Clearing

Minor vegetation/brush clearing and trimming are proposed as needed along access roads, existing pads, and at guard structures to minimize potential fire risk and facilitate equipment/vehicle access. Trimming of vegetation may also be necessary for placement of outriggers and/or direct buried poles. All trimmed vegetation would be removed from the site and properly disposed of. No grading is proposed.

2.4.3 Erosion and Sediment Control and Pollution Prevention during Construction

SDG&E would obtain coverage for the Proposed Project Modification under the Construction General Permit through a Change of Information (COI) to the existing Storm Water Pollution Prevention Plan (SWPPP) for the Project. SDG&E would implement best management practices (BMPs) consistent with the SWPPP, as well as the SDG&E Subregional Natural Communities Conservation Plan (NCCP), which also contains protocols for minimizing potential erosion and sedimentation.

2.4.4 Cleanup and Post-construction Restoration

SDG&E would restore all areas of sensitive vegetation that are temporarily disturbed by Proposed Project Modification activities in accordance with the Project's Habitat Restoration Plan (Chambers, June 2017). The Habitat Restoration Plan acknowledges the potential for minor changes in impact areas, and requires preparation of a Post-Construction Report to confirm actual impacts at each work area. It includes provisions for restoration of temporary impacts to the sensitive vegetation communities associated with this proposed modification, and would be implemented for areas with unavoidable impacts to sensitive vegetation. Further details regarding mitigation and temporary impacts are provided in Section 3.4, Biological Resources. No permanent impacts to sensitive vegetation communities are anticipated as a result of this Proposed Project Modification.

2.4.5 Construction Workforce, Schedule and Equipment

The estimated crew size and construction schedule are provided in Table 2.4.3. Construction is scheduled to begin upon CPUC approval which is anticipated in late 2018 and is expected to take two weeks to complete.

Table 2.4-3: Estimated Construction Equipment and Personnel

Activity	Estimated Number of On-Site Workers per Day	Estimated Days per Week of Operation	Estimated Hours per Day of Operation	Estimated Duration of Use (weeks)
Overhead Work & Guard Structure Installation	15	6	8	2

Source: SDG&E

The equipment that would be used to construct the Proposed Project Modification, is provided below in Table 2.4-4. In addition, construction equipment, pick-up trucks and construction worker vehicles are anticipated to travel on a daily basis to and from the Proposed Project Modification work areas. It is anticipated that additional maintenance and/or delivery trucks would travel to and from the staging areas between one and two times per week, or up to four times a week during peak activities.

Table 2.4-4: Anticipated Construction Equipment

Equipment Type	Approximate Number	Equipment Use
Boom trucks	TBD	Guard structure installation
Bucket trucks	2	Overhead work
Cranes	2	Overhead work
Sag Cat	1	Overhead work
Line Trucks	2	Overhead work
Flatbed Trailer	1	Overhead work
Semi-tractor	1	Overhead work
F550 framers	4	Overhead work
Pulling rig	1	Overhead work
Water Truck	1	Dust control

Source: SDG&E

2.5 OPERATION AND MAINTENANCE

The Proposed Project Modification includes work on an existing 230-kV transmission line within an existing utility corridor. SDG&E currently operates and maintains these facilities consistent with company standards. No change in SDG&E's standard operation & maintenance (O&M) procedures are anticipated or included as part of the Proposed Project Modification.

2.6 ANTICIPATED PERMITS AND APPROVALS

With the addition of approval of the Right-of-Entry Permit from the San Diego Metropolitan Transit Development Board to access GS-23, the permits and approvals would remain unchanged from what was included in the FEIR.

2.7 APPLICANT-PROPOSED MEASURES

The Proposed Project Modification would implement Project APMs and MMs outlined in Table 9.1.1 (pp. 9-11 through 9-54) of the FEIR.

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3. ENVIRONMENTAL IMPACT ASSESSMENT

This section presents an evaluation of the potential impacts associated with the Proposed Project Modification for identified environmental resource areas derived from CPUC requirements, Public Utilities Code Section 1001-1013, and CEQA requirements, Public Resources Code (PRC) Section 21080 et seq. Potential impacts are identified and evaluated based upon the significance criteria outlined in Appendix G of the *CEQA Guidelines*, and the FEIR. Unless otherwise stated, information regarding the environmental resources included in this assessment were obtained from the Project's FEIR (CPUC 2016).

The individual impact assessments for each of the resource areas are organized within this Assessment as follows:

1. Aesthetics
2. Agriculture and Forestry Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Geology, Soils, and Mineral Resources
7. Greenhouse Gas Emissions
8. Hazards and Hazardous Materials
9. Hydrology and Water Resources
10. Land Use and Planning
11. Noise
12. Paleontological Resources
13. Population and Housing
14. Recreation
15. Transportation and Traffic
16. Utilities and Public Service Systems

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3.1 AESTHETICS

3.1.1 Existing Conditions

The existing conditions of aesthetics applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below.

3.1.1.1 Regional and Local Landscape Setting

The Proposed Project Modification is located south of cable pole CC MM CP and Carroll Canyon Road, east of I-805, and north of State Route (SR-) 52. A large portion of the modification is within MCAS Miramar. Land uses in the vicinity of the Proposed Project Modification include MCAS Miramar, I-805, and industrial areas. Landforms in the area generally consist of rolling hills and mesas, or flat-topped outcroppings dissected by canyons. Hillsides and peaks are prominent landscape features of the distant views. Dominant landmarks in the Proposed Project Modification vicinity are Rose Canyon and tributary canyons.

Information regarding scenic vistas, scenic highways, landscape character, view exposure, and viewpoints would remain unchanged from what was included in Section 4.2.13.1 (pp. 4.2-106 and 4.2-107) of the FEIR.

3.1.1.2 Proposed Project Viewshed

The Proposed Project Modification would be visible from some nearby locations along public roads; however, the entire Proposed Project Modification would include overhead work on an existing 230-kV transmission line that is already an established feature within the landscape setting. At many locations, intervening natural landforms would partially or fully screen public views of the Proposed Project Modification. The entirety of the Proposed Project Modification is surrounded by areas of open space (MCAS Miramar), and visibility would be limited where it blends in with surrounding or backdrop vegetation and landforms in many areas. The majority of the Proposed Project Modification is bounded by MCAS Miramar, which is not open to the public. Given these conditions, as well as the length (approximately 2 miles) of the overall Proposed Project Modification alignment, the Proposed Project Modification would not be visible in its entirety from any single viewing location.

3.1.2 Potential Impacts

3.1.2.1 Significance Criteria

- a) **Would the project have a substantial adverse effect on a scenic vista?**
- b) **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

No Impacts to scenic vistas, scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway would occur as a result of the Proposed Project Modification

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant

Construction of the Proposed Project Modification would not result in the temporary alteration of landforms. The Proposed Project Modification would include vegetation trimming around existing access roads and pads for the installation of temporary guard structures and to provide access to existing poles. Construction impacts on visual resources may result from the presence of construction vehicles, equipment, materials, and work forces within the Proposed Project Modification area. Vehicles, heavy equipment and workers would be visible during access and spur road clearing structure erection, conductor stringing, and site/ROW cleanup and restoration. Construction equipment and activities would be seen by various viewers in proximity to the ROW including travelers on I-805. The primary viewing opportunities of concern are where open traffic control, construction vehicles, and equipment would be visible where stringing occurs across public access roadways and the railroad. The Proposed Project Modification would occur within an area actively used by SDG&E and other utility O&M crews that periodically use similar equipment on the overhead line for maintenance purposes; therefore, vehicles and construction equipment would be similar to existing conditions.

Construction activities would be transient and of short duration (2 weeks) as construction progresses along the route. Additionally, impacts to visual quality would be low due to the low existing visual quality of the area. Affected viewers would be aware of the temporary nature of project construction impacts, which would decrease their sensitivity to the impact. The resulting visual impacts would be less than significant.

d) Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

No Impact

No impacts related to light and glare would occur from the Proposed Project Modification.

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Existing Conditions

3.2.1.1 Agricultural and Forestry Setting

The Proposed Project Modification is not located on in an area of existing agricultural operations. The southernmost portion of the Proposed Project Modification is located within an existing commercial nursery on MCAS Miramar property. The temporary work areas and associated access roads in this proposed modification are located in disturbed/developed areas currently used by SDG&E's Transmission Construction and Maintenance crews for O&M activities.

FMMP Mapped Farmland

A review of the FMMP indicates that the Proposed Project Modification would traverse areas designated as Grazing Land and Unique Farmland. In addition, it would occur adjacent to Farmland of Local Importance.

Active Agricultural Operations, Zoning, and Forest Land

There are no active agricultural operations, no areas zoned for agricultural use, and no forest land or areas zoned for forest land within or adjacent to the Proposed Project Modification area.

3.2.2 Potential Impacts

3.2.2.1 Significance Criteria

- a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact

No conversion of farmland would result from this Proposed Project Modification, as it involves only re-tensioning of an existing 230-kV transmission line. Access and all work on the existing line are covered under SDG&E's easement rights. The commercial nursery is located on FMMP Mapped Unique Farmland; however, it is not currently utilized as farmland for agricultural purposes. Access through the commercial nursery would not impact nursery operations or result in the conversion of farmland to a non-agricultural use. No additional property owner approvals are required. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on agricultural resources.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

No Williamson Act lands or other agricultural preserves would be impacted by the Proposed Project Modification.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

There is no land zoned as forest land, timberland, or a Timber Production Zone within the Proposed Project Modification area. In addition, the Proposed Project Modification would not directly or indirectly cause any changes in the existing environment that would result in the conversion of Farmland to nonagricultural use or forest land to non-forest use.

f) Would the project interfere with active agricultural operations, or convert land used for active agricultural operations to an incompatible use?

No Impact

SDG&E would coordinate with the commercial nursery on the southernmost end of the proposed project to establish temporary work areas. The Proposed Project Modification would not interfere with agricultural operations or result in an incompatible use.

3.3 AIR QUALITY

3.3.1 Existing Conditions

The existing conditions of air quality applicable to the Proposed Project Modification remain the same as previously described in the FEIR. Due to the limited nature and duration of work activities, and similarity to other project related activities, updates to air quality estimates were not conducted for this Project Modification.

3.3.1.1 Significance Criteria

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Significant and Unavoidable

Similar to the analysis presented in Section 4.13.7 of the FEIR, the Proposed Project Modification would not directly or indirectly induce population growth. The type of equipment and duration of construction activities associated with this proposed modification are consistent with those discussed in the FEIR. Consistent with the FEIR, SDG&E would implement MM Air-1 which requires adherence to Regional Air Quality Strategy (RAQS) architectural coating standards and would avoid conflicts with the RAQS.

Similar to that described in the FEIR Section 4.13.7 p. 21, implementation of APM AIR-2 (vehicle and equipment exhaust controls) would avoid conflict with the reasonably Available Control Measures (RACM) of the Eight-Hour Ozone Attainment Plan.

The construction of the Proposed Project Modification would rely on equipment similar to that included in the air quality calculations for the proposed project and is not expected to substantially increase the NO_x due to the limited duration and scale. MM Air-4, which requires the use of construction equipment that meets a minimum of Tier 3 emissions standards, would reduce NO_x emissions. However, consistent with the FEIR, construction impacts would remain significant because NO_x emissions would remain above the threshold.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Significant and Unavoidable

Due to the limited duration and scale of the work activities, the Proposed Project Modification is not expected to substantially increase the PM₁₀ and NO_x emissions thresholds as shown in Table 4.13-21 (p. 4.13-63) of the FEIR. Implementation of APM AIR-1 (fugitive dust control) would reduce PM₁₀ emissions to below the emissions threshold, and impacts from PM₁₀ emissions would be less than significant.

Implementation of MM Air-3, which requires implementation of a Dust Control Management Plan, would reduce impacts associated with visible dust, as required by San Diego Air Pollution Control District (SDAPCD) Rule 55.

As noted above, NO_x emissions for the Project (Alternative 5) exceed the emissions threshold. The Proposed Project Modification would not result in any new impacts or a substantial increase in the severity of a previously analyzed impact on air quality as identified in the FEIR. However, consistent with the FEIR, impacts would remain significant and unavoidable.

- c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?**

Significant and Unavoidable

The Proposed Project Modification would not substantially increase the PM₁₀ estimates, as noted in the FEIR. Implementation of APM AIR-1 (fugitive dust control) would reduce PM₁₀ emissions. In addition, the Proposed Project Modification would not substantially increase the construction emissions of NO_x, an O₃ precursor. However as described in FEIR Section 4.13.7 pg. 26, impacts would remain significant because NO_x emissions for the Project (Alternative 5) would still exceed thresholds and contribute to a cumulatively considerable increase in O₃. Impacts would remain significant and unavoidable.

- d) Would the project expose sensitive receptors to substantial pollutant concentrations?**

Less than Significant

Construction of the Proposed Project Modification would involve the use of diesel-powered vehicles and equipment, which produce carcinogenic toxic air contaminants (TACs) and particulate matter. The vehicles and equipment used for construction would not be concentrated in any one area of the Proposed Project Modification alignment because work would be dispersed throughout the transmission corridor. Consistent with the FEIR Section 4.13.7 pg. 27, impacts would be less than significant. No mitigation is required.

- e) Would the project create objectionable odors affecting a substantial number of people?**

Less than Significant

Diesel exhaust emissions from construction vehicles and equipment would create objectionable odors. The closest residential area is located approximately 450 ft. west of the transmission line within the southern portion of the alignment north of Governor Drive, and is separated from the Project by I-805. The use of construction equipment and vehicles 450 ft. from a residence would result in minimally perceptible, if not imperceptible, odors. Additionally, receptors would only temporarily be able to perceive odors because construction at any one location would not last more than a few days. Impacts would be less than significant. No mitigation is required.

3.4 BIOLOGICAL RESOURCES

3.4.1 Existing Conditions

In order to prepare the existing conditions section below, information was gathered from the following sources. The existing conditions of the biological resources applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized in Sections 3.4.1.1 through 3.4.1.6 below.

Literature Review

A search of the California Natural Diversity Database (CNDDDB) was conducted to identify all special-status plant and wildlife species that have been documented within one mile of the Proposed Project Modification area. Each of these species was evaluated for potential to occur within the Proposed Project Modification area, with the results provided below in Section 3.4.1.5 and 3.4.1.6.

Existing natural resources data from MCAS Miramar (2012) and SDG&E records from other projects in the vicinity were also reviewed prior to the field survey.

Field Surveys

Surveys and assessments to inventory and evaluate biological resources were conducted within the Project Survey Area (PSA) during 2017. The PSA is composed of an approximately 2.5-mile-long portion of an existing transmission corridor (that contains an existing wood and steel pole alignment) and a 100-ft. buffer surrounding the work areas and access routes associated with the Proposed Project Modification. Sixteen poles (Z479040 through Z479055) and 14 guard structures (GS 19 through GS 32) are included in the Proposed Project Modification and PSA.

Special-Status Plant and Wildlife Surveys

Special-status plants and wildlife were surveyed for during all biological surveys within the PSA. Table 3.4-1 summarizes biological survey dates and personnel.

Table 3.4-1: Biological Surveys

Survey Date	Biologists	Survey Summary
August 15, 2017	Jenna Hartsook & Emma Fraser	Reconnaissance survey of Proposed Project Modification alignment and poles
August 25, 2017	Jenna Hartsook & Michelle Fehrensén	Survey with construction personnel to identify guard structure locations, refine work areas around poles, and confirm access routes
September 09, 2017	Jenna Hartsook & Alonso Cabello	Survey of sites proposed for post-construction restoration
September 20, 2017	Jenna Hartsook & Jonathan Dunn	Vegetation mapping survey of PSA
October 27, 2017	Jenna Hartsook & Scott McMillan	Survey to confirm vernal pool presence/absence and locations

Target plant and wildlife species included those documented by the CNDDDB within one mile of the Proposed Project Modification area; however, biologists also passively surveyed for special-status species that have not been documented in the area by the CNDDDB.

The biological surveys occurred between August and October 2017, which is not an optimal time period for recognizing presence of annual flowering plant species. Therefore, habitat evaluations were conducted to determine potential for occurrence for these species (Table 3.4-2).

Wetland and Delineation of Jurisdictional Waters

During the field surveys, biologists noted potential jurisdictional features and potential impacts. One jurisdictional feature, Rose Creek, was documented within the PSA. On September 12, 2017, wetland specialist Sundeep Amin mapped the jurisdictional limits of Rose Creek in the vicinity of the PSA.

All work areas are located outside of jurisdictional features.

Other riparian areas exist along the PSA, as described in detail below in Section 3.4.1.1 (Vegetation Communities). These areas were not formally delineated since contractors would remain on existing access roads, and no impacts to these resources are anticipated.

3.4.1.1 Vegetation Communities

Proposed Project Modification work areas consist mostly of non-sensitive vegetation communities, including bare ground and disturbed vegetation. Coastal sage scrub and coastal sage scrub/chaparral mix vegetation also occur within the work area footprints.

Additional vegetation communities including grassland, chaparral, southern maritime chaparral, coast live oak forest, coast live oak riparian forest, riparian scrub, riparian woodland, non-vegetated flood channel, and landscape/ornamental occur within the 100-ft. buffer. However, no impacts to these vegetation communities are anticipated as a result of the Proposed Project Modification. The distribution of these vegetation communities surrounding the work areas is presented in Figure 3.4-1. Vegetation community polygons within the PSA were mapped in the field on September 20, 2017. Vegetation community polygons within the PSA were mapped to an approximate half-acre scale. Temporary work space areas were mapped at a finer scale than the surrounding area within the 100-ft. buffer to reflect proposed impacts to vegetation.

3.4.1.2 Critical Habitat

The portion of the Proposed Project Modification located outside of MCAS Miramar property does not occur within U.S. Fish and Wildlife Service (USFWS) critical habitat. Critical habitat is not designated on military lands. The closest designated critical habitat to the project is located approximately 0.20 mile west of and across I-805 from poles Z479045, Z479046, and Z479047. This critical habitat area is designated for spreading navarretia (*Navarretia fossalis*); this species is evaluated below in Table 3.4-2. No other designated critical habitat is located within two miles of the Proposed Project Modification area.



Legend

- (Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer
- Vegetation Communities**
- Bare Ground
 - Coastal Sage Scrub
 - Disturbed
 - Grassland

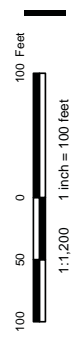
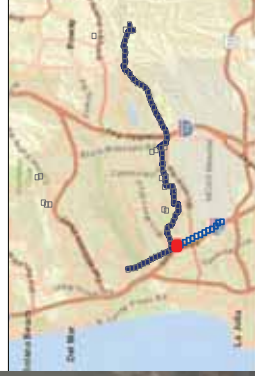
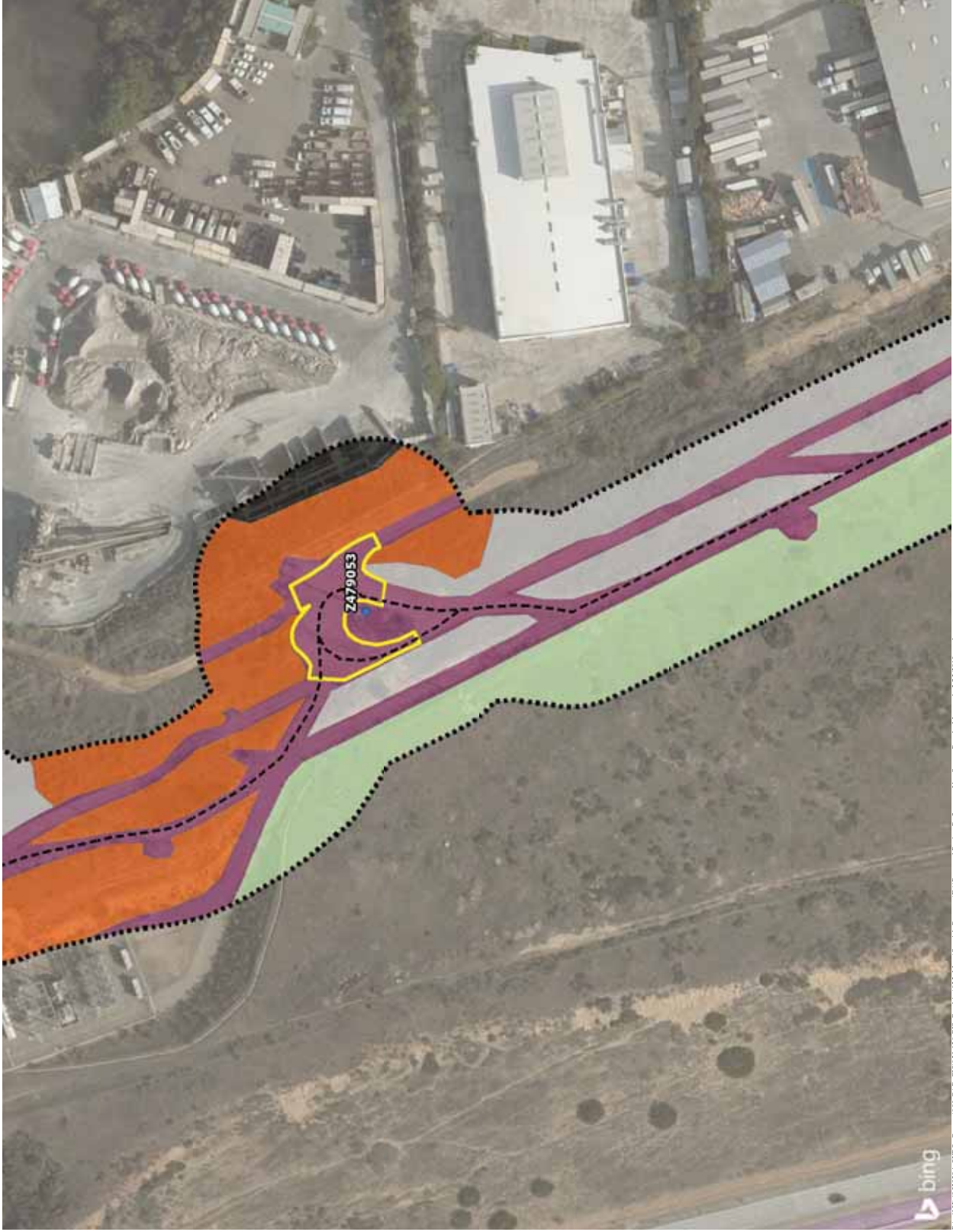


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 1

2/22/2018

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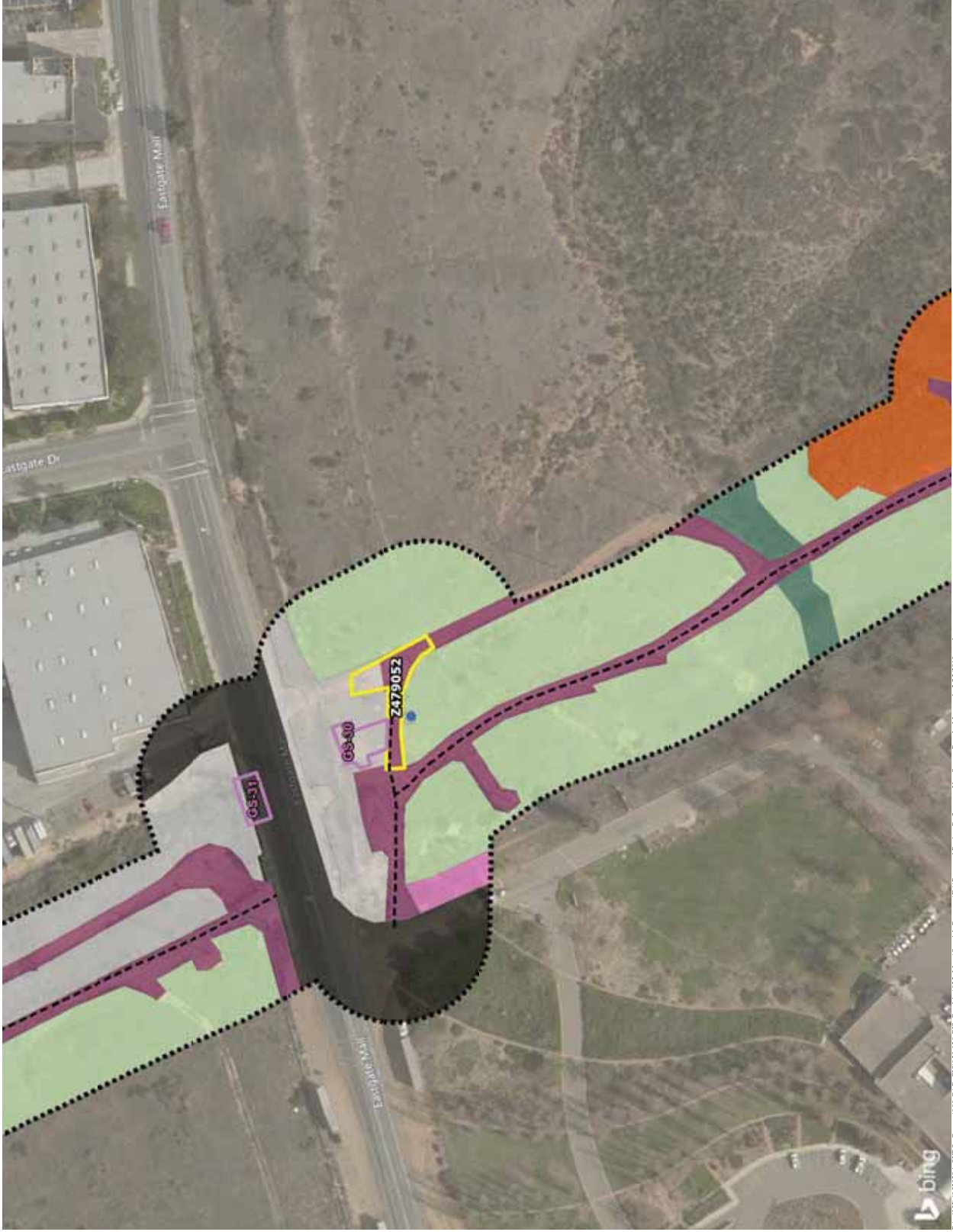


- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer
- Vegetation Communities**
- Bare Ground
 - Coastal Sage Scrub
 - Disturbed
 - Grassland
 - Pavement - Asphalt or Concrete



Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 2

2/22/2018



Legend

- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer
- Vegetation Communities**
- Bare Ground
 - Coastal Sage Scrub
 - Disturbed
 - Grassland
 - Ornamental Landscaping
 - Pavement - Asphalt or Concrete
 - Riparian Scrub

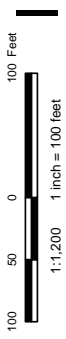
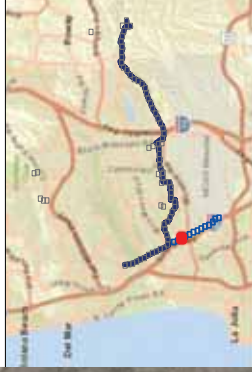
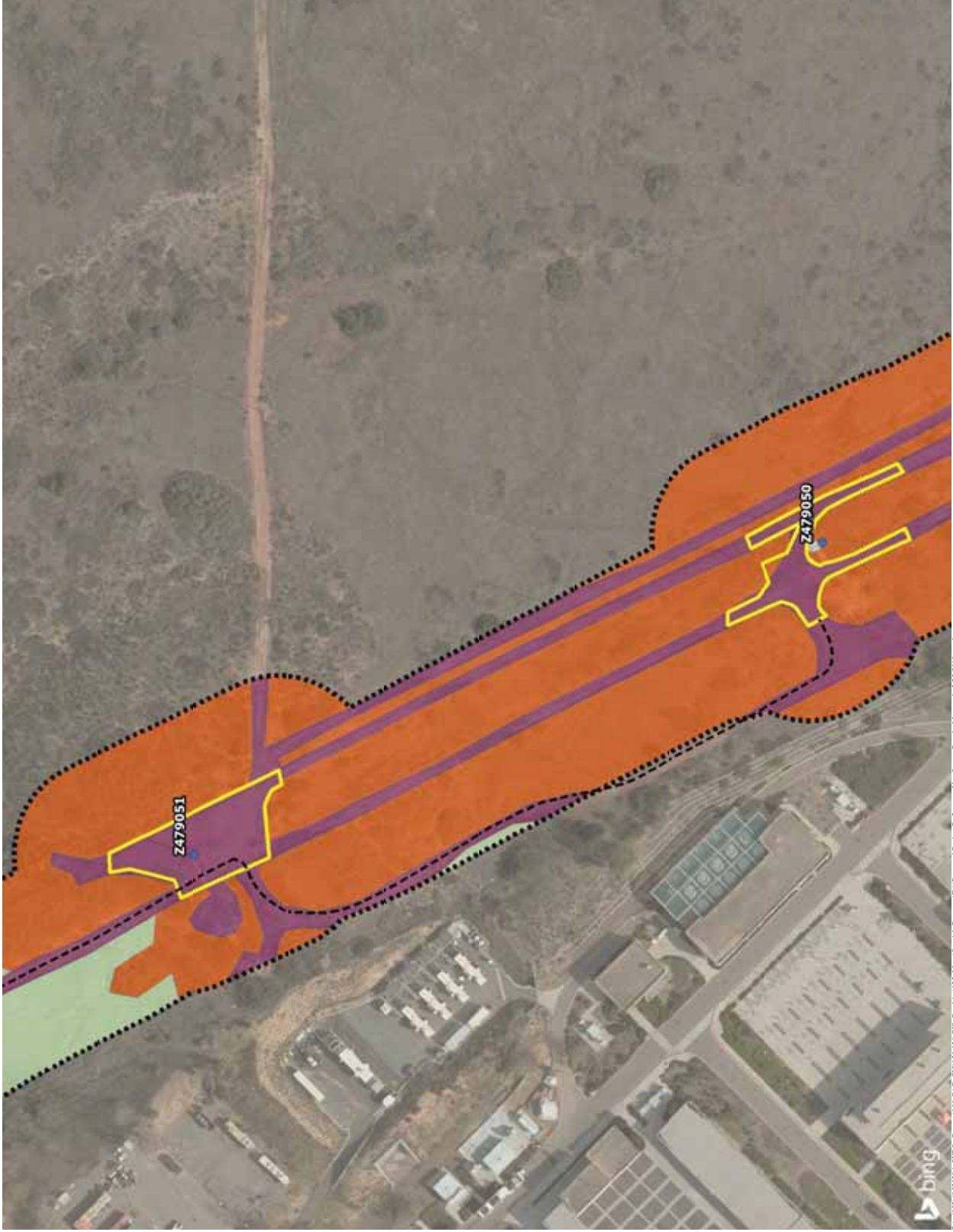


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 3
 2/22/2018

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Legend

- (Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland

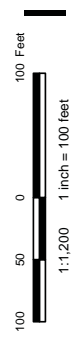
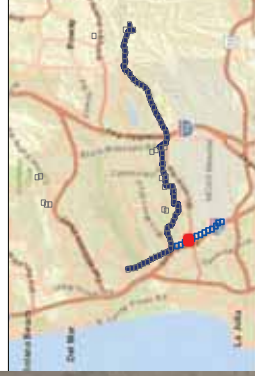
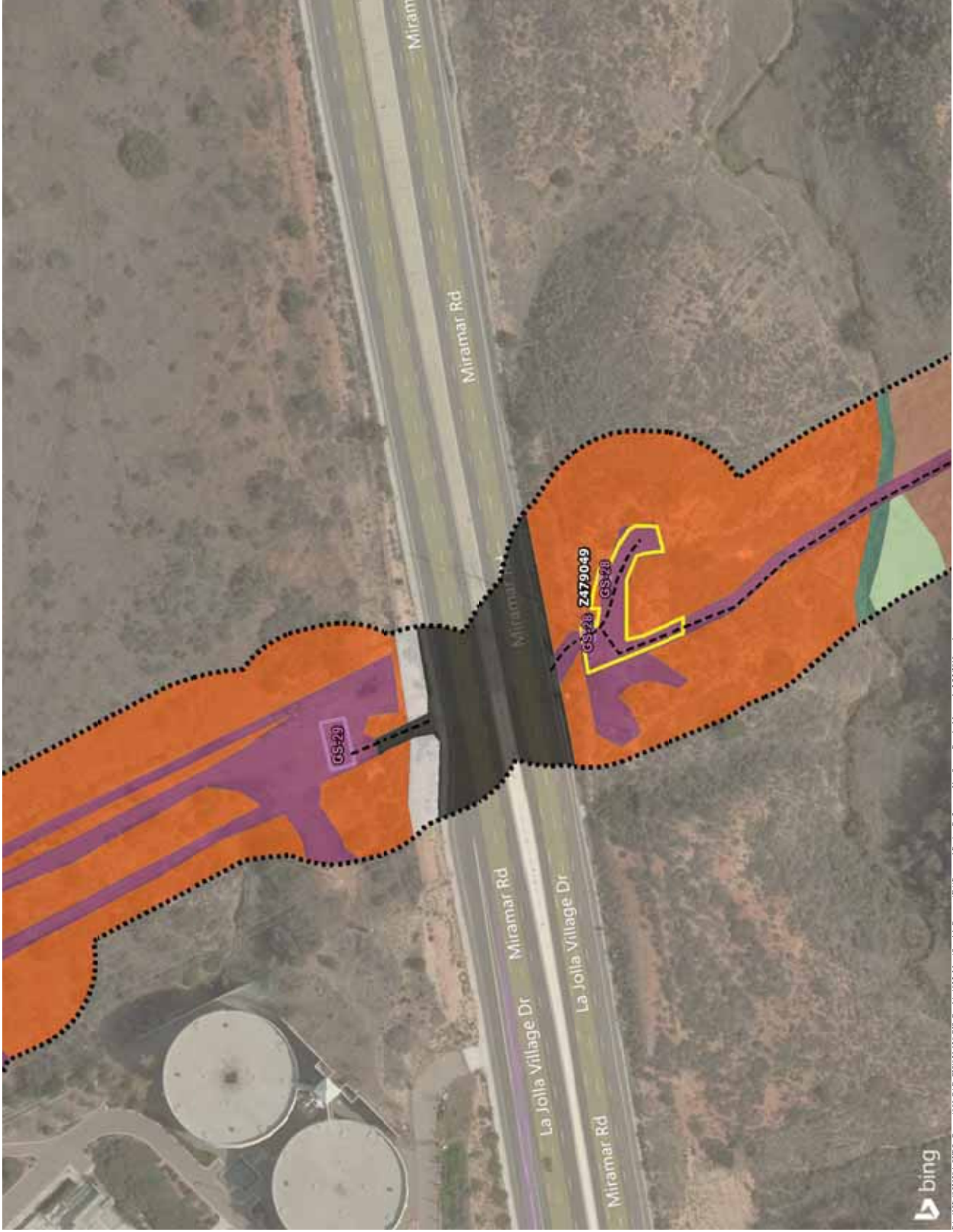


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 4

2/22/2018

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Legend

- (Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer
- Vegetation Communities**
- Bare Ground
 - Coastal Sage Scrub
 - Coastal Sage/Chaparral Mix
 - Disturbed
 - Grassland
 - Pavement - Asphalt or Concrete
 - Riparian Scrub

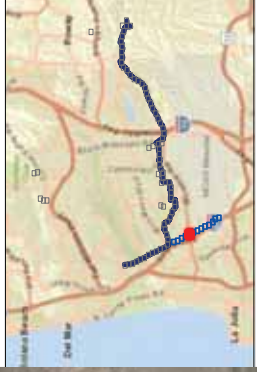
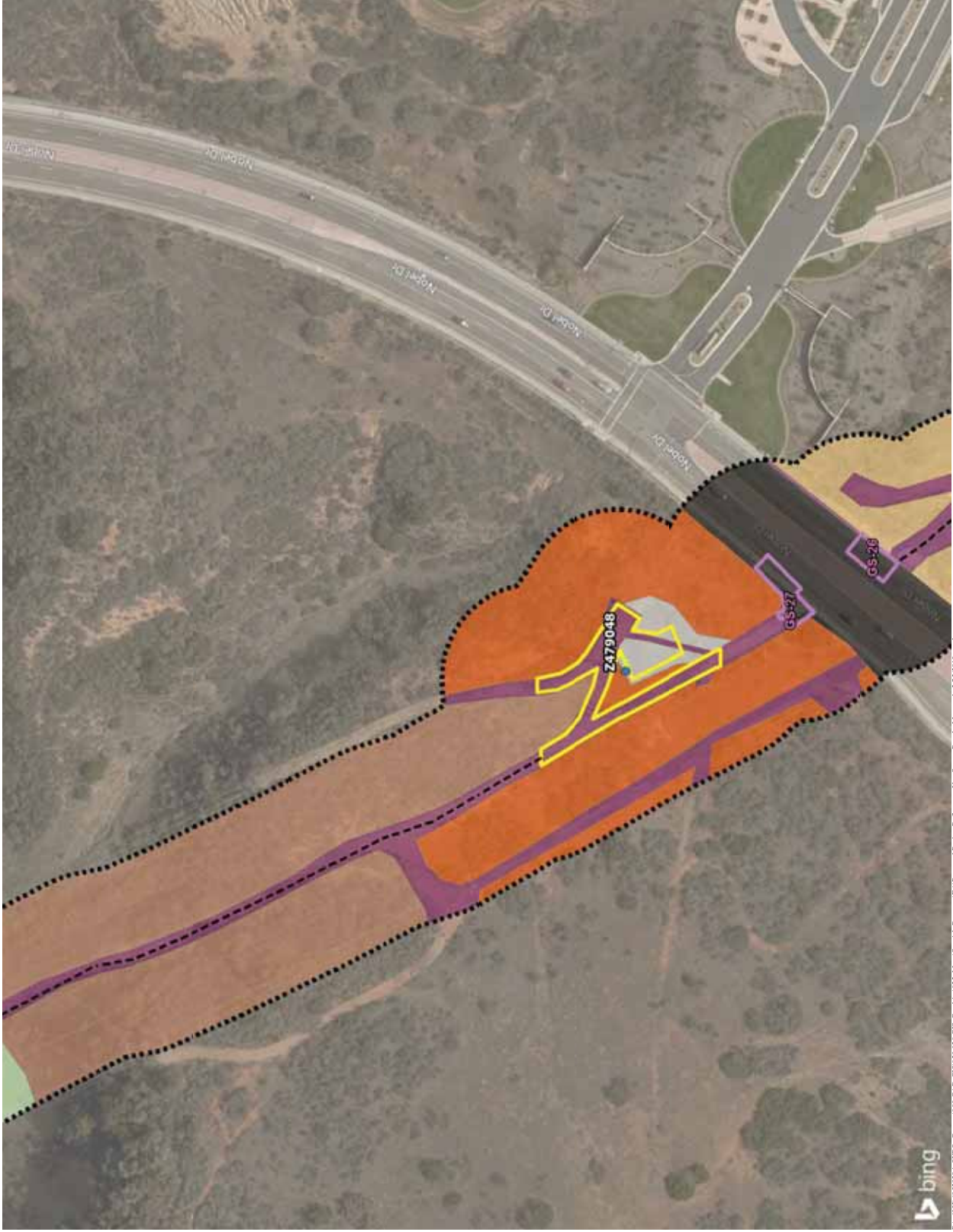


Figure 3.4-1
Sycamore to Peñasquitos
Proposed Project Refinement
Vegetation Map 5
2/22/2018

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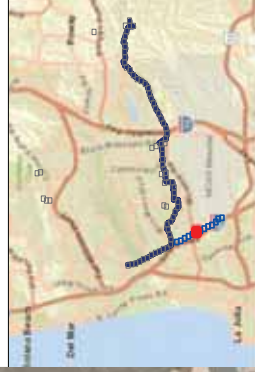


Legend

- (Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Vegetation Communities

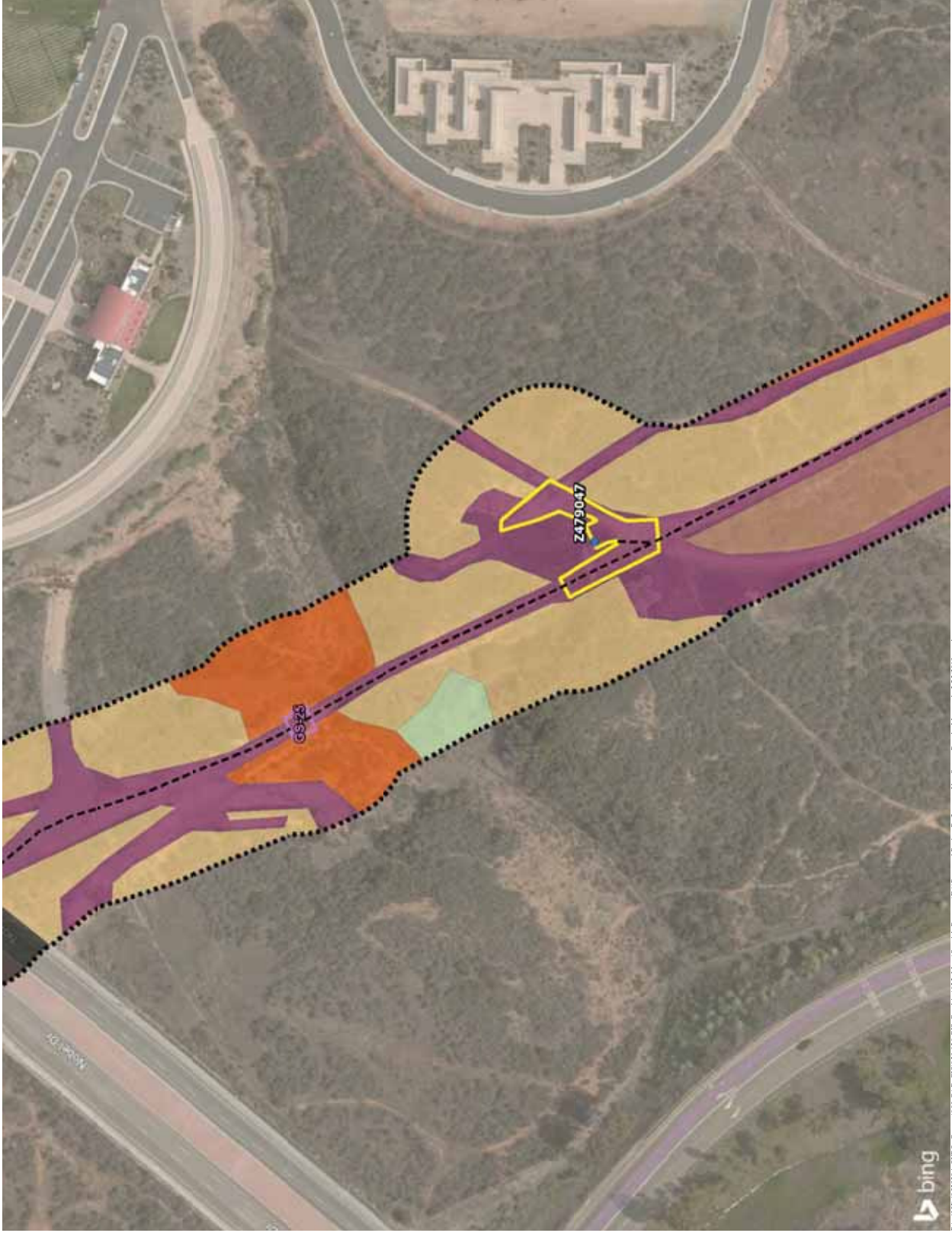
- Bare Ground
- Chaparral
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Disturbed
- Grassland
- Pavement - Asphalt or Concrete



100 50 0 100 Feet
 1:1,200 1 inch = 100 feet

Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 6
 2/22/2018





Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Chaparral
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Grassland
- Pavement - Asphalt or Concrete

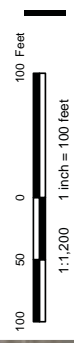
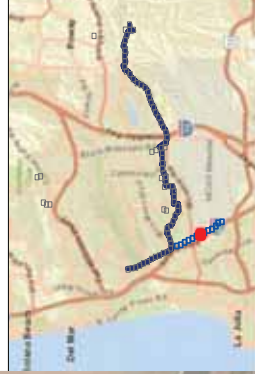
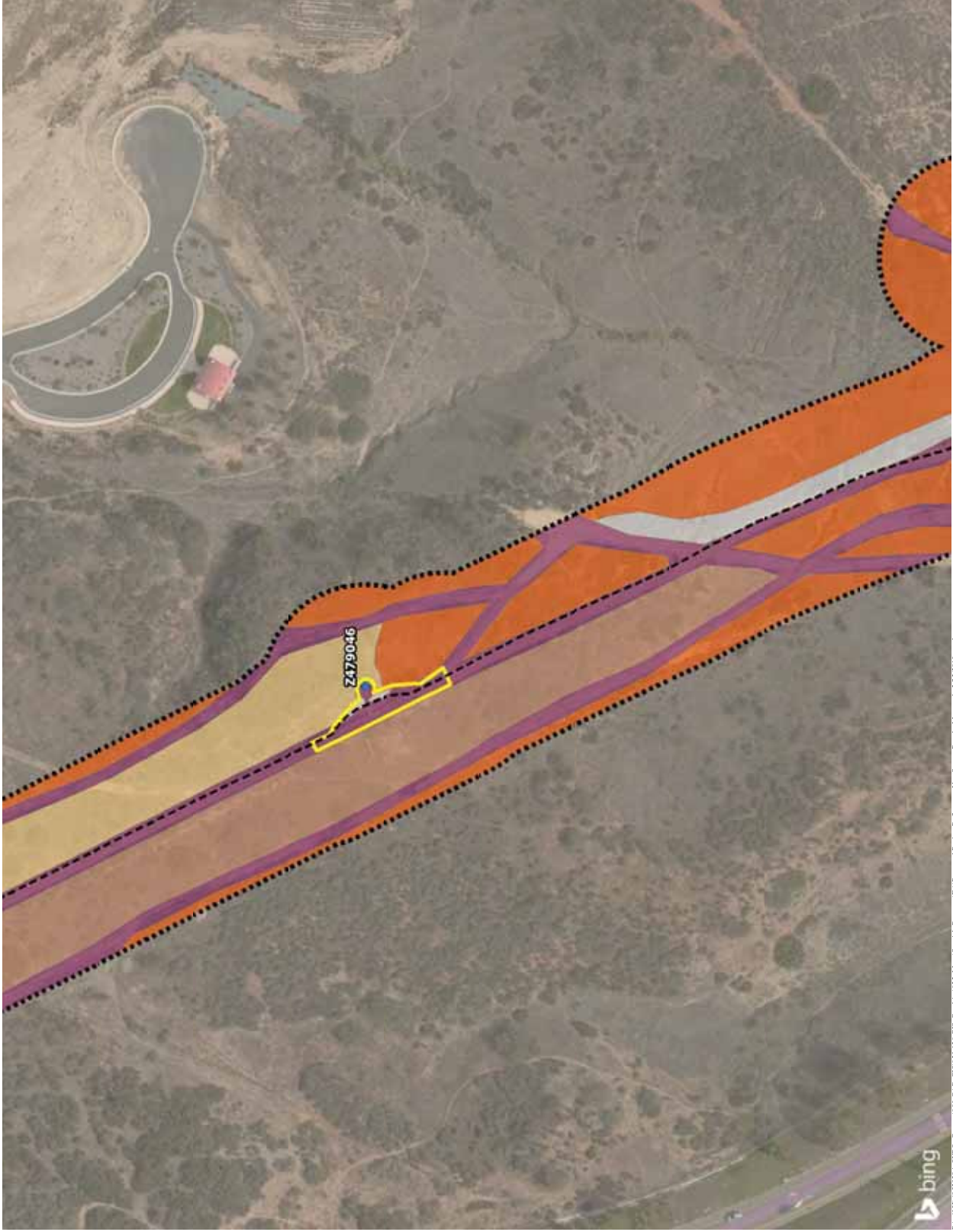


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 7

2/22/2018





Legend

- (Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Chaparral
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Disturbed

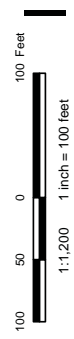
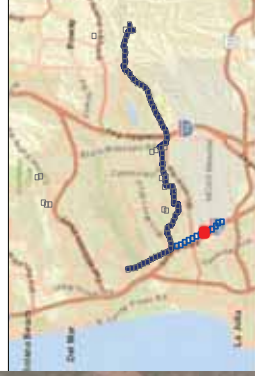
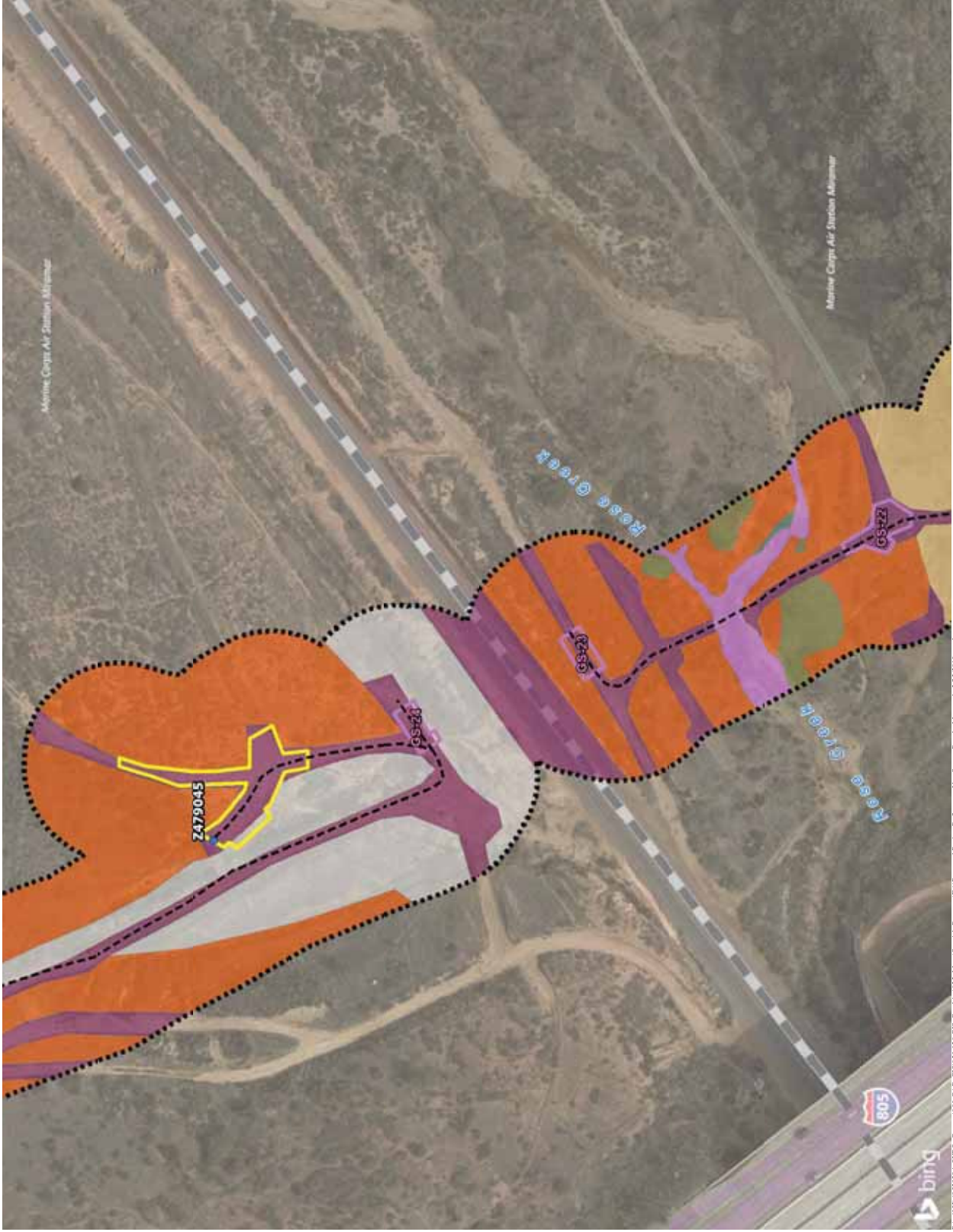


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 8
2/22/2018



Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Chaparral
- Coastal Sage Scrub
- Disturbed
- Non-Vegetated Floodchannel
- Riparian Scrub
- Riparian Woodland

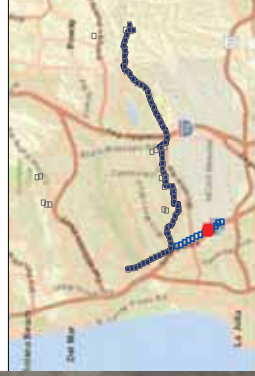
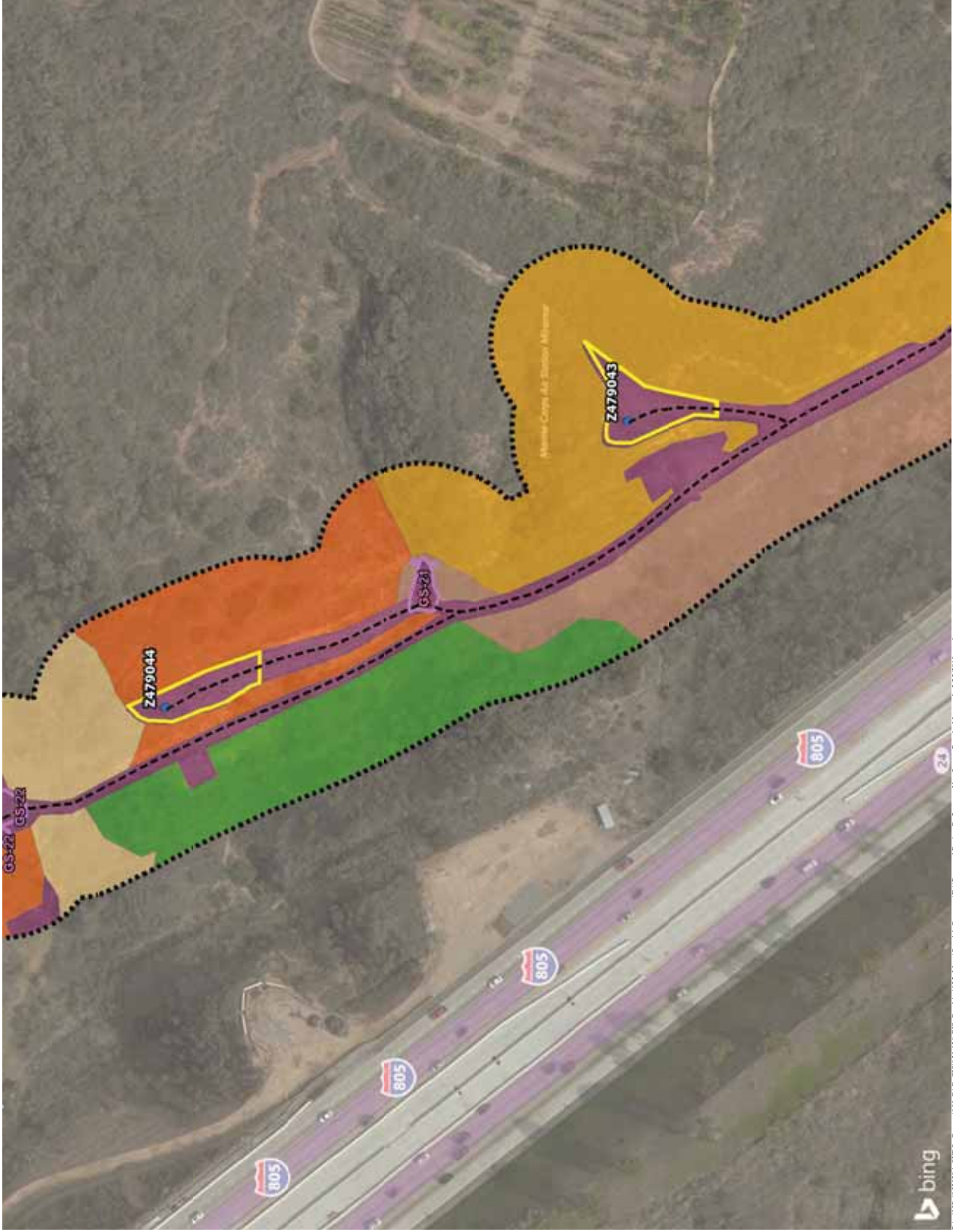


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 9

2/22/2018

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Legend

- (Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Chaparral
- Coast Live Oak Forest
- Coast Live Oak Riparian Forest
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Southern Maritime Chaparral

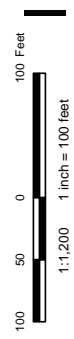
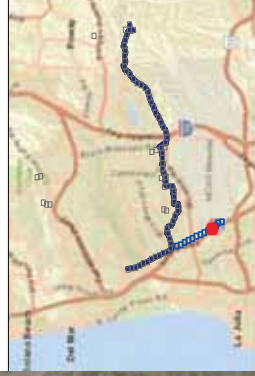
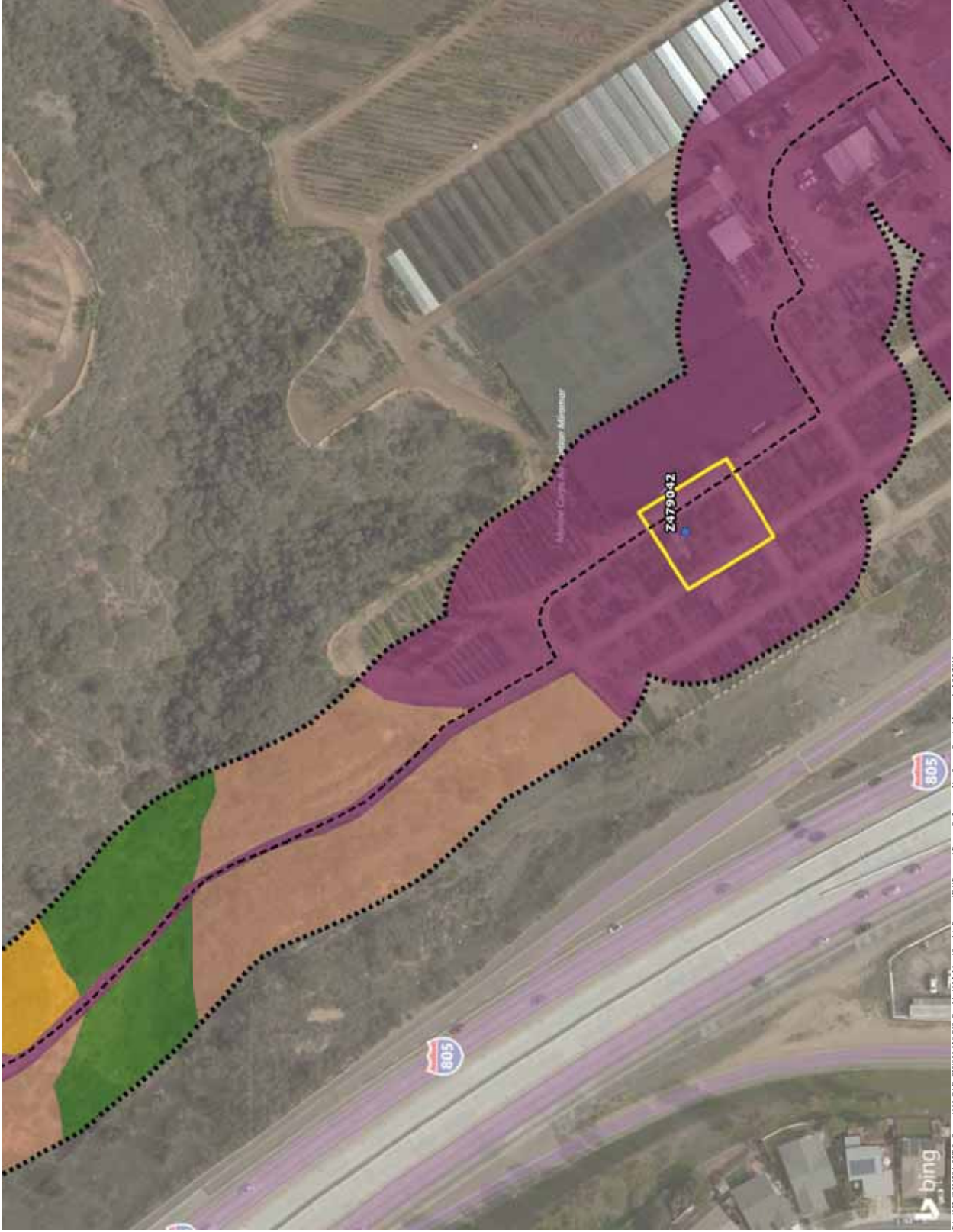


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 10

2/22/2018



Legend

- (Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Coast Live Oak Riparian Forest
- Coastal Sage/Chaparral Mix
- Southern Maritime Chaparral

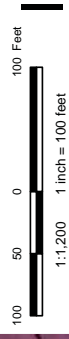
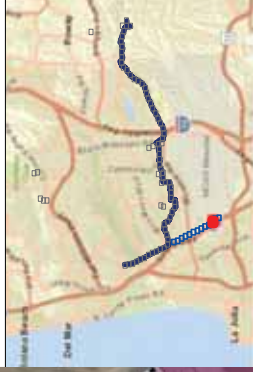
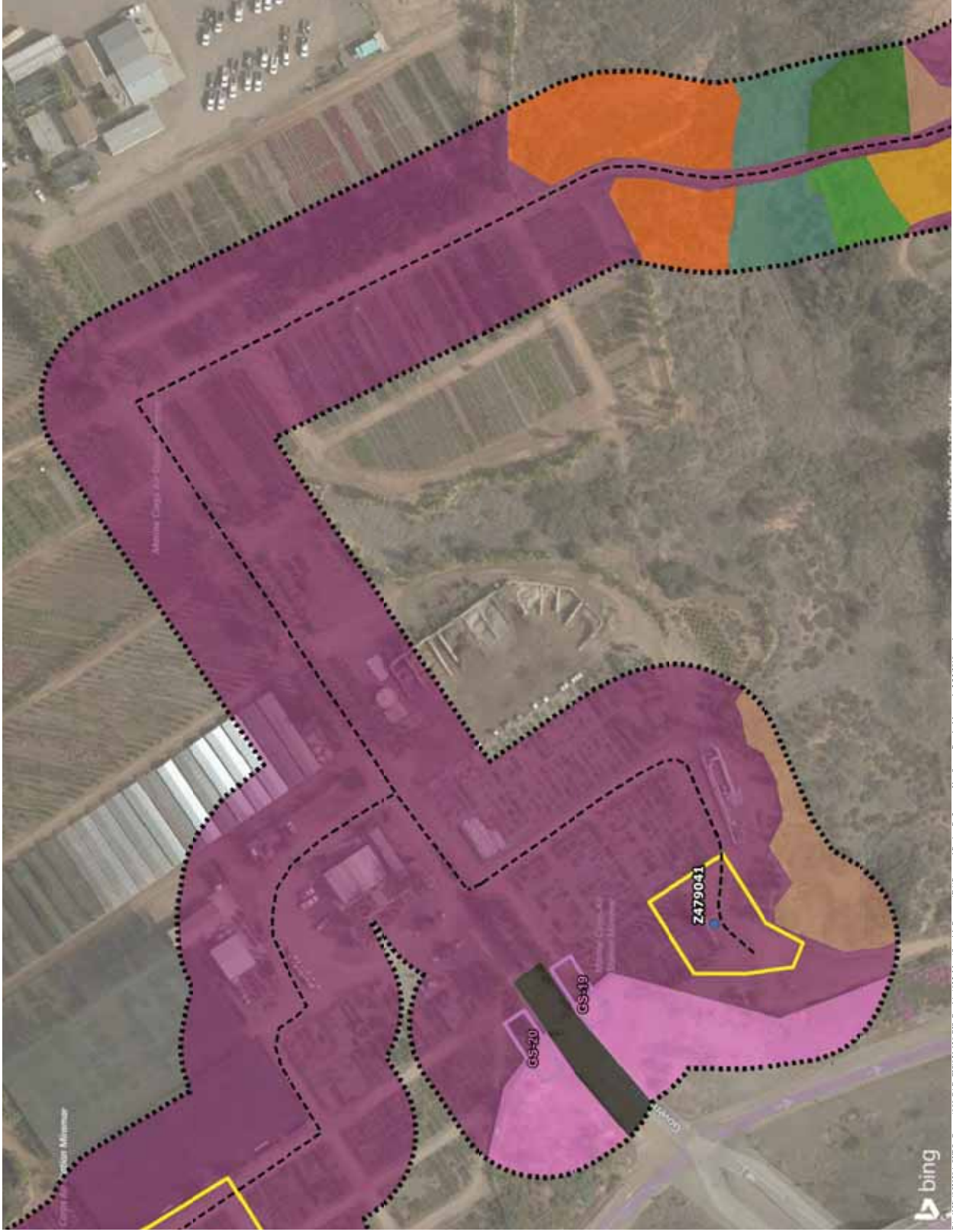


Figure 3.4-1
Sycamore to Peñasquitos
Proposed Project Refinement
Vegetation Map 11

2/22/2018

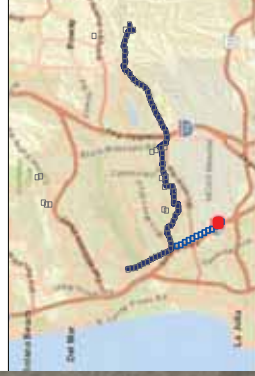


Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Coast Live Oak Forest
- Coast Live Oak Riparian Forest
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Ornamental Landscaping
- Pavement - Asphalt or Concrete
- Riparian Scrub
- Southern Maritime Chaparral



100 50 0 100 Feet
 1:1,200 1 inch = 100 feet

Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 12

2/22/2018





Legend

- () Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

Vegetation Communities

- Bare Ground
- Coast Live Oak Forest
- Coast Live Oak Riparian Forest
- Coastal Sage/Chaparral Mix
- Southern Maritime Chaparral

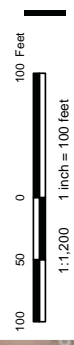
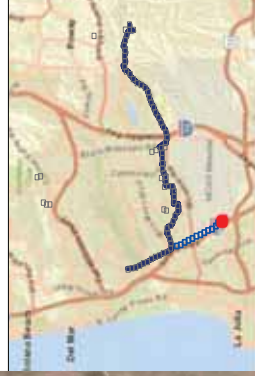


Figure 3.4-1
Sycamore to Penasquitos
Proposed Project Refinement
Vegetation Map 13
 2/22/2018

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3.4.1.3 Wildlife Corridors

In general, wildlife species are likely to use habitat within Rose Canyon and MCAS Miramar for local movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover). Regionally, the Proposed Project Modification area does not represent a regional migration corridor for terrestrial wildlife. The area is designated as a “core biological area” (Kearny Mesa core biological area) in the San Diego County Multiple Species Conservation Program (MSCP) Subregional Plan (County of San Diego 1998). Rose Canyon connects with San Clemente Canyon near the I-5 and both canyons are connected with large areas of open space on Miramar Naval Air Station. Development west of I-805 on the north and south sides of the canyon restricts terrestrial wildlife movement in those directions. In addition, I-5 limits terrestrial wildlife movement to the west.

The Proposed Project Modification area is part of the Pacific Flyway, a major north-south migration route for birds that travel between North and South America. Rose Canyon and open space within MCAS Miramar likely serve as a migrant stopover location, providing food and water to avian species. Many avian species may pass through the Proposed Project Modification Area during migration and/or may use this area as migratory stopover habitat.

3.4.1.4 Vernal Pools

Vernal pools have been surveyed over multiple years throughout Miramar and within the SDG&E ROW of the Proposed Project Modification. Field surveys were conducted on September 19, 2017, to confirm vernal pool locations within and adjacent to proposed work areas and access roads. An additional survey was conducted on October 27, 2017, to confirm the presence and verify or update the extents of vernal pools and associated watersheds. Figure 3.4-2 reflects vernal pool conditions as of October 27, 2017.

Vernal pools are characterized by evidence of ponding water and presence of vernal pool indicator plants/animals and are mapped at the maximum area of vernal pool inundation, extending to, and including, the uppermost margins of the pool area that holds water when a pool is full. To further define vernal pool conditions, vernal pools were classified into one of the following four categories:

- 1) *Vernal Pools – Present*: Vernal pools located off of access roads that were identifiable during the survey.
- 2) *Historic Vernal Pools – Not Present*: Vernal pools previously mapped off of access roads that were not identifiable during the survey.
- 3) *Disturbed Road Pools – Present*: This distinction is intended to clarify vernal pools that are located within existing access roads/maintained areas that are routinely accessed by SDG&E or MCAS Miramar Base Patrols that were identifiable during the survey.
- 4) *Historic Road Pools – Not Present*: Pools mapped within access roads that were not identifiable during the survey.

A total of 19 vernal pools were confirmed and mapped within the PSA.

3.4.1.5 Special-Status Plants

Table 3.4-2 includes special-status plant species documented by the CNDDDB within one mile of the Proposed Project Modification and/or were observed during field surveys. Surveys of the Proposed Project Modification area included searching for these species as well as other sensitive species. Phenology, plant life cycles, and reference populations were taken into account when determining potential for occurrence.

Table 3.4-2: Special-Status Plant Species

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
California adolphia (<i>Adolphia californica</i>)	CRPR 2B.1	Dry slopes, chaparral, coastal sage scrub, grassland	This species is not expected to occur in the work areas, as it was not observed during the survey and would have been observed if present. As a result, no impacts to this species are anticipated.
San Diego sagewort (<i>Artemisia palmeri</i>)	CRPR 4.2	Drainages in chaparral, coastal sage scrub, riparian, mesic and sandy soils	Observed immediately west of the access road between poles P479043 and P479044, and one individual was observed on the east perimeter of GS-22. Additionally, the species was observed adjacent to Rose Creek but outside of any of the work areas. The areas where this species is present would not be accessed for work activities and species would be flagged for avoidance. As a result, no impacts to this species are anticipated.
Coastal dunes milk-vech (<i>Astragalus tener</i> var. <i>titi</i>)	NCCP NE FE, CE CRPR 1B.1	Coastal dunes, bluffs, coastal terrace grassland	Currently, only one known population of this species exists in Monterey County, California, and no observations of this species have been made in San Diego County since 1975. While potentially suitable habitat for this species occurs in the area surrounding the work sites, the work areas do not contain habitat suitable for this species, and this species is considered extirpated from San Diego County. As a result, this species is not expected to occur at the work sites or in the immediate surrounding areas, and no impacts to this species are anticipated.
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	NCCP CRPR 1B.1	Chaparral, coastal sage scrub, valley and foothill grasslands (specifically near vernal pools)	Potentially suitable coastal sage scrub habitat occurs within portions of the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. The surrounding coastal sage scrub, coastal sage scrub/chaparral mix, and grassland habitats of the work sites provide moderately suitable habitat for this species. This species was not detected during the field survey. Due to the blooming period for this species and the fact that it is a bulb, it would not have been detectable at the time of the survey, if present. Impacts to this species would be avoided by avoiding ground disturbance within habitat suitable for this species if work occurs outside of the blooming season, conducting a pre-construction survey to verify there are no plants present if work occurs during the blooming season, or using flower

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
			pots to avoid ground disturbance if work occurs outside of the blooming season.
Orcutt's brodiaea (<i>Brodiaea orcuttii</i>)	CRPR 1B.1	Meadows, vernal pools, wetlands	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for the Proposed Project Modification. This species was not detected during the field survey, and no impacts are anticipated.
Orcutt's spineflower (<i>Chorizanthe orcuttiana</i>)	NCCP NE FE, CE CRPR 1B.1	Weathered sandstone bluffs or loose sandy soils associated with coastal or southern maritime chaparral	The sandy/cobbly soils and coastal sage scrub/chaparral mix habitat that exist adjacent to GS-22 are considered potentially suitable for this species. However, the closest documented occurrence (in Kearny Mesa) to the work areas is based on a collection that gave a general location and is considered extirpated. Therefore, the potential for this species to occur is considered very low, and no impacts to this species are anticipated.
Lakeside ceanothus (<i>Ceanothus cyaneus</i>)	NCCP CRPR 1B.2	Chaparral	This species is not expected to occur in the work areas, as it was not observed during the survey, and would have been observed if present. As a result, no impacts to this species are anticipated.
Wart-stemmed ceanothus (<i>Ceanothus verrucosus</i>)	NCCP CRPR 2B.2	Coastal and southern maritime chaparral	While potentially suitable habitat for this species occurs in the surrounding areas of much of the work areas, suitable habitat does not occur within any of the work areas. This is a large perennial species that would have been apparent at the time of the survey, if present. This species was observed in the chaparral habitat adjacent to pole Z479043; however, individuals were located outside of work areas. Therefore, no impacts to this species are anticipated.
Summer holly (<i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>)	CRPR 1B.2	Chaparral, cismontane woodland	This species is not expected to occur in the work areas, as it was not observed during the survey and would have been observed if present. As a result, no impacts to this species are anticipated.
Short-leaved dudleya (<i>Dudleya blochmaniae</i>)	NCCP NE SE CRPR 1B.1	Coastal sage scrub, chaparral	Although the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25 are located partially within coastal sage scrub habitat, this species is very restricted and is generally associated with unique sandstone formations. The likelihood of occurrence at any sites listed above is very low. While potentially suitable habitat for this species occurs in much of the surrounding coastal sage scrub and coastal sage scrub/chaparral mix habitat of the Proposed Project Modification, no individuals were observed during the survey. No impacts to this species are anticipated.

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
San Diego button celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	NCCP FE, CE CRPR 1B.1	Vernal pools, marshy areas with white clay soils	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	NCCP CRPR 2B.1	Coastal sage scrub, valley grassland	Potentially suitable habitat for this species occurs within sites located partially within coastal sage scrub habitat, and in the immediate surrounding areas of the work sites. However, this species is a perennial succulent that would have been apparent at the time of the survey, if present. This species was observed on vegetated slopes off of the access road south of Z479049 and GS-28. However, no individuals of this species were observed within or immediately adjacent to work areas and no impacts to this species are anticipated.
Campbell's liverwort (<i>Geothallus tuberosus</i>)	CRPR 1B.1	Shady areas in moist coastal sage scrub habitat and vernal pools	Not expected to grow within any of the coastal sage scrub within the work areas at poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these areas is relatively open and dry. While potentially suitable habitat occurs in the understory of dense shaded poison oak (<i>Toxicodendron diversilobum</i>) within a total of 16 square feet of the work area of GS-21, this species is not expected to occur as it is only known from a locality in the Proposed Project Modification vicinity, and is not known to occur within the work areas or immediately surrounding habitats. Therefore, no impacts to this species are anticipated.
Graceful tarplant (<i>Holocarpha virgata</i> ssp. <i>elongata</i>)	CRPR 4.2	Clay soils in chaparral, cismontane woodland, coastal sage scrub, grassland, and disturbed areas	Observed during the survey, although not documented by the CNDDB within one mile of the Proposed Project Modification. This species was locally abundant within the surrounding areas of the Proposed Project Modification, and individuals were observed within the work areas at poles Z479046 and Z479047, as well as within portions of the access roads, some of which are regularly maintained, and some of which are avoided by maintenance activities due to the presence of road ruts, which could support vernal pool species. As stated in the FEIR, because of the lower sensitivity of this species, and low number of individuals impacted, impacts would be less than significant. No mitigation is required.
Coulter's goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>)	CRPR 1B.1	Coastal salt marsh, playas, vernal pools	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
Robinson's	CRPR 4.3	Chaparral, coastal sage	Potentially suitable habitat for this species occurs

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
peppergrass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)		scrub	within portions of the work areas at poles Z479049, Z479050, GS-21, GS-23, and GS-25. It was not detected due to the time of year of survey. As stated in the FEIR, because of the lower sensitivity of this species, and small areas within which individuals could potentially be impacted by the Proposed Project Modification, impacts would be less than significant. No mitigation is required.
Willow monardella (<i>Monardella viminea</i>)	NCCP NE FE, CE CRPR 1B.1	Coastal sage or riparian scrub in sandy creek bottoms and on banks of ephemeral washes	The work areas at GS-22 and GS-23 are located immediately adjacent to a sandy-bottomed creek and provide habitat potentially suitable for this species. However, this species is a robust perennial that would have been detectable at the time of the survey, if present. This species was not detected during the survey, and no impacts to this species are anticipated.
Spreading navarretia (<i>Navarretia fossalis</i>)	NCCP FE CRPR 1B.1	Vernal pools and swales	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
San Diego mesa mint (<i>Pogogyne abramsii</i>)	NCCP FE, CE CRPR 1B.1	Vernal pools	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
Nuttall's scrub oak (<i>Quercus dumosa</i>)	CRPR 1B.1	Sandy or clay soils in chaparral, coastal sage scrub, and closed-cone coniferous forests	Observed during the survey along a portion of the access road to pole Z479040, immediately adjacent to GS-21, and approximately 30 feet north of pole P479046, along the access road and east perimeter of the work area. Individuals would be flagged for avoidance, prior to construction. Therefore, impacts to this species are not anticipated.
Ashy spikemoss (<i>Selaginella Cinerascens</i>)	CRPR 4.1	Coastal sage scrub, chaparral	Observed during the survey, although not documented by the CNDDDB within one mile of the Proposed Project Modification. An approximate 6-square-foot patch of this species was observed within a portion of the work area at pole P479050. Additionally, this species was observed immediately north of the work area at pole P479046 and approximately 30 feet south of the work area at pole P479048; however, these areas would not be accessed for the Proposed Project Modification. As stated in the FEIR, because of the lower sensitivity of this species, and low number of individuals impacted, impacts would be less than significant. No mitigation is required.

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
Salt spring checkerbloom (<i>Sidalcea neomexicana</i>)	CRPR 2B.2	Wetland habitats within chaparral, coastal sage scrub, yellow pine forests, and riparian areas	Habitat suitable for this species does not occur within any of the work areas or access roads and this species was not observed during the survey. As a result, no impacts to this species are anticipated.
Bottle liverwort (<i>Sphaerocarpos drewei</i>)	CRPR 1B.1	Coastal sage scrub	Not expected to grow within any of the coastal sage scrub within the work areas at poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these areas is relatively open and dry. While potentially suitable habitat occurs in the understory of dense shaded poison oak (<i>Toxicodendron diversilobum</i>) within a total of 16 square feet of the work area of GS-21, this species is not expected to occur as it is only known from a locality in the Proposed Project Modification vicinity, and is not known to occur within the work areas or immediately surrounding habitats. Therefore, no impacts to this species are anticipated.

¹Status:

NCCP = covered under SDG&E’s NCCP; NE=Narrow Endemic covered under SDG&E’s Subregional NCCP

FE = Federally Endangered species

FT = Federally Threatened species

CE = State of California Endangered species

CRPR = California Rare Plant Rank

1A: Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere

1B: Plants Rare, Threatened, or Endangered in California and Elsewhere

2A: Plants Presumed Extirpated in California, But Common Elsewhere

2B: Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere

3: Plants About Which More Information is Needed - A Review List

4: Plants of Limited Distribution – A Watch List

0.1-Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)

0.2-Moderately threatened in California (20–80% occurrences threatened/moderate degree and immediacy of threat)

0.3-Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)



Legend

- (Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

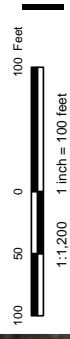
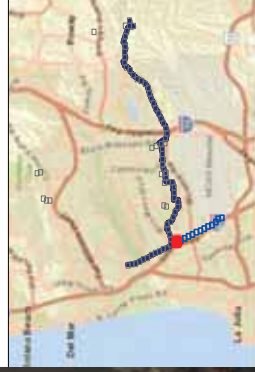
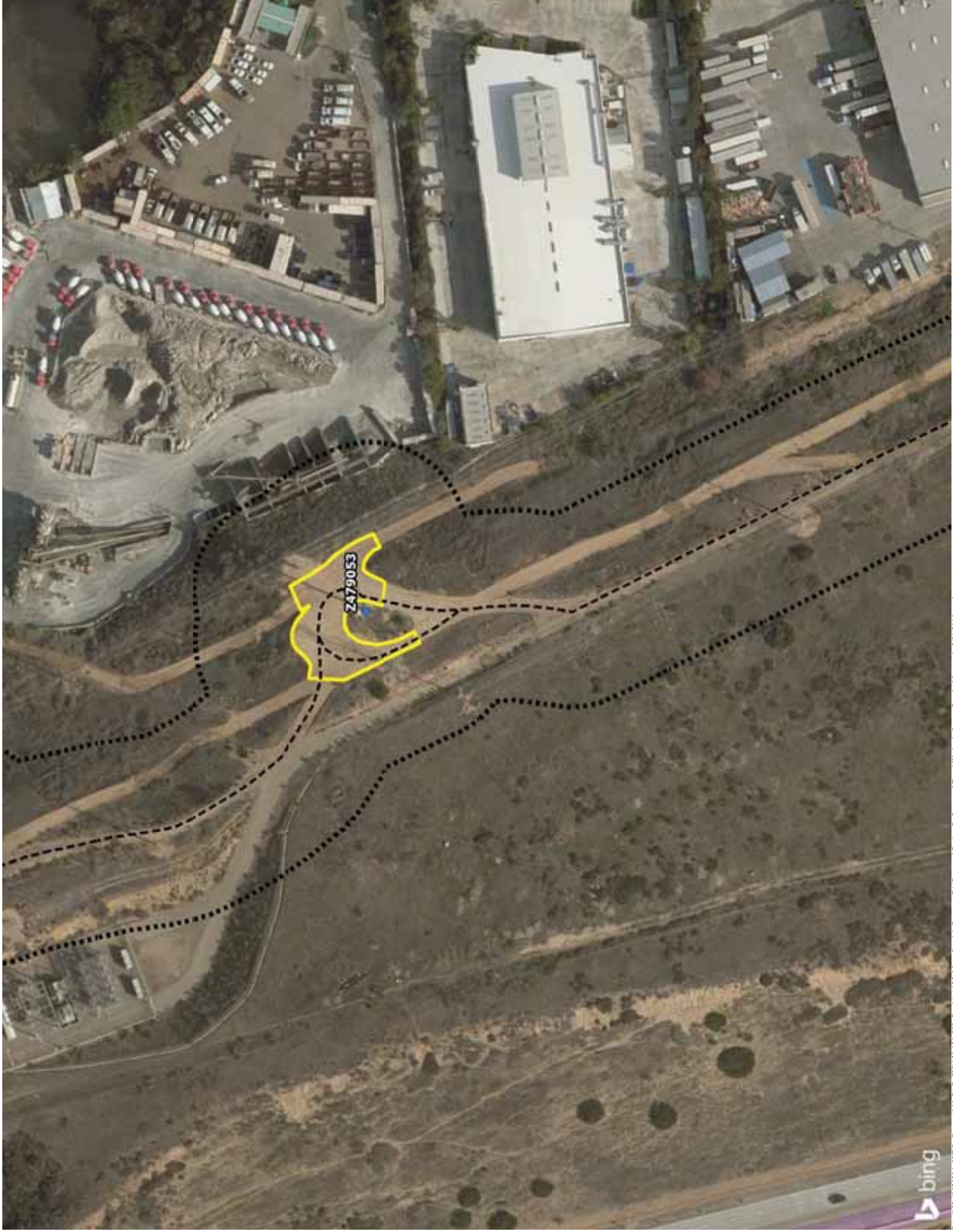
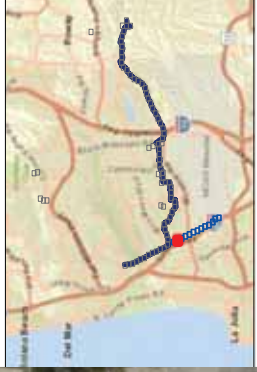


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 1
2/21/2018



Legend

- (Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer



100 50 0 100 Feet
1:1,200 1 inch = 100 feet

Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 2
2/21/2018



Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

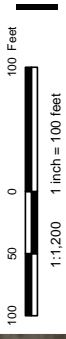
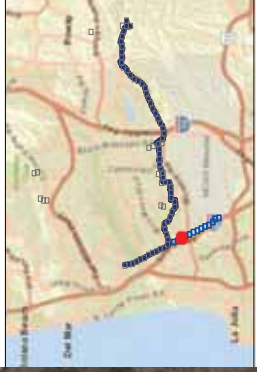
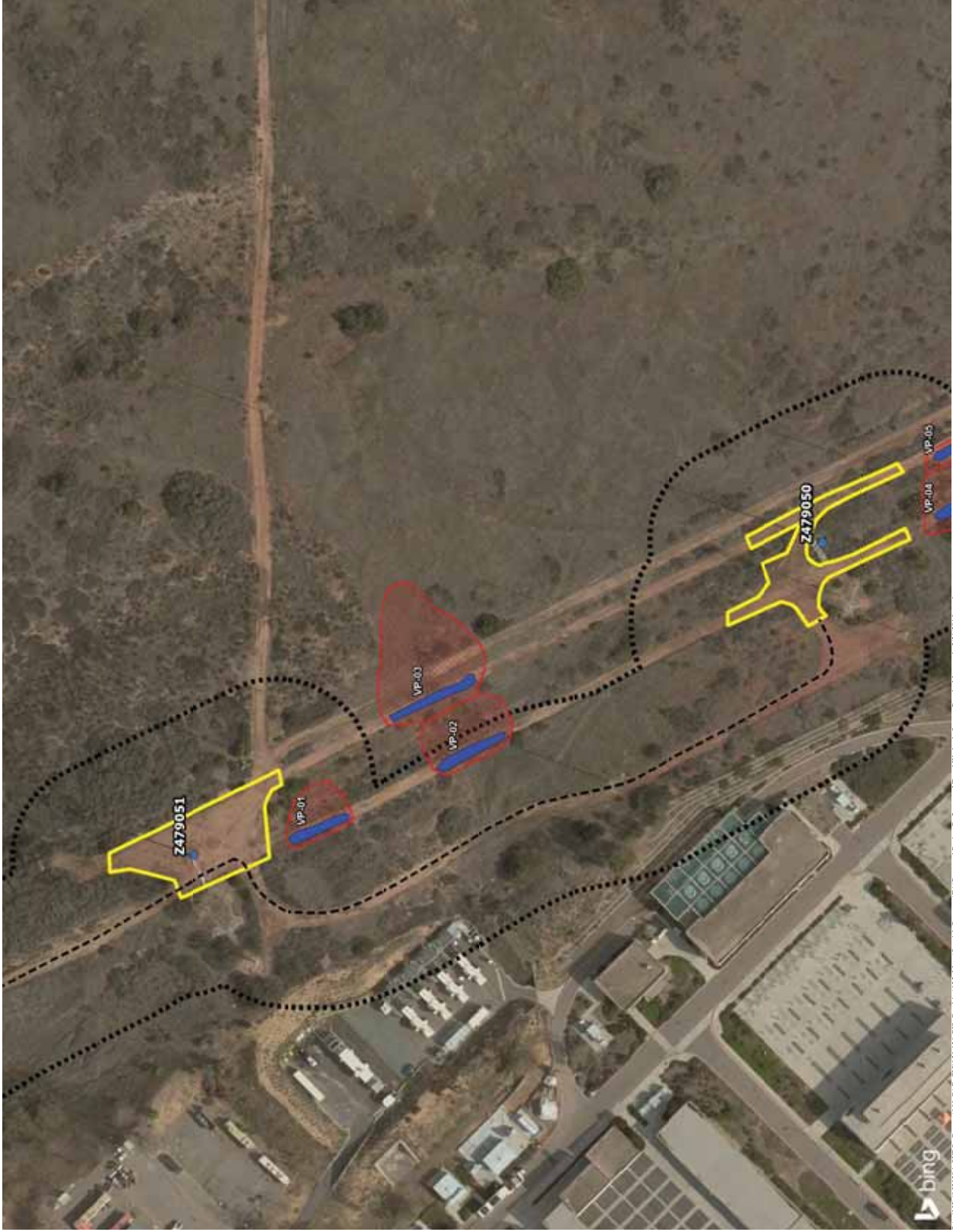


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 3
2/21/2018

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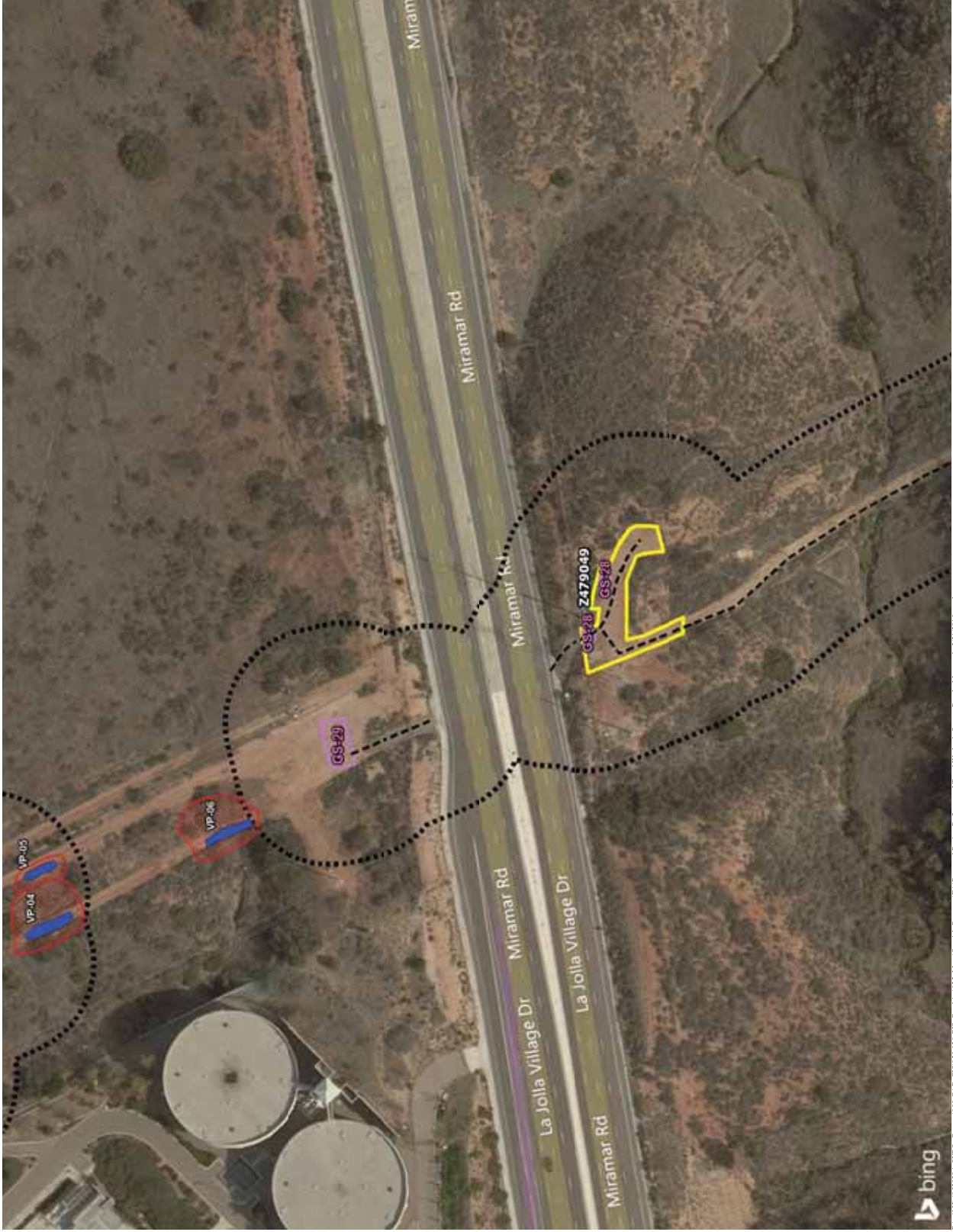


- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer
 - Disturbed Road Pools - Present
 - Vernal Pool Watersheds



Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 4
 2/21/2018

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Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Disturbed Road Pools - Present
- Vernal Pool Watersheds

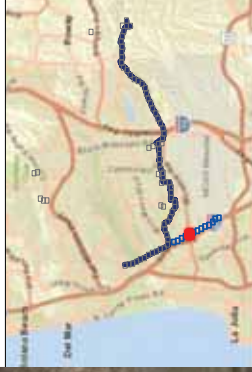
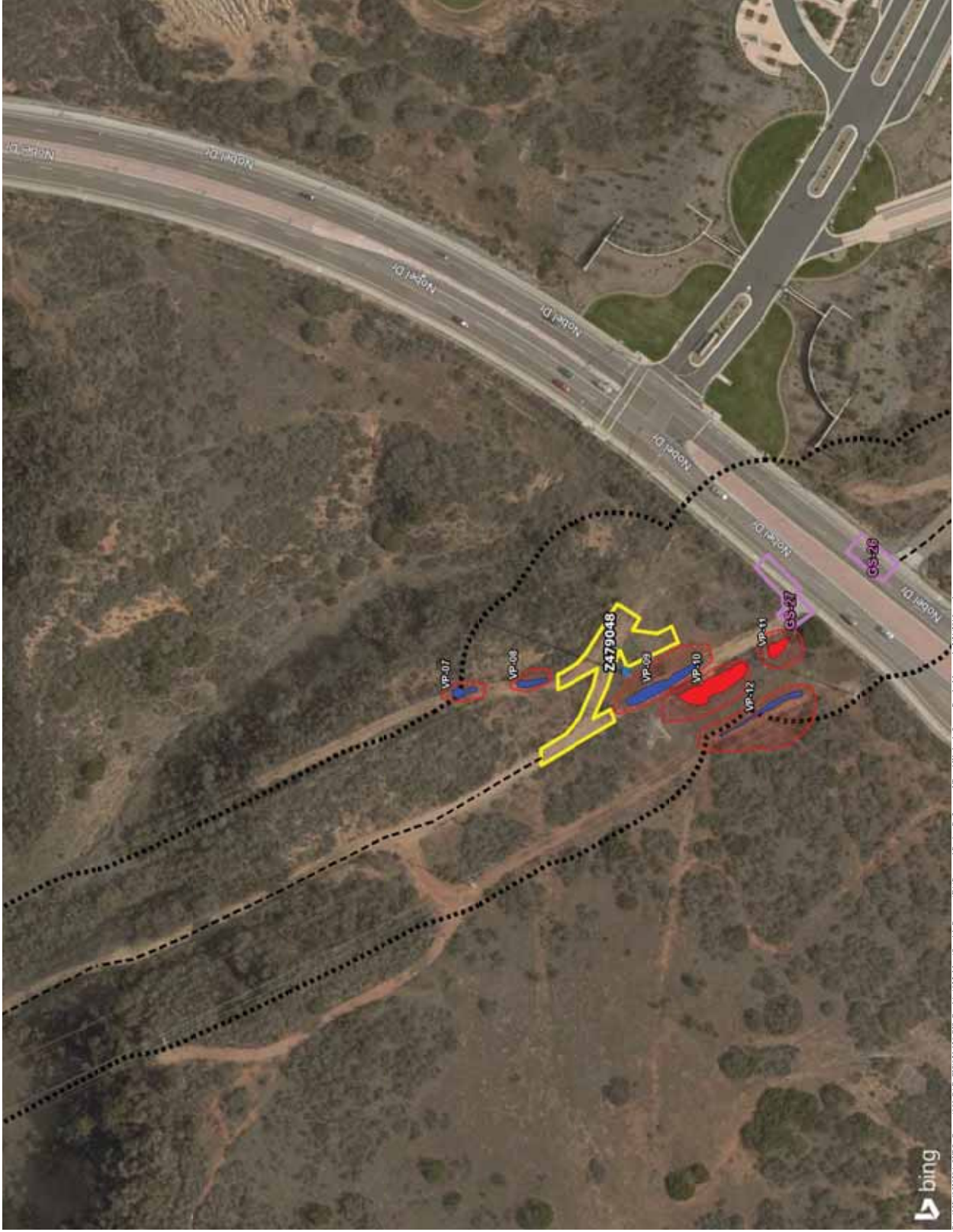


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 5
 2/21/2018

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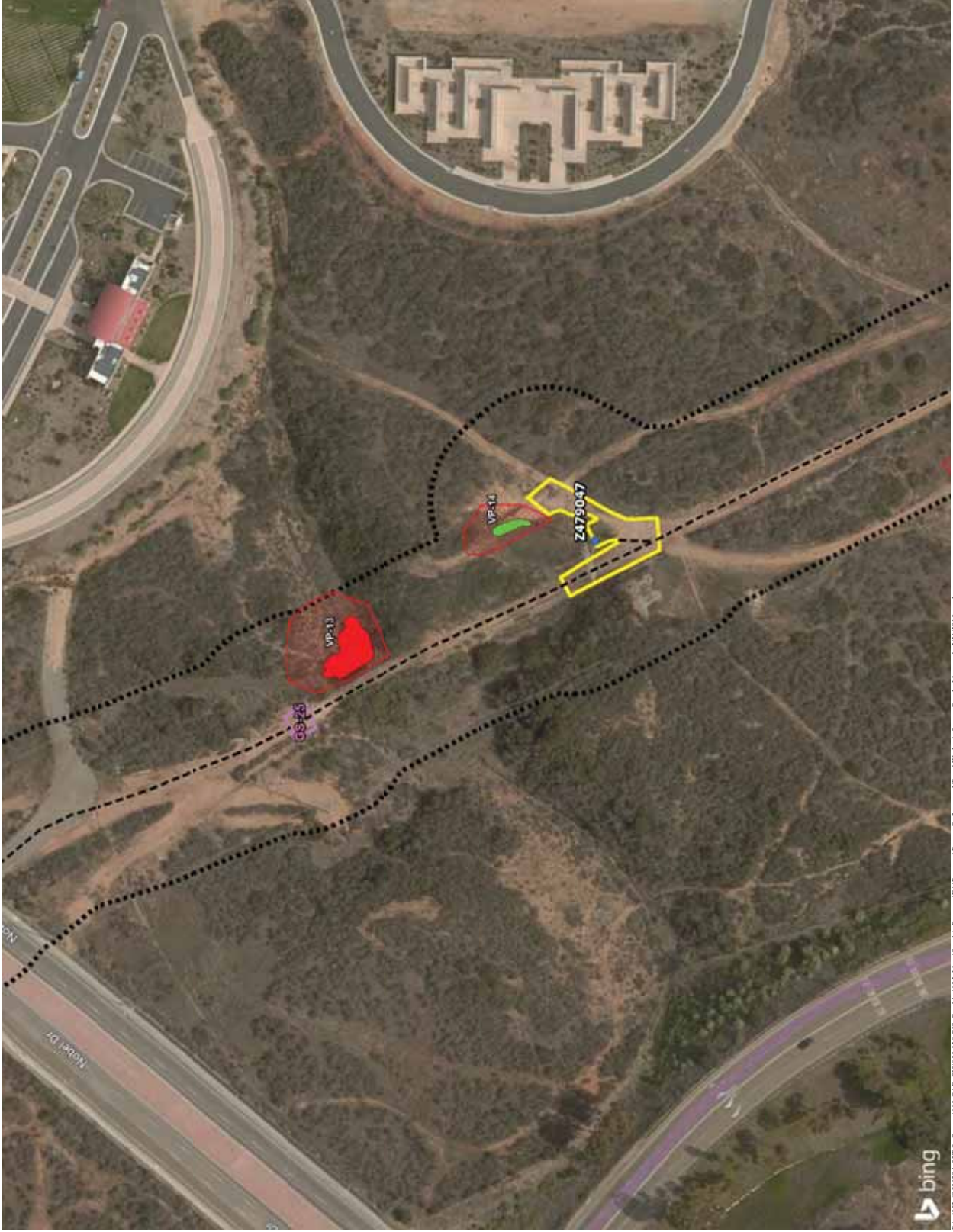
Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Disturbed Road Pools - Present
- Vernal Pools - Present
- Vernal Pool Watersheds



Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 6
2/21/2018





- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer
 - Vernal Pools - Present
 - Historic Road Pools - Not Present
 - Vernal Pool Watersheds

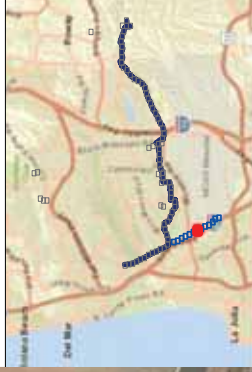


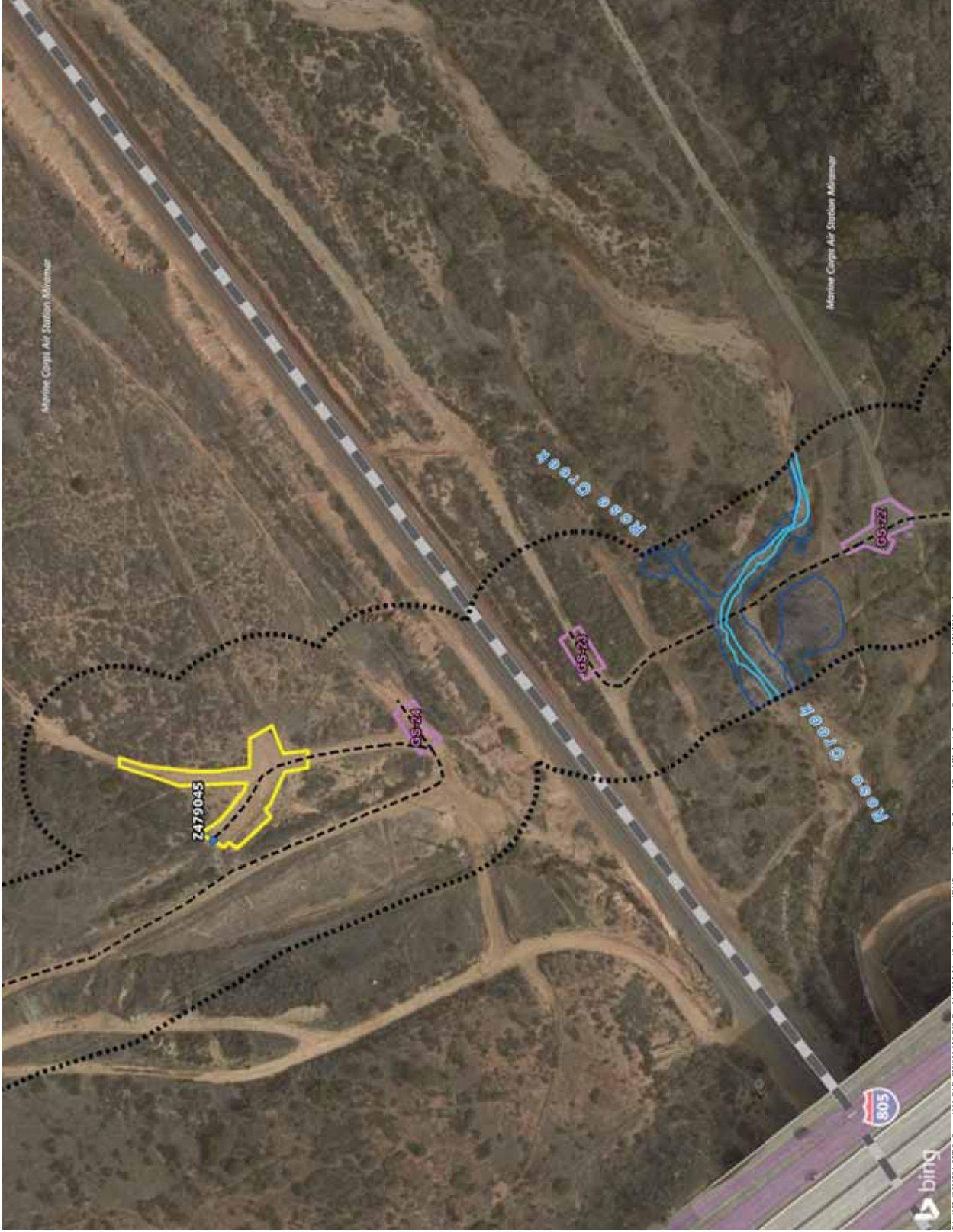
Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 7
 2/21/2018



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - 100ft Buffer
 - Disturbed Road Pools - Present
 - Vernal Pools - Present
 - Historic Vernal Pools - Not Present
 - Vernal Pool Watersheds



Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 8
 2/21/2018



Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- CDFW Jurisdiction
- Ordinary High Water Mark (OHWM)

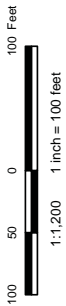
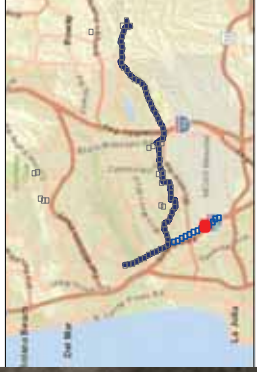
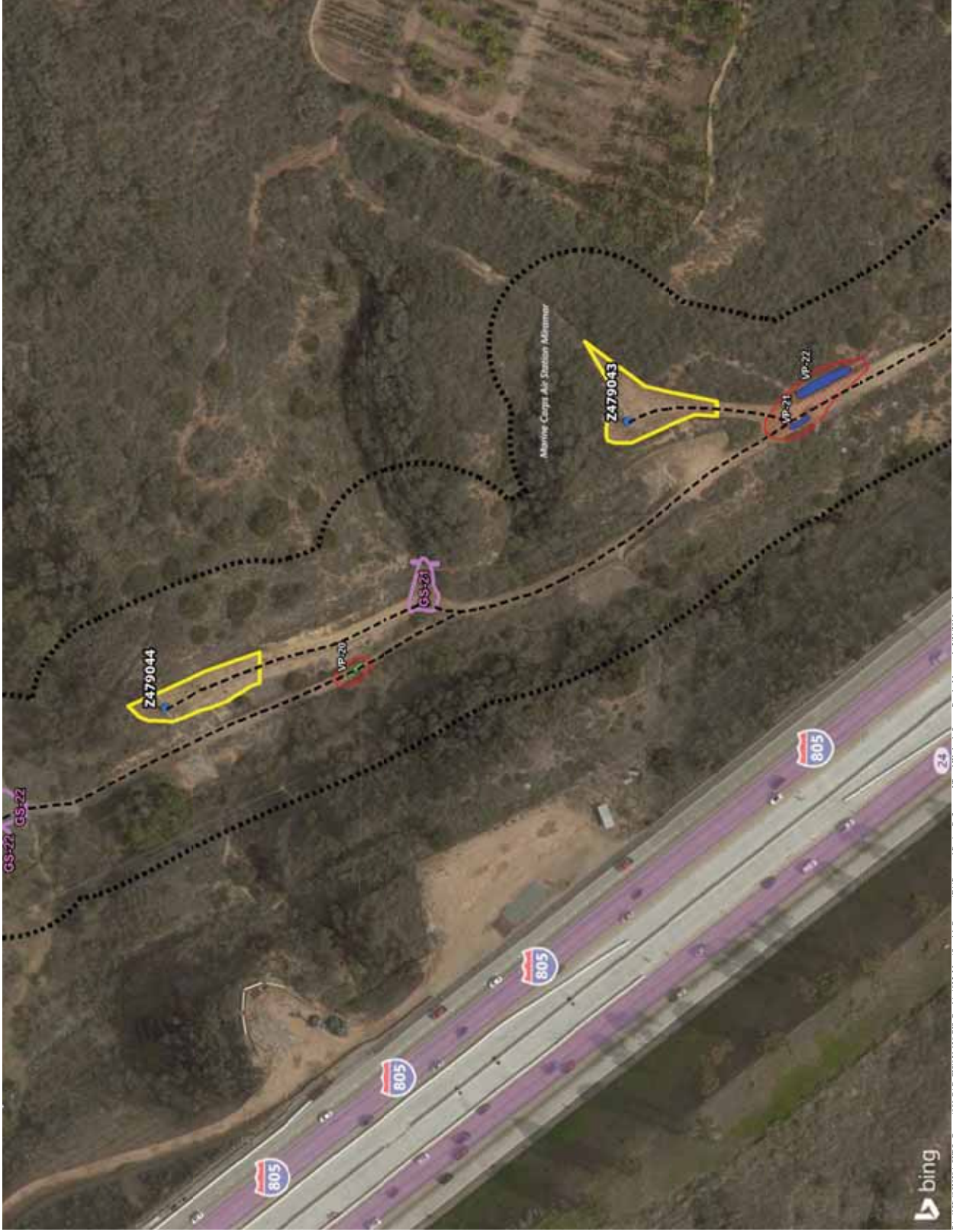


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 9
2/21/2018



Legend

- () Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Disturbed Road Pools - Present
- Historic Road Pools - Not Present
- Vernal Pool Watersheds

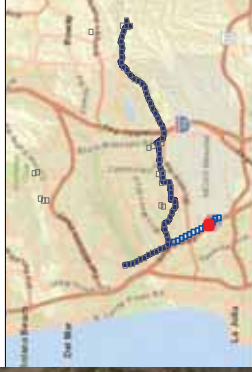


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 10
2/21/2018

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Legend

- () Poles
- - - Access Road
- Temporary Work Area
- - - 100ft Buffer
- Historic Road Pools - Not Present
- Vernal Pool Watersheds

Figure 3.4-2

**Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 11**

2/21/2018



- Legend**
- () Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure
 - 100ft Buffer

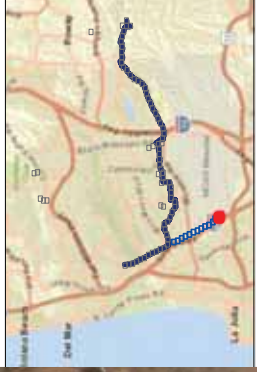


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 12
2/21/2018



Legend

- (Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer



100 50 0 100 Feet
 1:1,200 1 inch = 100 feet

Figure 3.4-2
 Sycamore to Peñasquitos
 Proposed Project Refinement
 Vernal Pools and Wetlands Map 13
 2/21/2018

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3.4.1.6 Special-Status Wildlife

Table 3.4-3 includes special-status wildlife species documented by the CNDDDB within one mile of the Proposed Project Modification. Surveys of the Proposed Project Modification area included searching for these species as well as other sensitive species.

Table 3.4-3: Special-Status Wildlife Species

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
Orange-throated whiptail (<i>Aspidoscelis hyperythra</i>)	NCCP	Coastal sage scrub, chaparral, riparian woodlands; disturbed places adjacent to these habitats	Suitable habitat (coastal sage scrub) for orange-throated whiptail occurs throughout the Proposed Project Modification area excluding Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. However, this species was not observed during the survey, and no impacts to this species are anticipated with implementation of APMs and MMs in the FEIR.
Coastal whiptail (<i>Aspidoscelis tigris stejnegeri</i>)	SSC	Occurs in coastal southern California from sea level to 7,000 feet above mean sea level. It prefers dry open areas in chaparral or coastal sage scrub with relatively sparse foliage	Habitat potentially suitable for this species occurs throughout the Proposed Project Modification area, including sites containing coastal sage scrub and access roads adjacent to coastal sage scrub and chaparral vegetation communities. With implementation of the MMs outlined in the FEIR, no significant impacts to this species are anticipated.
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	NCCP FE	Vernal pools	Suitable vernal pool habitat for this species does not occur within any of the work areas. However, evidence of ponding was visible within low-lying and rutted portions of the dirt access roads between the work areas. Ponded areas within the access roads are considered suitable habitat for this species. This species was not observed during the survey. Impacts to this species would be avoided as vehicles would not access portions of access roads containing vernal pools.
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>)	NCCP SSC	Chaparral, coastal sage scrub, desert scrub	Several of the work areas contain coastal sage scrub vegetation communities which provide habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the work sites being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix habitat, the surrounding areas of the Proposed Project Modification, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for San Diego desert woodrat. A midden potentially belonging to this species was observed within the southwest portion of GS-23 (32.865319,-117.188133). Impacts to this species would be avoided by following the recommendations in Mitigation Monitoring, Compliance and Reporting Program MM Biology-9 from the FEIR.

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
Coastal California gnatcatcher <i>(Polioptila californica californica)</i>	NCCP FT SSC	Coastal sage scrub	Several of the work areas contain coastal sage scrub vegetation communities which provide habitat potentially suitable for this species, including the work areas for Z479048, Z479049, GS-21, GS-23, and GS-25. Due to many of the work areas being partially surrounded by coastal sage scrub and/or coastal sage scrub/chaparral mix vegetation communities, the surrounding areas of the Proposed Project Modification, excluding Z479040, Z479041, Z479042, GS-19, and GS-20, provide moderate quality habitat for coastal California gnatcatcher. Coastal California gnatcatcher was observed adjacent to pole Z479055 (32.887303, -117.201360). Impacts to this species would be avoided by conducting work outside of the breeding season and/or conducting pre-construction nesting bird surveys if work is to occur during the breeding season.
San Diego coast horned lizard <i>(Phrynosoma blainvillii)</i>	NCCP SSC	Chaparral, coastal sage scrub, riparian woodland, conifer forest, grassland	Suitable habitat within these vegetation communities consists of loose soils with open bare ground. Potentially suitable habitat for this species occurs at all work areas and within adjacent access roads, with the exception of Z479040, Z479041, Z479042, GS-19, GS-20, and their surrounding areas. This species was not observed during the pre-activity survey; however, there is potential for the San Diego coast horned lizard to occur throughout the majority of the Proposed Project Modification area. No impacts to this species are anticipated with implementation of APMs and MMs in the FEIR.

¹Status:

NCCP = covered under SDG&E’s NCCP

FE = Federally Endangered species

FT = Federally Threatened species

SSC = California Department of Fish and Wildlife Species of Special Concern

3.4.2 Potential Impacts

The total additional temporary work space being requested in this Proposed Project Modification is 3.12 acres, which consists primarily of impacts to non-sensitive areas. No permanent impacts would result from the Proposed Project Modification. Table 3.4-4 includes impacts to sensitive and non-sensitive habitat types that would result from the Proposed Project Modification.

Table 3.4-4: Proposed Project Modification Impacts

Land Cover Type	Temporary Impacts	
	Acres	Square Feet
Developed (Existing Access Roads and Pads)	2.93	127,682
Disturbed/Bareground (Outside of Existing Access Roads and Pads)	0.15	6,490
Sensitive Habitat (CSS & CSS/Chaparral Mix)	0.04	1,735
Total including habitat	3.12	135,907

SDG&E would be operating under its own NCCP, which was established according to the Federal Endangered Species Act and California Endangered Species Act and the state's Natural Community Conservation Planning Act. SDG&E operational protocols are included in Appendix G of the FEIR. In addition, SDG&E would implement the project-specific APMs found in Section 4.1 of the FEIR, to further minimize potential impacts to ensure the protection and conservation of listed and covered species and their habitats.

Temporary impacts to sensitive habitat types would be mitigated through the project-specific Habitat Restoration Plan based on the requirements found in the SDG&E Enhancement and Monitoring Program described in Section 7.2 of the NCCP and the project's FEIR.

All impacts to known or potential jurisdictional areas would be avoided through project design and utilization of appropriate BMPs during implementation of the Proposed Project Modification.

3.4.2.1 Significance Criteria

- a) **Would construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any plant species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

Less than Significant with Mitigation

Special-status plant species would be impacted during construction of the Proposed Project Modification. Approximately 6 square feet of ashy spikemoss and possibly several (estimated less than 100) individuals of graceful tarplant would be directly impacted by construction access. These species are ranked CRPR 4, indicating they are species of limited distribution. Due to the low sensitivity of these species, and low number of individuals impacted, impacts would be less than significant consistent with Section 4.1.13.2 (p. 4.1-152) of the FEIR. Impacts from the Proposed Project Modification would not significantly impact the populations of these species through the implementation of MM Biology-1a through g, MM Biology-2, MM Biology-3, MM Fire -1, MM Fire-2, MM Fire-3, and MM Fire-4. No direct impacts to other sensitive plant species are anticipated.

- b) Would construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any invertebrate species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

Less than significant with mitigation

San Diego fairy shrimp could occur within vernal pools within the PSA. Due to the time of year of the biological surveys, no surveys for fairy shrimp were conducted. Therefore, full avoidance of vernal pools is proposed. Work areas are sited outside of vernal pools and access routes would avoid vernal pools. Therefore, no direct impacts to San Diego fairy shrimp are anticipated. No impacts to other special-status invertebrate species are anticipated.

Construction disturbance could indirectly impact San Diego fairy shrimp through increased erosion and sedimentation; fugitive dust; release of toxic substances (e.g., oil); and invasive, non-native plant species (weeds) introduction and/or spread. As described in the FEIR, SDG&E would implement APM AIR-1 and APM HYDRO-2 as part of the Proposed Project Modification to control fugitive dust and erosion/sedimentation, respectively. Furthermore, SDG&E would implement APMs HAZ-1 and HAZ-2 as part of the Proposed Project Modification, which address the handling of hazardous materials. Impacts from erosion, fugitive dust, and toxic substances would be less than significant.

If non-native, invasive species were introduced to San Diego fairy shrimp habitat, these non-native species could outcompete native plant species and degrade vernal pools, resulting in a significant impact. SDG&E would implement MM Biology-3 as described in the FEIR (preparation and implementation of a Weed Control Plan) to reduce impacts. Consistent with the FEIR (p. 4.1-153), impacts would be less than significant with mitigation.

- c) Would construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any amphibian species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

No Impact

No special-status amphibian species are known to occur within the Proposed Project Modification area.

- d) Would construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any reptile species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

Less than Significant with Mitigation

The Proposed Project Modification has the potential to impact special-status reptile species, including San Diego coast horned lizard, orange-throated whiptail, and coastal whiptail, which

have a moderate or high potential to occur because the Proposed Project Modification would impact potential habitat for these species, including coastal sage scrub and chaparral. Implementation of APMs AIR-1 (fugitive dust control) BIO-2 (SDG&E Subregional NCCP), and HYDRO-2 (erosion control), as well as MMs Biology-1a (general field personnel behavior requirements), Biology-1b (environmental training program), Biology-1c (pre-activity surveys), Biology-1d (operational protocols), Biology-3 (preparation and implementation of a Weed Control Plan), and Biology-6 (compensatory mitigation for impacts to habitat) would reduce impacts to special-status reptiles. Consistent with the FEIR (p.4.1–154) impacts would be less than significant with mitigation.

- e) Would the construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any avian species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

Less than Significant with Mitigation

The Proposed Project Modification has the potential to impact one special-status avian species, coastal California gnatcatcher, which has a moderate or high potential to occur because the Proposed Project Modification would impact potential habitat for this species, including coastal sage scrub. Direct and indirect impacts associated with injury, mortality, and impacts to habitat would be significant. Implementation of APMs such as AIR-1 (fugitive dust control), BIO-2 (SDG&E Subregional NCCP), and HYDRO-2 (erosion control), as well as MMs Biology-3 (preparation and implementation of a Weed Control Plan), and Biology-7 (mitigation for bird species) would reduce impacts to special-status avian species. Consistent with the FEIR (p.4.1-155), impacts would be less than significant with mitigation.

- f) Would construction of the Proposed Project Modification have a substantial adverse effect, either directly or through habitat modifications, on any mammalian species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

Less than Significant with Mitigation

The Proposed Project Modification has the potential to impact one special-status mammal species, San Diego desert woodrat, which has a moderate or high potential to occur because the Proposed Project Modification would impact potential habitat for this species, including coastal sage scrub and chaparral. Direct and indirect impacts associated with injury, mortality, and impacts to habitat would be significant. Implementation of existing APMs such as AIR-1 (fugitive dust control), BIO-2 (SDG&E Subregional NCCP), and HYDRO-2 (erosion control), as well as MMs Biology-3 (preparation and implementation of a Weed Control Plan), and Biology-9 (San Diego desert woodrat mitigation) would reduce impacts to special-status mammals. Consistent with the FEIR (p. 4.1-155), impacts would be less than significant with mitigation.

- g) Would the Proposed Project Modification have a substantial adverse effect from operation and maintenance, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?**

No Impact

No O&M activities are included within the Proposed Project Modification.

- h) Would the Proposed Project Modification cause a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?**
- i) Would the Proposed Project Modification cause a substantial adverse effect on federally protected wetlands and waters as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) or waters of the State through direct removal, filling, hydrological interruption, or other means?**

Less than Significant with Mitigation

The Proposed Project Modification would not permanently impact sensitive natural habitat. Temporary impacts to sensitive habitat types, including coastal sage scrub and chaparral, resulting from vehicle traffic, foot traffic, and temporary guard structures total 1,735 square feet (0.04 acre). The Proposed Project Modification work areas are located outside of federally protected wetlands and waters. As noted in Appendix II, if the contractor must cross Rose Creek to install GS 23 for work Poles Z479044 and Z479045 (not expected to be needed), the use of steel plates to facilitate vehicle and equipment travel across the creek is not expected to impact potential jurisdictional waters.

Sensitive habitat and wetlands may also be indirectly impacted by increased erosion and sedimentation; fugitive dust; and invasive, non-native plant species introduction and/or spread. Implementation of APM AIR-1 (fugitive dust control), APM HYDRO-2 (erosion control), as well as MMs Biology-3 (preparation and implementation of a Weed Control Plan), Biology-6 (compensatory mitigation for impacts to habitat), and Biology-11 (reseeding following fires) would reduce impacts to sensitive natural communities and wetlands. Consistent with the FEIR (p. 4.1-156-157), impacts would be less than significant with mitigation.

- j) Would the Proposed Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less than Significant

The Proposed Project Modification does not include any new permanent structures. The temporary guard structures would be located within an existing SDG&E ROW that is occupied by existing transmission poles. The Proposed Project Modification would only require re-sagging of conductor to equalize tension on existing poles; therefore, the Proposed Project Modification

would not add linear areas of disturbance that would interrupt habitat for wildlife movement corridors. Wildlife would be able to move around the temporary work areas during construction and after construction is complete. Consistent with the FEIR (pp 4.1-158), impacts from construction of the Proposed Project Modification would be less than significant.

k. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy, or ordinance?

No Impact

The Proposed Project Modification would include minimal vegetation clearing and trimming around existing roads and pads. Additionally, the Proposed Project Modification would be consistent with the City's Land Development Code Environmentally Sensitive Lands (ESL) Regulations and Biology Guidelines. Temporary impacts would be restored in place as required by MM Biology-6, consistent with the ESL regulations and Biology Guidelines. Therefore, no conflicts with local policies or ordinances exist.

l. Would the Project conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan?

No Impact

The Proposed Project Modification is located within the SDG&E Subregional NCCP area, the City of San Diego MSCP Subarea Plan, and MCAS Miramar. The Proposed Project Modification would implement the SDG&E NCCP Operational Protocols and would be consistent with the MSCP Subarea Plan General Policies and Design Guidelines, and the MCAS Miramar Integrated Natural Resources Management Plan. Consistent with the FEIR (pp 4.1-111-112) there would be no impact.

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3.5 CULTURAL RESOURCES

3.5.1 Existing Conditions

In order to prepare the existing conditions section below, a cultural resource study of the Proposed Project Modification area was completed in August 2017. The study included a records search, a desktop review, and a pedestrian survey of locations that had not been previously surveyed (Figure 2-2). Additional information regarding cultural resources was obtained from the FEIR (CPUC 2016).

3.5.1.1 Cultural Records Search

As part of the cultural resources study prepared for the Proposed Project Modification, a cultural resources records search was completed with the California Historic Resources Information System (CHRIS) through the South Coastal Information Center (SCIC) housed at San Diego State University Research Foundation (SDSURF). SDG&E conducted the records search under contract to SCIC (SDSURF), and provided the data to AECOM on August 15, 2017. The records search data included all recorded archaeological and historic site records and cultural resource reports within a 0.25-mile radius of the Proposed Project Modification area. Additional resources that were consulted for relevant information included the National Register of Historic Places (NRHP), the Historic Property Data File, the California Register of Historical Resources (CRHR), California Historical Landmarks, the California Inventory of Historic Resources, the California Points of Historical Interest, and historic maps. A cultural resources survey report was prepared for the Proposed Project Modification and has been included as Appendix I.

3.5.1.2 Native American Consultation

With the implementation of Assembly Bill (AB) 52, lead agencies are now required to offer Native American tribes, with an interest in Tribal Cultural Resources (TCRs) located within their jurisdictions, the opportunity to consult on CEQA documents. The procedures under AB 52 provide the tribes with an opportunity to take an active role in the CEQA process to protect TCRs. Therefore, if supplemental CEQA documentation is deemed necessary for this Proposed Project Modification, the CPUC as the lead State agency would contact the Native American tribes identified by NAHC with an interest in the Proposed Project Modification Area prior to the release of the CEQA document. It is ultimately the CPUC's responsibility to conduct formal tribal consultation under AB 52.

For additional details on applicable regulations and Native American consultation efforts, please see Section 4.3.2 (p. 4.3-6) of the FEIR.

3.5.1.3 Cultural Resources Field Survey Methods

The purpose of the cultural resource field survey was to relocate and update any previously recorded cultural resources, as well as to check for the presence/absence of any cultural resources on any previously unsurveyed portions of the Proposed Project Modification area that are located outside of MCAS Miramar. AECOM conducted a cultural resource field survey of the Proposed Project Modification area, in addition to a 98-ft. (30-meter) radius around each pole

location and stringing site. MCAS Miramar is considered 100 percent inventoried; therefore, supplemental cultural resource surveys of MCAS property were not conducted (ASM Affiliates 2011). Of the 30 proposed work locations, 24 were located on MCAS Miramar property and were not surveyed. AECOM’s cultural field surveys were conducted on August 17, 2017, with an additional field visit on August 25, 2017.

The total pedestrian field survey area was approximately 2.17 acres. Areas that had a low potential for cultural resources due to slopes greater than 25 percent or were inaccessible because of dense brush or ground cover were reviewed via a desktop analysis. In locations where sites had been previously recorded, transect spacing was decreased to 5 meters. Previously recorded sites on MCAS Miramar were not revisited as part of this study. Evidence for buried cultural deposits was observed through natural or artificial erosional exposures and the spoils from rodent burrows. The pedestrian surveys complied with the California Office of Historic Preservation instructions for recording cultural resources. All prehistoric and historic sites, both newly discovered and previously recorded (if re-identified in the field), were recorded. No artifacts were collected during the surveys. The field survey results and report can be found in Appendix I.

3.5.2 Environmental Setting

The existing conditions of cultural resources applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below.

3.5.2.1 Cultural Setting

Historic Background

For details on the Historic Background, please see Section 4.3.3.4 (pp. 4.3-21 and 4.3-22) of the FEIR.

Cultural Resources in the Proposed Project Modification Area

Records Search Results

The records search results were taken from the cultural resources letter report (Ports and Foglia 2017) prepared on September 6, 2017 (see Appendix I). Table 3.5-1 includes the 37 cultural resources previously recorded within 0.25 mile of the Proposed Project Modification Area. The 37 cultural resources include 23 archaeological sites and 14 isolates. The archaeological sites consist of 21 prehistoric sites, one historic site, and one multicomponent site. The 14 isolate resources are all prehistoric.

**Table 3.5-1: Record Search Results within 0.25 Mile of the
Proposed Project Modification Area**

Site/Isolate Designation	USGS Quad	Description	NRHP/CRHP Status
CA-SDI-5605	Del Mar	Prehistoric lithic scatter	Not evaluated
CA-SDI-5606	Del Mar	Prehistoric lithic scatter	Not evaluated
CA-SDI-5608	Del Mar	Prehistoric lithic scatter	Not evaluated
CA-SDI-8803	Del Mar	Prehistoric lithic scatter	Not evaluated
CA-SDI-10249	Del Mar	Prehistoric habitation site	Not evaluated
CA-SDI-10250	Del Mar	Prehistoric lithic scatter	Not eligible
CA-SDI-10251	Del Mar	Prehistoric lithic scatter	Not evaluated
CA-SDI-11763	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-11765	La Jolla	Historic trash scatter	Not eligible
CA-SDI-11788	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-11789	La Jolla	Prehistoric lithic scatter	Not evaluated
CA-SDI-12410	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12411	La Jolla	Prehistoric temporary camp	Not eligible
CA-SDI-12412	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12413	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12414	La Jolla	Prehistoric lithic scatter	Not evaluated
CA-SDI-12416	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12417	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12427	La Jolla	Prehistoric temporary camp	Not eligible
CA-SDI-12438	La Jolla	Prehistoric temporary camp	Not eligible
CA-SDI-12440	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12441	La Jolla	Prehistoric lithic scatter	Not eligible
CA-SDI-12927	Del Mar	Multicomponent trash and lithic scatter	Not eligible
P-37-014804	Del Mar	Prehistoric isolate	Not eligible
P-37-014805	Del Mar	Prehistoric isolate	Not eligible
P-37-014971	La Jolla	Prehistoric isolate	Not eligible
P-37-014972	La Jolla	Prehistoric isolate	Not eligible
P-37-014973	La Jolla	Prehistoric isolate	Not eligible
P-37-014974	La Jolla	Prehistoric isolate	Not eligible
P-37-014975	La Jolla	Prehistoric isolate	Not eligible
P-37-014976	La Jolla	Prehistoric isolate	Not eligible
P-37-014977	La Jolla	Prehistoric isolate	Not eligible
P-37-014978	La Jolla	Prehistoric isolate	Not eligible
P-37-014979	La Jolla	Prehistoric isolate	Not eligible
P-37-014980	La Jolla	Prehistoric isolate	Not eligible
P-37-014981	Del Mar	Prehistoric isolate	Not eligible
P-37-015215	Del Mar	Prehistoric isolate	Not eligible

Source: Appendix I: Letter Report: Minor Project Refinement 8, Sycamore - Peñasquitos 230-kV Transmission Line, San Diego.

Archaeological Field Survey Results

During the field survey, one previously recorded archaeological resource was relocated and updated by AECOM (CA-SDI-10250). Additionally, AECOM identified one new segment of a previously recorded resource (P-37-024739) and one new isolate (SXPQ-I-2). Table 3.5-2 includes a list of cultural resources identified during the field survey.

Table 3.5-2: Field Survey Results within 98 feet (30 meters) of the Proposed Project Modification Area

Site/Isolate Designation	USGS Quad	Description	NRHP/CRHR Status	Relocated
P-37-024739	Del Mar and La Jolla	Atchison, Topeka and Santa Fe Railroad	Eligible	Not applicable
CA-SDI-10250	Del Mar	Prehistoric lithic scatter	Not eligible	Yes
SXPQ-I-2	Del Mar	Prehistoric isolate	Not eligible	Not applicable

Source: Appendix I: Letter Report: Minor Project Refinement 8, Sycamore - Peñasquitos 230-kV Transmission Line, San Diego

P-37-024739: This resource is composed of a newly documented segment of the Atchison, Topeka and Santa Fe (AT&SF) Railroad. The railroad has been recorded under P-37-024739 elsewhere in San Diego County. P-37-024739 was originally recorded in 2002 by CRM Tech. It consists of the AT&SF Railroad, originally called the California Southern Railroad that was first constructed in 1880–1888 (Ballester and Woodard 2002). The AT&SF Railroad played a role in the development of San Diego County from 1880 to 1920. The resource was previously determined eligible for the NRHP in 1998, as well as recommended eligible for the CRHR and the City of San Diego’s Register of Historic Resources (Daly 2015). The current segment was identified during desktop review. Historic maps were referenced to determine the age of the railroad near the Proposed Project Modification area. The Proposed Project Modification would avoid impacts to the railroad.

CA-SDI-10250 (P-37-010250): This resource consists of a prehistoric temporary camp with a lithic scatter that was first recorded by RBR & Associates in 1985. RBR & Associates also conducted test units and surface scrapes. The site comprises a shallow subsurface deposit with manos, scrapers, choppers, and bifacial knives (Robbins-Wade 1985). In 1995, Gallegos & Associates expanded the site boundaries after recording flakes and stone tools west of the original site (Perry and Tift 1996). ASM Affiliates returned to the site in 2002 to perform a subsurface testing program at the site. They recommended the site as not significant under CEQA; based on this result, the site is not eligible for listing in the NRHP or CRHR (Pallette 2002). Most recently, AECOM visited a portion of the site in 2015 and did not relocate any artifacts within the portion of the site surveyed.

During the survey, two prehistoric artifacts were recorded just west of the site boundary. The assemblage consisted of a lithic tool and one mano (Ports and Foglia 2017). These artifacts are likely no longer in situ based on the location of the finds and disturbances present at the site. The site would be avoided during the Proposed Project Modification.

SXPQ-I-2: This prehistoric isolate consists of a mano located approximately 15 meters southwest of an existing pole (Ports and Foglia 2017). The isolate was discovered among a small pile of broken cobbles on the shoulder of an access road. The surrounding vegetation consists of small shrubs and tall weeds. The isolate is located just outside the work area boundary and would not be impacted.

3.5.3 Potential Impacts

Re-tensioning and sagging the line would not involve ground-disturbing activities; therefore, the impact analysis is focused on construction activities that are required for the installation of guard structures and temporary work areas as described in Chapter 2, Project Description.

3.5.3.1 CEQA Significance Criteria

a) Would the project cause a substantial adverse change in the significance of an archaeological and/or historical resource pursuant to CEQA Guidelines Section 15064.5? *Less than Significant with Mitigation*

There is one identified historical resource (P-37-024739) located within or adjacent to the Proposed Project Modification area where ground disturbance is proposed. The other two historical resources are adjacent to work locations where only overhead work would occur and are not included in the impact analysis. The one identified resource has been previously deemed eligible for the NRHP/CRHR. It has been evaluated for historical significance and qualifies as a historical resource as identified in CEQA Guidelines Section 15064.5(a). The resource is located outside of any areas that are planned for ground disturbance and it would not be impacted by the Proposed Project Modification.

Two of the proposed guard structure area locations are in the vicinity of the identified historical resource. Construction of the Proposed Project Modification (including ground-disturbing activities required for guard structure installation) could potentially impact unknown historical resources by disturbing subsurface soils, and potentially disturbing or destroying unknown buried cultural deposits. Four additional guard structure locations are proposed in areas of high sensitivity for buried historical deposits. The current design is far enough from the historical resource locations that no direct impacts should occur, with the implementation of APM CUL-2 and MM Cultural Resources-1 through 4. With the implementation of these APMs and MMs, any possible potential impacts to such historical and/or archaeological resources would remain less than significant.

b) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant with Mitigation

There are no known existing cemeteries, or previously recorded Native American or other human remains within or directly adjacent to the Proposed Project Modification area. Therefore, the potential for the inadvertent discovery of Native American or other human remains during subsurface construction associated with the Proposed Project Modification is considered low. In accordance with MM CUL-4, if human remains are encountered during the course of construction, SDG&E would halt work in the vicinity of the find and would implement the appropriate notification processes as required by law (California Health and Safety Code 7050.5, PRC 5097.98-99, and California Native American Graves Protection and Repatriation Act (NAGPRA)). As a result, potential impacts would be less than significant.

c) Cause a substantial change to Tribal Cultural Resources as defined in Public Resources Code Section 5097.94?

Less than Significant with Mitigation

As part of the agency-to-agency consultation described above in Section 4.5.2.2, the CPUC would contact the NAHC to request additional Sacred Lands Files to identify Tribal Cultural Resources. It is anticipated that the CPUC would then implement mitigation measures as necessary to reduce any impacts to Tribal Cultural Resources to a less than significant level. Therefore, the impact would be less than significant.

Tribal consultation continues throughout all phases of the Project, as necessary. If any Tribal Cultural Resources are identified or revealed within the Proposed Project Modification area, they would be avoided, preserved in place, or handled as determined appropriate during consultation. This may include implementing the proposed MM CUI-1. As a result, any potential impacts would be less than significant.

3.6 GEOLOGY, SOILS, AND MINERAL RESOURCES

3.6.1 Existing Conditions

The existing conditions of the geological systems applicable to the Proposed Project Modification have not changed from what was previously described in Section 4.5.12.1 (pp. 4.5-70 through 4.5-77) of the FEIR.

3.6.2 Potential Impacts

3.6.2.1 Significance Criteria

Section 4.5 of the FEIR provides guidance on assessing whether a project would have significant impacts on the environment. The potential significance of project-related impacts on geology, soils, and minerals was evaluated for the applicable criteria from the FEIR Section 4.5, as discussed in the following sections.

- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault; strong seismic ground-shaking; seismic-related ground failure including liquefaction; or landslides?**
- b) **Would the project result in substantial soil erosion or the loss of topsoil?**
- c) **Would the project be located on a geologic unit of soil that is unstable, or that would become unstable as a result of the project, and expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**
- d) **Would the project be located on expansive soil, as defined in Table 181-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

No Impact

The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on geologic resources as identified in the FEIR.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact

The use of septic tanks and/or alternative wastewater disposal is not included as part of this Proposed Project Modification.

- f) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- g) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

No Impact

The Proposed Project Modification is located within SDG&E easements and franchise agreements, and all access would be via SDG&E easements and franchise rights. These areas are not currently available for mineral resources extraction and the Proposed Project Modification would not result in a change of land use. The Proposed Project Modification would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

3.7 GREENHOUSE GAS EMISSIONS

3.7.1 Existing Conditions

The existing conditions of the air quality systems applicable to the Proposed Project Modification do not differ from what was included in Section 4.14.2 of the FEIR (Section 4.14).

3.7.2 Potential Impacts

3.7.2.1 Significance Criteria

- a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less than Significant

The type of equipment and duration of construction activities associated with the Proposed Project Modification are consistent with those discussed in the FEIR Section 4.14. Construction activities associated with this proposed modification would last approximately two weeks.

The short-term use of this construction equipment would not result in a substantial increase in GHG emissions above those described in the FEIR. Therefore, construction impacts from GHG emissions would remain less than significant.

- b) **Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Less than Significant with Mitigation

The Proposed Project Modification would be consistent with the FEIR Section 4.14, specifically the Climate Change Scoping Plan actions is summarized in Table 4.14-8 (p. 4.14-13) of the FEIR and Executive Orders S-3-05 and 3-30-15 as referenced in FEIR Section 4.14 pg. 4.14-5.

Construction activities associated with the Proposed Project Modification would not result in a new impact or substantially increase the severity of a previously analyzed impact for GHGs as identified in the FEIR. Consistent with the FEIR, MM GHG-1, which requires disposal of organic materials (e.g., vegetation cleared from the site) in a greenwaste recycling program or an alternative to a landfill, would be implemented. Impacts from conflicts with the CARB scoping plan would be less than significant with implementation of MM GHG-1 and APM Air-5.

Consistent with the FEIR, SDG&E would recycle all possible waste generated from construction, including packaging materials and excess conductor. The majority of solid waste that would be disposed of at a landfill is expected to be excess soil and excavated materials, which would not contribute to the production of methane (CH₄).

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3.8 HAZARDS AND HAZARDOUS MATERIALS

3.8.1 Existing Conditions

The existing conditions of hazards and hazardous materials applicable to the Proposed Project Modification have not changed from what was previously described in Section 4.11.12.1 (pp. 4.11-68 through 4.11-70) of the FEIR.

3.8.1.1 Current Land Uses

Current land uses remain the same as the FEIR.

3.8.2 Potential Impacts

3.8.3 Significance Criteria

- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less than Significant with Mitigation

The Proposed Project Modification would include the routine transport, use, and disposal of common hazardous materials such as fuels and lubricants. Although accidental spills would be unlikely, spilled or leaking hazardous materials from construction vehicles and equipment would create a significant hazard to the public or the environment and would be a significant impact. Per the FEIR (see pp 4.11-73 through 4.11-74) MMs Hazards-2 and Hazards-3 would reduce impacts related to spills to less than significant through required implementation of the existing Spill Prevention, Control, and Countermeasure (SPCC) Plan (where applicable) and Hazardous Substance Control and Emergency Response Plan (HSCERP).

- b) **Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less than Significant with Mitigation

The Proposed Project Modification would include the handling and use of common hazardous materials such as fuels and lubricants that were addressed in the FEIR. While the potential for a release of these materials does exist, the chances of a release resulting in a substantial hazard to the public and/or the environment are considered less than significant with the implementation of MMs Hazards-2, Hazards-3, Hazards-4, Utilities-3 (as described in Section 4.11.12.2 at pp. 4.11-74 through 4.11-75)

- c) **Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No Impact

There are no schools within 0.25 mile of the Proposed Project Modification, therefore no impact would occur.

- d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less than Significant

There are no open hazardous materials sites within 0.25 mile of the Proposed Project Modification. Further, excavation activities are limited to guard structure installation. Therefore, the potential to encounter contaminated soil and groundwater is extremely low. Impacts are considered less than significant.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact

There are no public or private airports or airstrips immediately adjacent to the Proposed Project Modification. The nearest private airstrip is the MCAS Miramar airstrip, located approximately one mile east of the Proposed Project Modification. In contrast to the FEIR, the Proposed Project Modification would not require the use of helicopter staging. Therefore, no impact would occur.

- g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than Significant with Mitigation

The Proposed Project Modification would utilize the same types of equipment and hazardous materials and would not interfere with the adopted emergency plan as analyzed in the FEIR and described in the HSCERP. Further, the Proposed Project Modification may result in lane closures on public roads or otherwise affect public services during guard structure installation activities. However, through the implementation of MM Traffic-1, which requires implementation of a Construction Transportation Management Plan (CTMP); MM Traffic-6, which restricts road closures during peak periods and maintains access, would reduce impacts to emergency access; and MM Traffic-8, which requires notification of emergency personnel of road closures, would reduce impacts to emergency access. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to hazards and hazardous materials as identified in the FEIR Section 4.11 pg. 4-11-37. Impacts would be less than significant with mitigation.

h) Would the project have the potential to create a significant hazard to air traffic from installation of new transmission lines and structures?

No Impact

The Proposed Project Modification includes work on an existing transmission line and does not include the installation of a new transmission line. Guard structures would be temporary and would be removed at the end of the two-week construction period. The Proposed Project Modification does not include the installation of any permanent structures.

i) Would the project have the potential to create a significant hazard to the public or the environment through the transport of heavy materials with helicopters?

No Impact

Helicopters would not be used as part of the Proposed Project Modification.

j) Would the project have the potential to expose people to a significant risk of injury or death involving unexploded ordnance during project construction?

Less than Significant Impact with Mitigation

The Proposed Project Modification is partially located within MCAS Miramar, which was historically used for bombing and munitions testing, creating a potential to encounter unexploded ordnance during ground-disturbing activities. However, consistent with MM Hazards-6, all workers would complete the existing Unexploded Ordnance Training prior to working within MCAS Miramar. With the implementation of MM Hazards-6, impacts associated with exposing people to significant risk of injury or death involving unexploded ordnance would be less than significant with mitigation.

k) Would the project have the potential to expose workers or the public to excessive shock hazards?

Less than Significant

No new transmission lines would be electrified during construction. Construction of the Proposed Project Modification would meet or exceed IEEE, ANSI, CPUC G0 95, and GO 128 safety standards, and Cal/ safety regulations; therefore, impacts resulting from excessive shock hazards during construction would be less than significant.

Implementation of standard operating procedures would minimize the exposure of workers and the public to excessive shock hazards from contact with conductive objects. Impacts would be significant if the touch voltage were to exceed safety thresholds. As this Proposed Project Refinement involves only re-tensioning of an existing line, no exceedance of touch voltage safety thresholds is expected and impacts are less than significant.

- l) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

Less than Significant Impact with Mitigation

The Proposed Project Modification would be located within the Peñasquitos Fireshed and within a Very High Fire Hazard Zone. The Proposed Project Modification would involve the use of construction equipment which would have the potential to ignite wildfires. SDG&E would implement APM Fire-1, as well as MM Fire-1, Fire-2 and Fire-3 as described in the FEIR to reduce impacts. Consistent with the FEIR (p. 4.12-40), impacts would be less than significant with mitigation.

3.9 HYDROLOGY AND WATER RESOURCES

3.9.1 Existing Conditions

A wetland specialist conducted a site assessment on August 31, 2017 (Appendix II) of the portion of Rose Creek located within the Proposed Project Modification. The wetland specialist determined that there are waters under the jurisdiction of the California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and RWQCB within the area. The existing conditions of the hydrology and water quality systems applicable to the proposed Project Modification that have changed from what was previously described in the FEIR are summarized below.

Surface Water Bodies and Wetlands

Rose Creek is located within the Proposed Project Modification area. Rose Creek is the primary east-west drainage channel that passes within the Proposed Project Modification Area. Rose Creek flows southwest and drains into Mission Bay and then ultimately flows into the Pacific Ocean. The stream flow of Rose Creek in the area of the Proposed Project Modification is mostly ephemeral, where the stream tends to become active after rainfall.

Rose Creek is listed as a Section 303(d) impaired water body for selenium and toxicity that does not currently meet water quality standards. Pollutant sources are a combination of natural and unknown sources. Pollutant sources for toxicity are unknown point and non-point sources, as well as urban runoff. Section 303(d) of the FCAA requires states to develop Total Maximum Daily Load (TMDLs) for impaired water bodies. TMDLs for Rose Creek are expected by 2021. There are no other water bodies within the Proposed Project Modification area.

The wetland specialist also determined that there are waters under the jurisdiction of CDFW, USACE, and RWQCB within the area. For further details regarding the survey, please refer to Appendix II.

Floodplains

The Proposed Project Modification includes guard structures, which would be located within the 100-year floodplain surrounding Rose Creek; however, guard structures would be temporary and would be removed at the completion of construction.

Potential Impacts

3.9.1.1 Significance Criteria

a) Would the project violate any water quality standards or waste discharge requirements?

Less than Significant with Mitigation

Construction would use mechanized equipment requiring fuels and lubricants. Construction also generates trash and debris. However, as required by MM Hydrology-1 in the FEIR (p. 4.6-61), SDG&E would obtain coverage for the Proposed Project Modification under the Construction General Permit through a COI to the existing SWPPP for the Sycamore - Peñasquitos 230-kV Project. SDG&E would implement BMPs consistent with the SWPPP, as well as the SDG&E Subregional NCCP, which also contains protocols for avoiding and minimizing potential erosion and water quality issues.

Other than the Construction General Permit, no waste discharge requirements apply to construction of the Proposed Project Modification because no discharges other than storm water are anticipated. Additionally, as required by MM Hydrology-2, dust control for water usage would be minimized and would not be applied during or immediately following rain events.

The Proposed Project Modification would not violate water quality standards because SDG&E would comply with the regulatory requirements for protection of water quality outlined above. Impacts to water quality would be less than significant with mitigation.

The Proposed Project Modification only includes minor ground-disturbing activities (no grading) and would not require groundwater pumping. As a result, there would be no impacts to waste discharge requirements.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?

Less than Significant with Mitigation

Minor temporary ground-disturbing activities (i.e., vegetation and brush clearing) would occur; however, no ground water pumping activities would occur. Water for construction purposes (i.e., dust control) would be obtained in accordance with MM Utilities-1 (from reclaimed water sources). For these reasons, there would be no net deficit in aquifer volume or lowering of the groundwater table and no impact on ground water supplies or recharge.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

No Impact

The Proposed Project Modification includes primarily overhead work to the existing 230-kV transmission line and includes only minor short-term ground-disturbing activities. No new impervious surfaces are included within the Proposed Project Modification. Although the Proposed Project Modification includes installation of guard structures within the 100-year floodplain, guard structures would be temporary and removed at the completion of construction. Guard structures would not alter the course of a stream or river. Ground-disturbing activities would not include grading and would be for the installation of guard structures and access to existing pole sites. The majority of the ground-disturbing activities (i.e., vegetation and brush clearing) would occur within and/or adjacent to existing dirt access roads used by SDG&E O&M crews for the existing poles. Ground-disturbing activities would not alter the existing drainage patterns or alter the course of any stream and/or river.

Drainage patterns would not be altered as a result of the Proposed Project Modification and disturbed areas would be restored to their pre-construction conditions. In addition, as noted in Appendix II, if the right-of-entry permit from the railroad requires installation of the of guard structure poles to protect the railroad, the contractor would cross Rose Creek to install GS 23 for work Poles Z479044 and Z479045; however, protection of the railroad using alternative methods, such as a bucket truck, are anticipated to be sufficient. If crossing Rose Creek is needed, steel plates to facilitate vehicle and equipment travel across the creek would be used to prevent any impacts to jurisdictional waters. Therefore, the Proposed Project Modification would not result in the alteration of existing on-site drainage patterns or significantly increase the amount of runoff generated from the site. No net change would occur in the amount of storm water released from the Proposed Project Modification area, which would preclude any off-site soil erosion that may otherwise result. Therefore, there would be no impacts to the existing drainage area resulting in substantial erosion on- or off-site.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

No Impact

As discussed in the response to Question 3.9c, construction-related activities would not result in alterations to the existing drainage patterns. Therefore, no changes would occur to the existing velocity or volume of storm water flows on-site or in off-site areas as a result of the Proposed Project Modification. As such, flow rates and volumes would not be substantially altered and potential impacts from runoff or flooding would not occur.

- e) **Would the project create, or contribute to runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

Less than Significant

The Proposed Project Modification would include the application of water for dust control similar to that described in the FEIR Section 4.6 pg. 4.6-31. Therefore, impacts to a storm water drainage system would be less than significant.

- f) **Would the project otherwise substantially degrade water quality?**

Less than Significant with Mitigation

Construction of the Proposed Project Modification would involve the use of hazardous materials, which could impact water quality in the case of a spill. The direct or indirect discharge of hazardous materials to surface waters would degrade water quality and cause a significant impact. Implementation of MM Hydro-1, APM Hazards-1 (implementation of environmental awareness program), and APM Hazards-2 (implementation of standard operational protocols for the transportation, use, storage, and disposal of hazardous materials) and MM Hazards-2 (requirement that all construction personnel attend environmental awareness training) would reduce impacts from hazardous materials spills. Spill prevention and control measures within the Proposed Project Modification area would be in accordance with the Project SWPPP that was prepared for the Sycamore - Peñasquitos 230-kV Transmission Line Project. Consistent with the FEIR (p. 4.6-33), impacts to water quality associated with hazardous materials would be less than significant with mitigation.

- g) **Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

No Impact

No housing would be constructed as a part of the Proposed Project. Therefore, no housing would be placed within a 100-year flood hazard area.

- h) **Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

Less than Significant

The Proposed Project Modification includes the installation of guard structures; however, the guard structures would be temporary and would be removed upon completion of construction. The area of the Proposed Project Modification located within the 100-year flood hazard area is currently used by SDG&E O&M crews for maintenance of existing facilities and would therefore not introduce a new risk to people from potential flooding beyond existing conditions.

Potential impacts to water flows within the 100-year flood hazard area would be less than significant.

i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than Significant

The Proposed Project Modification is not located in the vicinity of a levee or dam. Guard structures placed within the 100-year flood hazard zone as part of this Proposed Project Modification would be temporary. The area within the flood hazard zone is currently used by SDG&E crews for maintenance of existing poles. Construction workers would only be within the flood risk areas for very short amounts of time and relocation out of flood risk areas is easily attained via existing access roads.

j) Inundation by seiche, tsunami, or mudflow?

Less than Significant

The Proposed Project Modification is not located in a tsunami or seiche inundation area. Guard structures would be temporary and would not be in areas susceptible to mudflows. Ground-disturbing activities would be minor (i.e., vegetation and brush clearing) and would not destabilize the area causing a mudflow. Therefore impact from inundation, tsunami, or mudflow would be less than significant.

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3.10 LAND USE AND PLANNING

3.10.1 Existing Conditions

The existing conditions of the land use applicable to the Proposed Project Modification do not differ from what was included in Section 4.9.12.1 (p. 4.9-36) of the FEIR.

3.10.2 Potential Impacts

3.10.2.1 Significance Criteria

Section 4.9 of the FEIR provides guidance on assessing whether a project would have significant impacts on the environment. The potential significance of project-related impacts on land use and planning were evaluated for the applicable criteria from the FEIR, as discussed in the following sections.

a) Would the project physically divide an established community?

No Impact

The Proposed Project Modification would involve work on an existing electric transmission line within SDG&E ROW. All areas of temporary disturbance would be restored to pre-construction conditions following the completion of the Proposed Project Modification. No above-ground permanent changes to the physical environment would occur as a result of the Proposed Project Modification. Construction of the Proposed Project Modification would not result in the division of any established community. Therefore, no impacts would occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact

The Proposed Project Modification is located within existing SDG&E easements. Construction activities would involve work on the existing transmission line, would not involve the installation of any permanent structures, and would be similar to existing SDG&E O&M activities within the Proposed Project Modification area. As a result, there would be no change in the land use of the existing SDG&E easement area.

Local Plans and Policies

As noted in Section 4.9.12.1 (p. 4.9-36) of the FEIR, local land use plans, policies, and regulations do not apply to the Proposed Project Modification. As such, the underlying general plans and zoning ordinances are not “applicable” and the Proposed Project Modification does not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project Modification. All aspects of the Proposed Project Modification are consistent with the applicable plans, policies, and goals of the City of San Diego General Plan, as

well as the local zoning designations. The Proposed Project Modification would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, and no impacts would occur.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact

SDG&E’s existing NCCP is the conservation plan that is relevant to the Proposed Project Modification area. The NCCP protocols would be applied to the Proposed Project Modification to avoid and/or minimize potential impacts resulting from construction of the Proposed Project, as further described in Section 3.4, Biological Resources. Therefore, the Proposed Project would not conflict with any applicable conservation plan, and no impacts would occur.

3.11 NOISE

3.11.1 Existing Conditions

Noise descriptors used in this analysis remain unchanged from what was used in the FEIR and include A-Weighted Sound Level, Equivalent Sound Level, Maximum Sound Level, and Day/Night Average Sound Level. Further details of these noise descriptors can be found in Section 4.8 of the FEIR (pp. 4.8-1 through 4.8-3).

3.11.1.1 Sensitive Receptors

The sensitive receptors described in Section 4.8.13.1 (p. 4.8-67) and listed in Table 4.8-23 (p. 4.8-68) of the FEIR are applicable to the Proposed Project Modification. Current land uses remain the same as the FEIR, except for Standley Middle School, which is located approximately 1.35 miles west of the Proposed Project Modification.

3.11.2 Potential Impacts

3.11.2.1 Significance Criteria

- a) **Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less than Significant

Construction is anticipated to last approximately two weeks. Construction of the Proposed Project Modification would require the temporary use of various types of noise-generating equipment, including bucket trucks, cranes, a Sag Cat, transmission line trucks, a flatbed trailer, a semi-tractor, framers, and a water truck. Construction activities would typically occur during normal construction hours from Monday through Saturday. SDG&E would meet and confer with the City of San Diego, as needed, regarding activities that would be conducted outside of the hours and/or in excess of the noise standards permitted by the Noise Ordinance.

Construction-related noise levels would be below the applicable thresholds during daytime work and no work outside of normal construction hours is anticipated. If nighttime work is planned to occur or deviation from applicable thresholds is anticipated, SDG&E would meet and confer with the City of San Diego to discuss. However, because noise levels are not anticipated to deviate from the requirements of noise thresholds, and no night and evening work is anticipated, impacts are less than significant.

b) Would the project result in exposure of persons to or generation of excessive ground-borne vibration or groundborne noise levels?

No Impact

The Proposed Project Modification would consist of work on an existing transmission line and would not include ground-disturbing activities that could result in excessive ground-borne noise. As a result, no impacts associated with groundborne vibrations would occur.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact

Because construction of the Proposed Project Modification would be temporary, any increase of ambient noise levels during construction would be temporary; therefore, no permanent increase in noise would occur, and there would be no impact.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant

As discussed previously in the response to Question 3.11a, the construction activities conducted for the Proposed Project Modification would result in less than significant temporary and periodic increases in ambient noise levels. As described previously, the closest sensitive noise receptors to the Proposed Project Modification are residences located approximately 430 ft. west of the Proposed Project Modification alignment. I-805 serves as a major interstate in the area and is located between these sensitive receptors and the Proposed Project Modification. As a result, the periodic increases in ambient noise from construction vehicles, including crew trucks and heavy equipment, would be masked by the significant amount of traffic noise from vehicles that travel along I-805. In addition, SDG&E already performs similar maintenance activities in the Proposed Project area that would not change following construction. The impacts would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant

The nearest public airport is MCAS Miramar, which is located approximately one mile east of the Proposed Project Modification. As stated in the FEIR, construction workers may be exposed to noise generated by aircraft flying over the construction areas, but noise from construction activities would be louder than that from an aircraft. Therefore, the Proposed Project Modification would not expose residents or people working in the Proposed Project Modification

area during construction to excessive noise levels attributable to a public airport. Impacts would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

There is no private airstrip in the vicinity of the Proposed Project Modification. Therefore no impact would occur.

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3.12 PALEONTOLOGICAL RESOURCES

3.12.1 Existing Conditions

The San Diego Natural History Museum (SDNHM) Department of Paleontology prepared a Paleontological Resources Memo in August 2017 for the SDG&E SX-PQ MPR #8 for Poles Z479055 to Z4790404 (hereafter Paleontological Resources Memo) for fossil localities within the Proposed Project Modification area (Appendix III). The literature and records search included a review of all relevant published geological maps and reports, unpublished paleontological reports, and unpublished museum collection locality data within a 0.25-mile radius of the Proposed Project Modification components. A 0.25-mile radius was used for the literature and records search to obtain information on resources that may be directly or indirectly affected by the Proposed Project Modification and to obtain an overview of the types of resources typically found in the Proposed Project Modification area. For more information, see Appendix III. The existing conditions of the geologic formations applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below.

3.12.1.1 Paleontological Setting

As described in the Paleontological Resources Memo (Appendix III), the Proposed Project Modification is primarily located in moderate sensitivity Quaternary (Pleistocene) very old paralic deposits (also referred to as Lindavista Formation), and high sensitivity Eocene Scripps Formation and Stadium Conglomerate (also referred to as the conglomerate tongue of the Friars Formation), with minor areas of low sensitivity later Quaternary (Holocene) alluvium deposits that overlie Scripps Formation. Moderate and high sensitivity deposits are mapped at the surface of guard structure locations GS-19 to GS-21, GS-24, and GS-26 to GS-32, and are likely present at shallow depths beneath the low sensitivity Holocene alluvium at GS-22 and GS-23. The SDNHM reported that there are six localities from the Scripps Formation within a 0.25-mile radius of the Proposed Project Modification area; however, none are within the proposed work areas. The six localities produced fossil leaves and marine invertebrates including snails, clams, crabs, and sea urchins.

3.12.2 Potential Impacts

The Proposed Project Modification would involve limited ground disturbance associated with installation of guard structures. The Paleontological Resources Memo completed in August 2017 identified that excavations would take place within moderate to high potential formations. The Proposed Project Modification has the potential to result in impacts to paleontological resources during direct bury of the guard structure poles.

3.12.2.1 Significance Criteria

- a) **Would the project directly or indirectly, destroy a unique paleontological resource or site or unique geologic feature?**

Less than Significant with Mitigation

The Proposed Project Modification would primarily be located within existing roadways that have been previously disturbed and would be underlain mostly by geological formations with moderate to high sensitivity for paleontological resources. Excavation would be limited to areas of direct bury GS locations. For further details regarding the proposed construction activities, please refer to Section 2.4.1.

A Paleontological Resources Memo (Appendix III) indicated that no previously recorded fossil localities are within the work areas. However, six have been found within a 0.25-mile radius of the temporary work areas. Additionally, the literature review identified that excavations would take place within moderate to high potential formations. The Proposed Project Modification has the potential to result in impacts to paleontological resources during direct bury of the guard structure poles; however, through the implementation of MM Paleontology-1 and MM Paleontology-3 as described in Section 4.4.8 (pp. 4.4-16 and 4.4-17) of the FEIR, impacts to these resources would be less than significant with mitigation. The Proposed Project Modification would not result in new impacts or increase the severity of a previously identified impact on paleontological resources.

3.13 POPULATION AND HOUSING

3.13.1 Existing Conditions

The population and housing conditions described in Section 4.16.2 (p. 4.16-11) of the FEIR would remain unchanged for the Proposed Project Modification.

3.13.2 Potential Impacts

3.13.2.1 Significance Criteria

- a) **Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**
- b) **Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c) **Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact

The Proposed Project Modification is designed to increase reliability and accommodate existing and planned electrical load growth, rather than to induce growth.

The Proposed Project Modification includes work on an existing 230-kV overhead transmission line in an area where housing does not exist. Service interruptions to communities served by the transmission lines would be temporary (only during construction) and minimal. The Proposed Project Modification would not displace people or housing; therefore, no impact would occur.

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3.14 RECREATION

3.14.1 Existing Conditions

The existing conditions of recreational resources applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below.

3.14.1.1 Recreational Setting

The Proposed Project Modification is in the same area as described in Section 4.10 of the FEIR; however, it is not located within a park, preserve, or trail. The majority of the Proposed Project Modification is surrounded by open space within MCAS Miramar, which is not open to the public. The Proposed Project Modification is located approximately 500 ft. west of Rose Canyon Open Space Park. Rose Canyon Open Space Park is located just west of I-805 and is owned by the City of San Diego.

3.14.2 Potential Impacts

3.14.2.1 Significance Criteria

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b) **Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**
- c) **Substantially disrupt activities in a public recreation area?**
- d) **Substantially reduce recreational value of a public recreational resource?**

No Impact

The Proposed Project Modification is not located within a park, public open space, or trail. No impacts would result to a public recreational resource.

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3.15 TRANSPORTATION AND TRAFFIC

3.15.1 Existing Conditions

The existing transportation and traffic conditions applicable to the Proposed Project Modification have not changed from what was previously described in Section 4.7.13.1 (p. 4.7-85) of the FEIR.

3.15.2 Potential Impacts

3.15.2.1 Significance Criteria

- a) **Would the Proposed Project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency, taking into account all modes of transportation?**

Less than Significant with Mitigation

The Proposed Project Modification would not result in a substantial increase in vehicle traffic. Consistent with the analysis provided in the FEIR Section 4.7 pg. 4.7-34, the Proposed Project Modification would implement the existing CTMP as required in MM Traffic-1. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to conflicts with applicable plans and policies as identified in the FEIR. Impacts would be less than significant with mitigation.

- b) **Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less than Significant with Mitigation

Construction workers' daily transportation is not expected to increase congestion on any roads or highways because the Proposed Project Modification-generated traffic would be minimal. The Proposed Project Modification would involve a slight increase in additional construction vehicles (one to two at each work location for the day) and personal vehicles (approximately three to four passenger vehicles in a given location) during proposed construction activities. However, the proposed work is short term (approximately two weeks) and would occur primarily on existing developed private access roads not accessible to the public.

Consistent with the analysis provided in the FEIR, MM Traffic-1, which requires preparation of a CTMP, would be implemented. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to conflicts with applicable plans and policies as identified in the FEIR. Impacts would be less than significant with mitigation.

- c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

No Impact

Helicopter use is not anticipated for the construction of the Proposed Project Modification.

- d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Less than Significant with Mitigation

As part of the Proposed Project Modification, SDG&E and its contractors would utilize existing access roads and pads currently used by SDG&E for O&M activities. Consistent with the analysis provided in Section 4.7.13 of the FEIR, use of these routes and entrance to and exit from the work site by heavy equipment and vehicles would pose a hazard to other vehicles, pedestrians, and bicyclists. The use of heavy equipment on roadways could also result in damage to heavily traveled roads, which would cause a significant hazard to vehicles and bicyclists. Consistent with the FEIR, implementation of MM Traffic-1, which requires implementation of a CTMP and MM Traffic-3 which requires post-construction road repair would reduce impacts from construction vehicle traffic. Additionally, implementation of MM Traffic-7, which requires notification of road closures and establishment of detours, would reduce safety hazards to pedestrians and bicyclists during construction.

Standard traffic control methods would be implemented where stringing occurs across public access roadways and railroads. Further, 14 temporary guard structures would be installed to prevent any dropped conductor from coming into contact with pedestrians, vehicles, or utilities (e.g., distribution lines and communication facilities) located beneath the wire. Guard structures would be temporary and would be removed at the end of the two-week construction period. Implementation of MM Traffic-4, which requires additional assessment of crossing locations and installation of nets or temporary closure of roads during stringing in high-risk areas to reduce potential hazards; and MM Traffic-5 and MM Traffic-6, which would address the impact from temporary closure of roads during conductor stringing, would reduce impacts to vehicle traffic hazards. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to traffic hazards as identified in the FEIR. Impacts would be less than significant with mitigation.

- e) Would the project result in inadequate emergency access?**

Less than Significant with Mitigation

The Proposed Project Modification may result in lane closures on public roads or otherwise affect public services during guard structure installation activities. To ensure that emergency response access is maintained, SDG&E would coordinate with all of the local emergency response agencies during all construction that may involve lane closure within roadways. Consistent with the analysis provided in the FEIR, implementation of MM Traffic-1, which requires implementation of a CTMP, and MM Traffic-6, which restricts road closures off peak

periods and maintains access, would reduce impacts to emergency access; and MM Traffic-8, which requires notification of emergency personnel of road closures, would reduce impacts to emergency access. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to emergency access as identified in the FEIR. Impacts would be less than significant with mitigation.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact

The Proposed Project is located primarily within MCAS Miramar. Construction would occur within SDG&E ROW. The Proposed Project would not involve any activities that would conflict with alternative transportation policies, plans, or programs, including bus transportation in the area.

g) Would the project cause temporary road and lane closures that would temporarily disrupt traffic flow?

Less than Significant with Mitigation

The Proposed Project Modification may result in lane closures on public roads or otherwise affect public services during guard structure installation activities. Temporary closure would cause a significant impact on traffic flow if the closure occurred during peak and daytime traffic hours. Consistent with the analysis provided in the FEIR, implementation of MM Traffic-6, which restricts road closures to off peak hours, and maintains access, would reduce impacts to traffic flow. Impacts would be less than significant with mitigation.

h) Would the project result in inadequate parking capacity?

No Impact

Construction workers and vehicles would park within staging yards and would not take up parking spaces within existing parking lots or result in the loss of street parking. There would be no loss of parking spaces or increase in demand for parking as a result of the Proposed Project Modification.

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3.16 UTILITIES AND PUBLIC SERVICE SYSTEMS

3.16.1 Existing Conditions

3.16.1.1 Regulatory Setting

The existing conditions of the utilities and services systems applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below by resource.

3.16.1.2 Parks

Rose Canyon Open Space is within 1000 ft. (approximately 640 ft. from Z479043) of the Proposed Project Modification and was not included in the FEIR. It is located west of the Proposed Project Modification and I-805. No libraries are located within 1,000 ft. of the Proposed Project Modification. Further details regarding parks are found in Section 4.17 (p. 4.17-14) of the FEIR.

3.16.2 Potential Impacts

The Proposed Project Modification would not involve the construction of new, or expansion of existing, water facilities, stormwater drainage facilities, and/or requirement of water entitlements, or creation of new solid waste disposal needs as analyzed in the FEIR.

3.16.3 Significance Criteria

- a) **Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b) **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- c) **Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- d) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact

The Proposed Project Modification would not involve the generation of wastewater or the construction of new, or expansion of existing, water facilities, wastewater facilities, or stormwater drainage facilities; therefore, no impact would occur.

- e) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

No Impact

The Proposed Project Modification would not require new or expanded water entitlements. Consistent with the FEIR, SDG&E would utilize recycled water or non-potable water for approved construction uses, including dust control. The City of San Diego's Public Utilities Department has confirmed that approximately 25 million gallons of potable and recycled water shall be available for Project use during construction.¹ The Proposed Project Modification would have sufficient water supplies and no impact to existing water entitlements and/or resources would occur.

- f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

Less than Significant

The Proposed Project Modification does not involve the generation of excess soil and excavation materials. Construction of the Proposed Project modification would generate very minimal waste materials such as packaging (e.g., cardboard boxes, plastic wrapping, trash from consumables, etc.) and vegetation. All non-hazardous solid waste would be disposed of at a nearby licensed landfill would. Management and disposal of solid waste would comply with all applicable federal, state, and local statutes and regulations and no impact related to solid waste would occur.

Impacts would remain less than significant and no mitigation would be required.

- h) Would the Proposed Project cause substantial deterioration or damage to gas, water, or sewer pipelines or communications lines?**

No Impact

One gas pipeline is located within the transmission corridor of the Proposed Project Modification. The Proposed Project Modification would include overhead work and may require only minor ground-disturbing activities (i.e., vegetation and brush clearing) for the installation of guard structures. No ground-disturbing activities would occur above buried utility lines; therefore, no impacts to gas, water sewer pipelines, or communication lines are anticipated.

- i.) Would the Proposed Project cause substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or**

¹ Will serve letter received from the City of San Diego on September 30, 2014. Letter was provided to the CPUC on October 14, 2016.

physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?

No Impact

Construction of the Proposed Project Modification is not anticipated to require additional and/or different fire protection or emergency services (fire protection and police protection) from those included in the FEIR. Rose Canyon Open Space, located to the west of the Proposed Project Modification and I-805, would not be affected by the Proposed Project Modification. The majority of the Proposed Project Modification would occur within MCAS Miramar and would not cause a new direct and/or indirect impact to schools and/or parks that was not analyzed in the FEIR.

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4. APPLICANT-PROPOSED AND MEASURES AND MITIGATION MEASURES

The Proposed Project Modification would implement Project APMs and MMs outlined in the FEIR. No new potentially significant impacts related to the resources analyzed are anticipated; therefore, no new APMs are proposed and no new MMs appear warranted.

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5. SUMMARY OF IMPACTS

As described herein, no new significant impacts would occur as a result of the Proposed Project Modification. As a result, no new Mitigation Measures (MMs) and/or Applicant Proposed Measures (APMs) are proposed. The Proposed Project Modification would implement existing MMs and APMs as applicable. Impacts resulting from operation and maintenance (O&M) activities are not analyzed in this Assessment, as the Proposed Project Modification includes work on an existing transmission line and no new permanent facilities would be installed as a result of the work. Table 5-1 below provides a summary of impacts by resource area.

Table 5-1: Summary of Impacts Table

Resource Area	Level of Significance	Applicable Mitigation Measures from FEIR
Aesthetics	Less than Significant	
Agriculture and Forestry Resources	No Impact	
Air Quality	Significant and Unavoidable	MM Air-1, MM Air-3, MM Air-4, APM AIR-1, APM AIR-2,
Biological Resources	Less than significant with mitigation	APM AIR-1, APM HYDRO-2, APM HAZ-1, APM HAZ-2, MM Biology-1a through 1d, MM Biology-3, MM Biology-6, MM Biology-7, APM BIO-2
Cultural Resources	Less than Significant with Mitigation	APM CUL-1, APM Cul-2, MM Cul-1, MM CUL-2, MM CUL-3, MM CUL- 4
Geology, Soils, and mineral resources	No Impact	
Greenhouse Gas Emissions	Less than Significant with Mitigation	MM GHG-1, APM Air-5
Hazards and Hazardous Materials	Less than Significant with Mitigation	MM Fire-1, MM Fire-2, MM Fire-3, APM Fire-1, MM Hazards-1, MM Hazards-2, Hazards-3, MM Hazards-4, MM Hazards-6, MM Traffic-1, MM Traffic-6, MM Traffic-8, Utilities-3
Hydrology and Water Resources	Less than Significant with Mitigation	MM Hydrology-1, MM Hydrology-2, MM Utilities-1, MM Hydrology-1, MM Hazards-2, APM Hazards-1, APM Hazards-2
Land Use and Planning	No Impact	
Noise	Less Than Significant	
Paleontological Resources	Less than Significant with Mitigation	MM Paleontology-1, MM Paleontology-3
Population and Housing	No Impact	
Recreation	No Impact	
Transportation and Traffic	Less than Significant with Mitigation	MM Traffic-1, MM Traffic-3, MM Traffic-4, MM Traffic-5, MM Traffic-6, MM Traffic-7
Utilities and Public Service Systems	Less than Significant	

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6. REFERENCES

- ASM Affiliates, Inc. 2011. Integrated Cultural Resources Management Plan Update for Marine Corps Air Station Miramar. On file at Naval Facilities Engineering Command, Southwest.
- Ballester, Daniel and Teresa Woodard. 2002. Site update form of P-37-024739. On file at the South Central Coastal Information Center.
- Daly, Pamela. 2015. Historic Resource Technical Report for the Chollas Creek Multi-use Path to Bayshore Bikeway Project, San Diego, California.
- Farmland Mapping and Monitoring Program, San Diego County Important.
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APPENDIX I

CULTURAL RESOURCES SURVEY REPORT



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September 06, 2017

Rachel Ruston
SDG&E Environmental Project Management
1010 Tavern Road,
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Subject: Letter Report: Minor Project Refinement 8, Sycamore to Peñasquitos 230-kV Transmission Line, San Diego, California.

Dear Ms. Ruston:

This letter report prepared by AECOM documents the cultural resources survey investigation for Minor Project Refinement Number 8 (MPR 8) for San Diego Gas & Electric (SDG&E)'s Sycamore to Peñasquitos 230-kV Transmission Line Project (SX-PQ). The proposed MPR 8 consists of 16 poles (Z479055 to Z479040) and 14 guard structure locations (GS19 to GS32) that extend approximately two miles south of the current SX-PQ project. The proposed MPR 8 is located near the community of Sorrento Valley and on Marine Corps Air Station (MCAS) Miramar in the City of San Diego, California. In compliance with the requirements of Section 106 of the National Historic Preservation Act and the California Environmental Quality Act, AECOM conducted a cultural resources desktop review and survey for the proposed addition to the SX-PQ project. Only Z479053, Z479054, Z479055, GS23, GS31, and GS32 were intensively surveyed during the current project.

Two cultural resources (CA-SDI-10250 and P-37-024739) were updated during the survey effort and one new isolate was recorded (SXPQ-I-2). It is recommended that an Environmentally Sensitive Area (ESA) boundary should be erected to preserve resource CA-SDI-10250, while resource P-37-024739 shall be avoided. The isolate is located outside of the current proposed work area and will not be affected. In accordance with Mitigation Measure (MM) Cultural Resources-1, monitoring by an archaeological monitor and a Native American monitor is recommended if any ground disturbance is required during the proposed project at GS22, GS23, GS24, and GS25 and for initial set up at Z479053. If during monitoring, the AECOM Lead Cultural Resources Specialist determines a subsurface deposit is absent or unlikely, monitoring may cease.

Project Description

Under this proposed refinement, SDG&E seeks to add additional work locations at 16 poles and 14 guard structures (Attachment 1), extending approximately 2-miles south of the current project. The proposed work includes re-tensioning an existing line and installing temporary guard structures. While the re-tensioning activity requires only overhead work, the guard structures may include ground disturbing activities. Guard structures will be accomplished using one of four means:

- 1) Bucket truck staged under transmission line: a bucket truck will be staged under the transmission line to guard resources.

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- 2) Two poles on either side of the transmission line, direct buried into the ground: a two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2-3 feet in diameter and 6-8 feet deep. Poles will be installed and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.
- 3) Flower pot staged under the transmission line; a flower pot consists of an approximate 5 feet by 5 feet by 4 feet concrete base that holds up a temporary pole. The flower pot sits on level ground surface and no ground disturbance is needed for this type of installation.
- 4) Protective material installed on distribution lines: a bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

All construction equipment and supplies would remain within the proposed delineated work areas. Access to the work areas will be obtained through existing access roads.

Project Personnel

Shannon E. Foglia, M.A., RPA, served as principal investigator. The survey effort was conducted by Kyle Ports, M.A. RPA and Allana Griffin, B.A. from AECOM. Justin Linton from Redtail Monitoring and Research, Inc. (Red Tail) served as the Native American Monitor during the survey. This letter report was completed by Mr. Ports and Ms. Foglia.

Archival Research

Prior to the cultural resources monitoring by AECOM, SDG&E performed a search of the records on file at the South Coastal Information Center (SCIC) in January of 2017, provided to SDG&E under contract, and shared the results with AECOM. A supplemental records search was performed by SDG&E for previously recorded sites and previous survey reports within a 0.25-mile buffer of the proposed components in August 2017 because the proposed MPR 8 work areas are located outside of the original search area. The records search revealed that two cultural resources, CA-SDI-10250/P-37-010250 (prehistoric lithic scatter) and CA-SDI-11789/P-37-011789 (prehistoric lithic scatter), have been previously identified within 100 feet of the proposed MPR 8 work areas. Both will be avoided during construction.

MCAS Miramar is considered 100 percent inventoried and a further cultural resource survey of MCAS property is not needed. A desktop review of resources within the vicinity of MPR 8 work locations was performed. The desktop review occurred for Z479040 through Z479055, GS19 through GS22, and GS24 through GS30.

Field Survey and Results

An intensive pedestrian survey of the MPR 8 work locations on private land was conducted on August 17, 2017 by Kyle Ports, M.A., RPA, Allana Griffin, B.A. from AECOM, and Justin Linton from Redtail. The

survey was performed by surveying a 98 feet radius surrounding three of the poles, Z479053, Z479054, and Z479055, in order to identify any surface cultural resources. On August 25, 2017, a field visit was conducted by Shannon E. Foglia, M.A., RPA with SDG&E, AECOM, and Wilson, the construction contractor, to verify the work locations and survey the additional guard structures as needed. Only GS23, GS31, and GS32 were surveyed.

Of the 16 poles, 13 were located on MCAS Miramar property and were previously surveyed. Of the 14 guard structures three were located outside MCAS Miramar property and on heavily disturbed land. Access to poles and guard structures will be using existing access roads or overland travel; no new roads are planned for this project. During the survey one new resource was observed and two resources were updated. Table 1 presents the field survey results and recommendations during construction.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479040	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479041	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479042	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479043	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479044	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479045	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479046	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479047	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479048	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479049	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479050	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479051	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479052	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479053	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; positive.	Avoid resource; establish ESA at CA-SDI-10250. A qualified archaeologist and Native American monitor should monitor the initial use and set up of the work area.
Z479054	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
Z479055	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
GS19	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS20	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS21	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS22	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS23	Install guard structure	Dirt access road of Frost-March Place	Surveyed; positive.	Avoid P-37-024739; monitor. Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
GS24	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS25	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS26	Install guard structure	Nobel Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS27	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS28	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS29	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS30	Install guard structure	Dirt access road off Eastgate Mall	On MCAS Miramar; not surveyed. None.	None; low potential.
GS31	Install guard structure	Eastgate Mall	Surveyed; none.	None; low potential.
GS32	Install guard structure	Dirt access road off Eastgate Mall	Surveyed; none.	None; low potential.

CA-SDI-10250 (P-37-010250)

This resource consists of a prehistoric temporary camp with a lithic scatter that was first recorded by RBR & Associates in 1985 (Robbins Wade 1985). RBR & Associates also conducted test units and surface scrapes. The site comprises of a shallow subsurface deposit with manos, scrapers, choppers, and bifacial knives (Perry and Tift 1985). In 1995, Gallegos & Associates expanded the site boundaries after recording flakes and stone tools west of the original site. ASM Affiliates returned to the site in 2002 to perform a subsurface testing program at the site. They recommended the site as not significant (Palette 2002); based on this result, the site is not eligible for listing on the California Register of Historic Resources (CRHR). July Roy from AECOM visited the site in 2015 and did not relocate any artifacts within the portion of the site surveyed.

During the current survey, two prehistoric artifacts were recorded just west of the site boundary. The assemblage consisted of a lithic tool and one mano. These artifacts are likely no longer in situ based on the location of the finds. The current site boundary will be extended to include the new artifacts recorded.

P-37-024739

This resource is comprised of a newly documented segment of the Atchison, Topeka and Santa Fe (AT&SF) Railroad. The railroad has been recorded under P-37-024739 elsewhere in the county. P-37-024739 was originally recorded in 2002 by CRM Tech (Ballester and Woodard 2002). It consists of the AT&SF Railroad, originally called the California Southern Railroad that was first constructed in 1880-1888. The AT&SF Railroad played a role in the development of San Diego County from 1880-1920. The resource was previously determined eligible for the National Register of Historic Resources in 1998, as well as recommended eligible for the CRHR and the City of San Diego's Register of Historic Resources (Daly 2015). The current segment was identified during desktop review. The project will avoid impacts to the railroad.

SXPQ-I-2

This prehistoric isolate consists of a mano located approximately 15-meters southwest of an existing pole. The isolate was discovered amongst a small pile of broken cobbles on the shoulder of an access road. The vegetation consisted of small shrubs, and tall weeds. The isolate is located just outside the work area boundary and will not be impacted.

Cultural Resources Results and Recommendations

Based on the archival research conducted by SDG&E and the pedestrian survey conducted by AECOM, one cultural resource (SXPQ-I-2) was recorded and two sites (CA-SDI-10250 and P-37-024739) were updated during the current survey. The isolate is not eligible for the CRHR. The isolate is located outside of the current proposed work area and will not be impacted. CA-SDI-10250 has been subject to archaeological testing and was previously recommended as not eligible for the CRHR. The site will be avoided during construction. An ESA will be established at the site prior to work beginning. Resource P-37-024739 is a segment of an NRHP eligible railroad and it shall be avoided during construction activities. An ESA is not recommended at this location due to the fact that it is an active railroad. All resources will be recorded or updated on the appropriate Department of Parks and Recreation 523 forms and submitted to the SCIC at the completion of the project.

The current project area was not previously analyzed by the environmental impact report and it is not currently mapped for sensitivity of buried cultural resources. The CPUC Qualified Archaeologist reviewed each work location with proposed ground disturbance and its potential to impact buried resources. Most of the guard structures are along well developed roads. Excavation will likely be within fill material with a low potential for buried resources. Based upon previous analysis for potential for buried deposits, monitoring by a qualified archaeologist and Native American monitor was recommended at four guard structure locations (GS22, GS23, GS24, and GS25) that were near waterways or pre-existing resources. Additionally, initial work at Z479053 should be monitored and an ESA established at the work location. No further cultural resources work is recommended at the remaining 25 locations where pedestrian survey and previous surveys have indicated that it is unlikely that subsurface cultural resources are present in the area proposed for activity or where only overhead work will occur.

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In the event that cultural resources are encountered during overhead activities, work in the immediate vicinity will be suspended within 50 feet of the find until the discovery is assessed by a qualified archaeologist, SDG&E archaeologists are contacted, and treatment is determined. Although there is no evidence to suggest the presence of human remains, in the unlikely event that human remains are encountered during overhead activities, all work will cease within 50 feet and the county coroner will be contacted, per the California Public Resources Code. MM-Cultural Resources-4 will be followed. A copy of this letter report will be sent to the SCIC.

Yours sincerely,



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cc: Jennifer Kaminsky (SDG&E), Edith Moreno (SDG&E), Michelle Fehrensén (AECOM), Chelsea Ohanesian (AECOM), and J. Lennox (SCIC)

References:

- ASM Affiliates, Inc.
2002 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Ballester, Daniel and Teresa Woodard
2002 Site update form of P-37-024739. On file at the South Central Coastal Information Center.
- Daly, Pamela
2015 Historic Resource Technical Report for the Chollas Creek Multi-use Path to Bayshore Bikeway Project, San Diego, California.
- Perry, J. and L. Tift
1996 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Robbins Wade, Mary
1985 Site form of CA-SDI-10250. On file at the South Central Coastal Information Center.

Attachments:



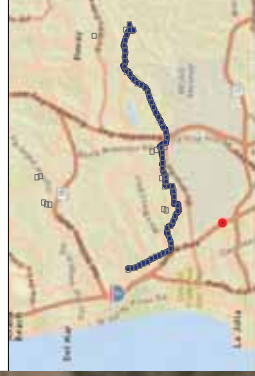
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Page 8

MPR 8 Temporary Work Areas



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



30 15 0 30 Feet
1:360 1 inch = 30 feet

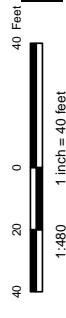
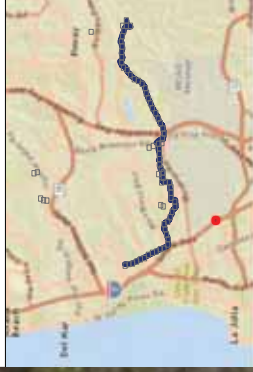
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479040**





Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



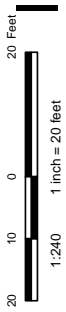
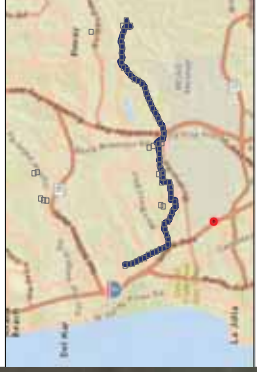
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479041**

9/1/2017



Legend

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- - - Access Road
- Temporary Work Area



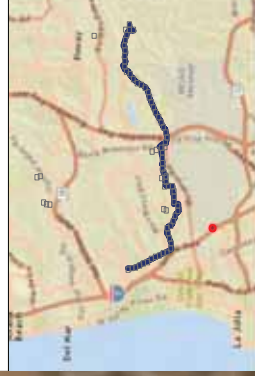
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479042**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



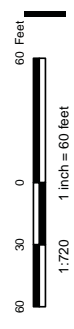
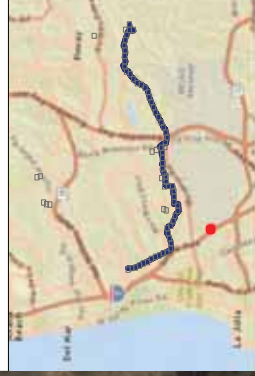
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479043**

9/1/2017



Legend

- (MPR 8 Poles
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- Temporary Work Area
- Guard Structure



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479044**

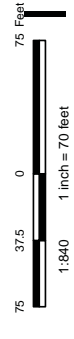
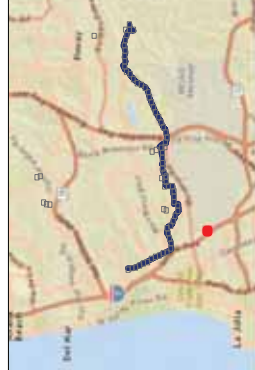
9/1/2017



Marine Corps Air Station

Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



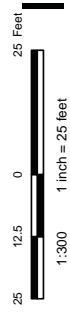
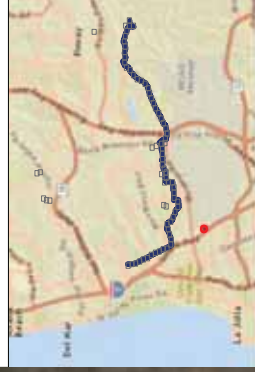
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479045**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area

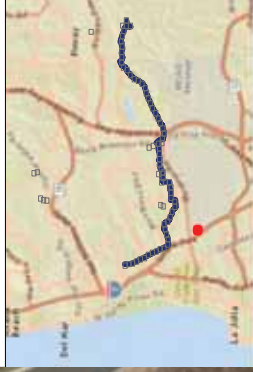


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479046**



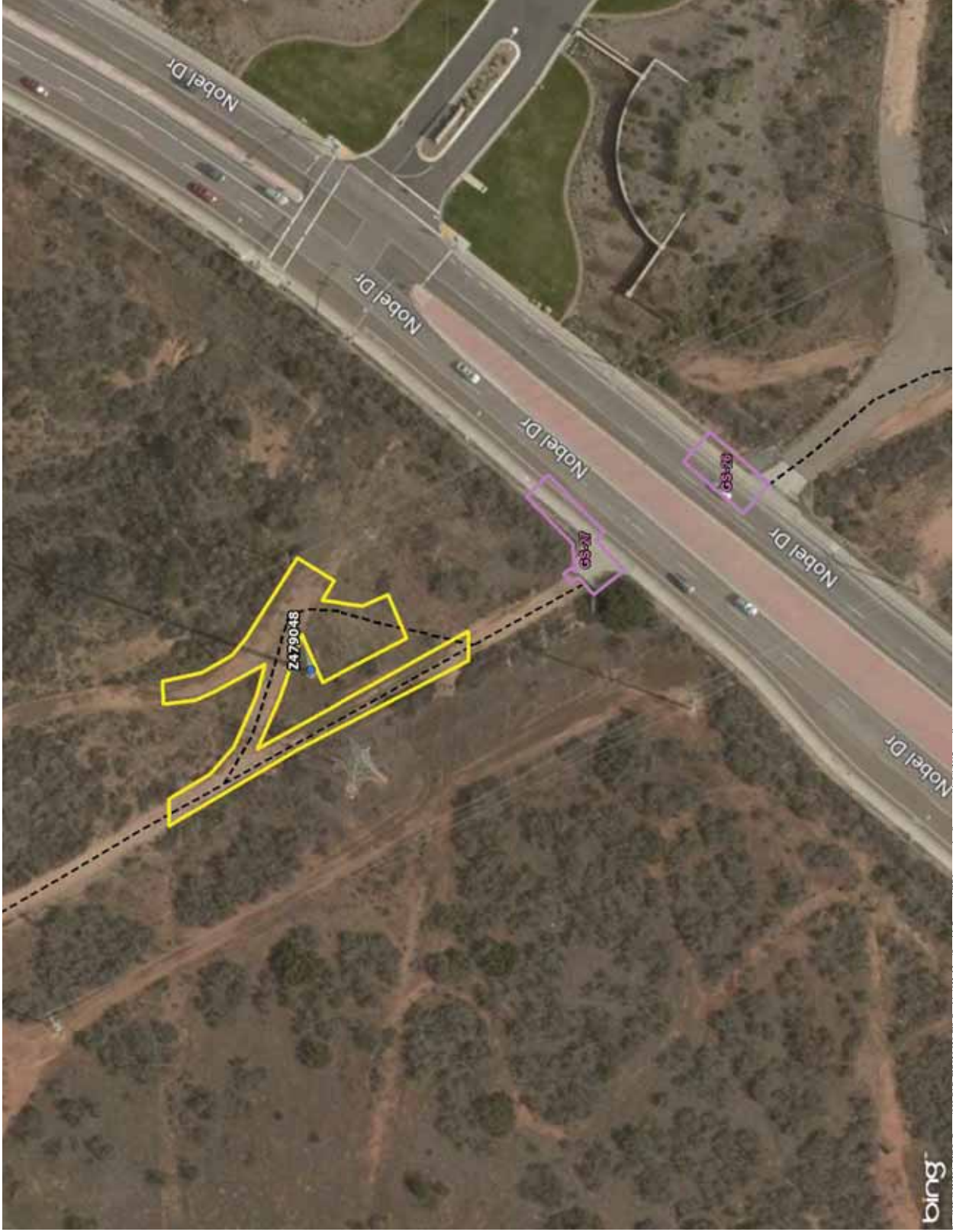
Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



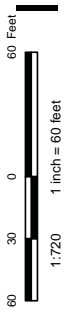
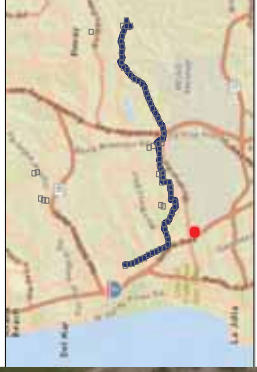
60 Feet
0 30 60
1:720 1 inch = 60 feet

**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479047**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure

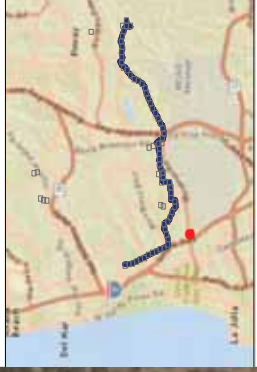


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479048**

9/1/2017



- Legend**
- (MPR 8 Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure



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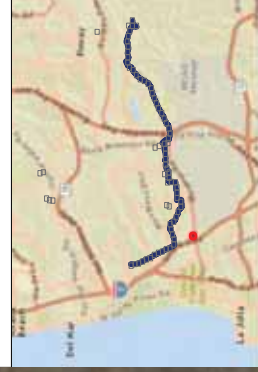
**Sycamore to Peñasquitos
 230kV Transmission Line Project
 Proposed Refinement Area - MPR 8
 Z479049**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



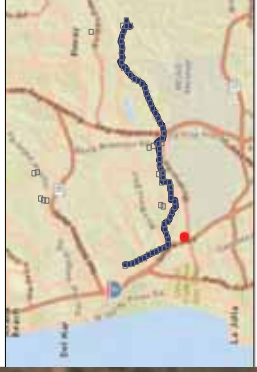
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479050**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



1:480
1 inch = 40 feet
40 0 40 Feet

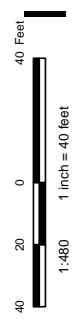
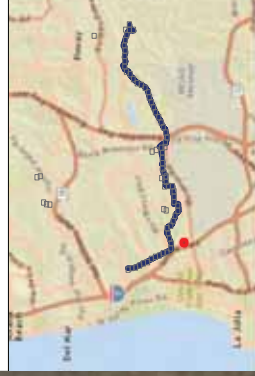
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479051**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



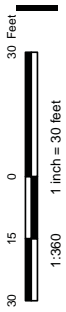
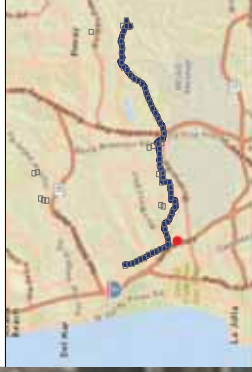
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479052**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



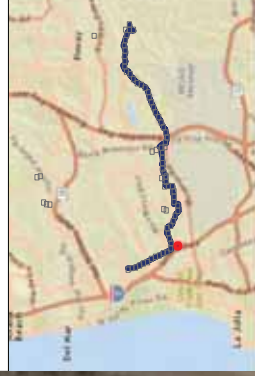
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479053**

9/1/2017



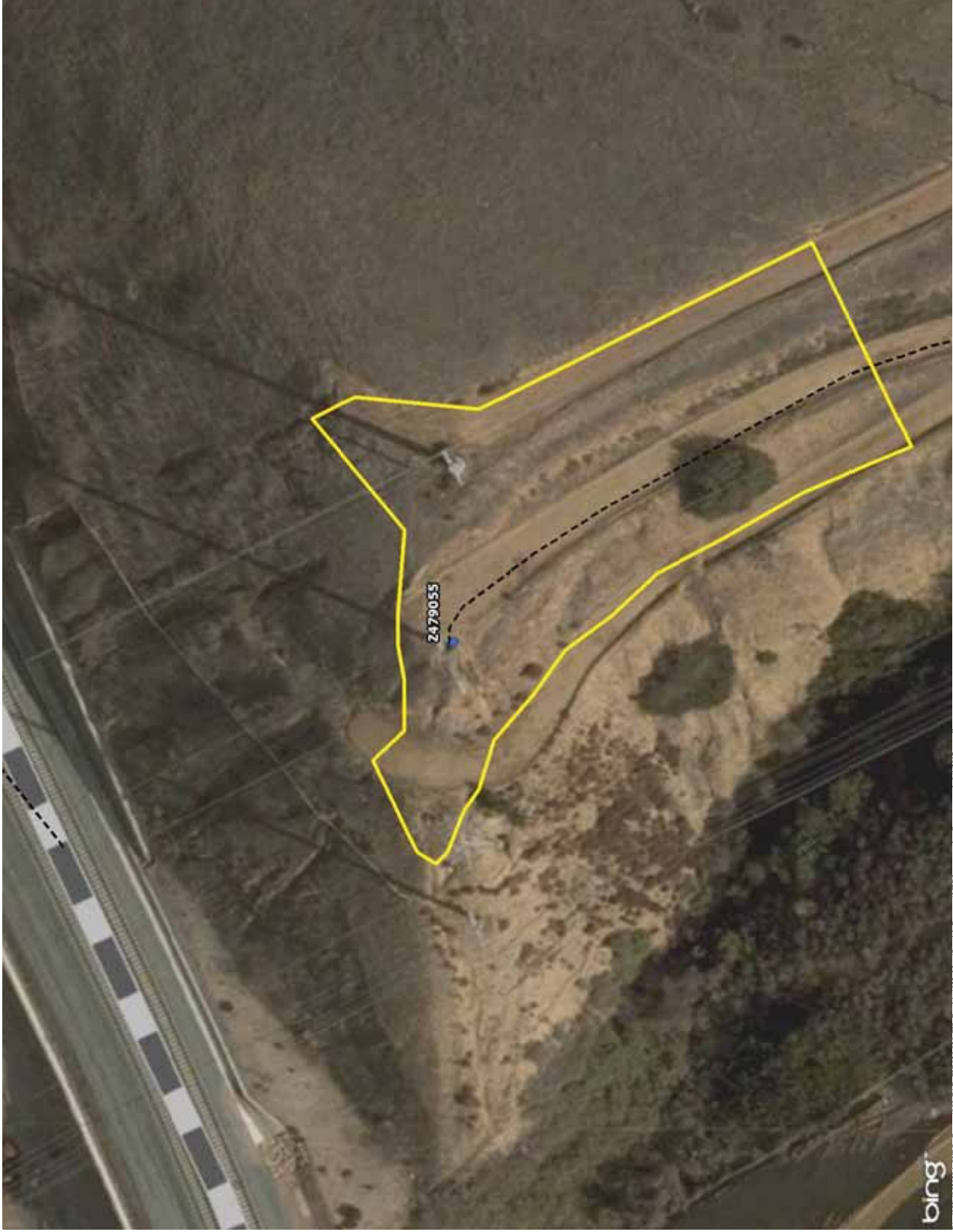
Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



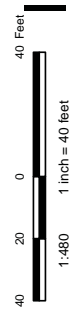
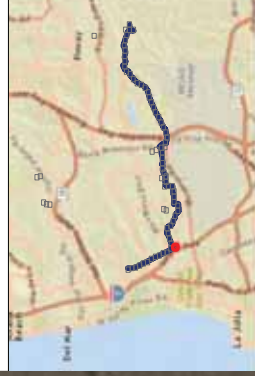
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1:480
1 inch = 40 feet

**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479054**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479055**

9/1/2017



APPENDIX II

JURISDICTIONAL IMPACT SITE ASSESSMENT

Memorandum

To	Jennifer Kaminsky, San Diego Gas and Electric (SDG&E)	Page	1
CC			
Subject	Rose Creek Stream Crossing Jurisdictional Impact Site Assessment for the SDG&E Sycamore-Peñasquitos Transmission Project (Project)		
From	Michelle Fehrensen, AECOM		
CC	Chelsea Ohanesian, AECOM		
Date	September 14, 2017 (Revised on August 1, 2018)		

The Proposed Project Modification for the Sycamore-Peñasquitos 230 Kilovolt (kV) Transmission Line Project (Project) consists of adding temporary work area around 16 poles (Z479040 through Z479055) and 14 guard structures (GS 19 through GS 32) south of Carroll Canyon Road and east of Interstate 805 (I-805). If the Right-of-Entry permit from the San Diego Metropolitan Transit Development Board to access GS 23 requires installation of the guard structures to protect the railroad, the contractor would cross Rose Creek to install GS 23 for work on Poles Z479044 and Z479045. However, protection of the railroad using alternative methods, such as a bucket truck, are anticipated to be sufficient.

The existing road that goes through the Rose Creek drainage has been eroded away over time making it difficult to cross the creek without damaging the banks of the drainage. If crossing Rose Creek is needed, and to facilitate vehicle and equipment travel through the drainage, the contractor proposes to install large metal plates with cribbing material that could support the weight of work vehicles across the creek bed.

On August 30, 2017 a wildlife biologist, Ron Walker, conducted a site visit with the contractor to mark the contractor's proposed location of the metal plates. On August 31, 2017 a wetland specialist, Sundeep Amin, conducted a site assessment of the proposed location of the metal plates to confirm they would be placed outside the limits of waters under the jurisdiction of the California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB). The wetland specialist conducted a follow-up site visit of the crossing location on September 12, 2017 to memorialize the proposed location of the metal plates. During the site visit, the wetland specialist used a global positioning system (GPS) to map jurisdictional limits, as well as the coordinates of the corners of the proposed steel plates as marked in the field (Attachment A¹). The wetland specialist also marked the locations of the corners of the metal plates with pin flags (Attachment B). The pin flags clearly delineate that the plates, and any

¹ The aerial used in Attachment B is from 2016 and was the most recent aerial available which may not reflect the conditions currently onsite. Representative photographs are included in Attachment A.

support blocking, would be placed outside the jurisdictional areas. The use of steel plates to facilitate vehicle and equipment travel over Rose Creek is not expected to impact potential jurisdictional waters.

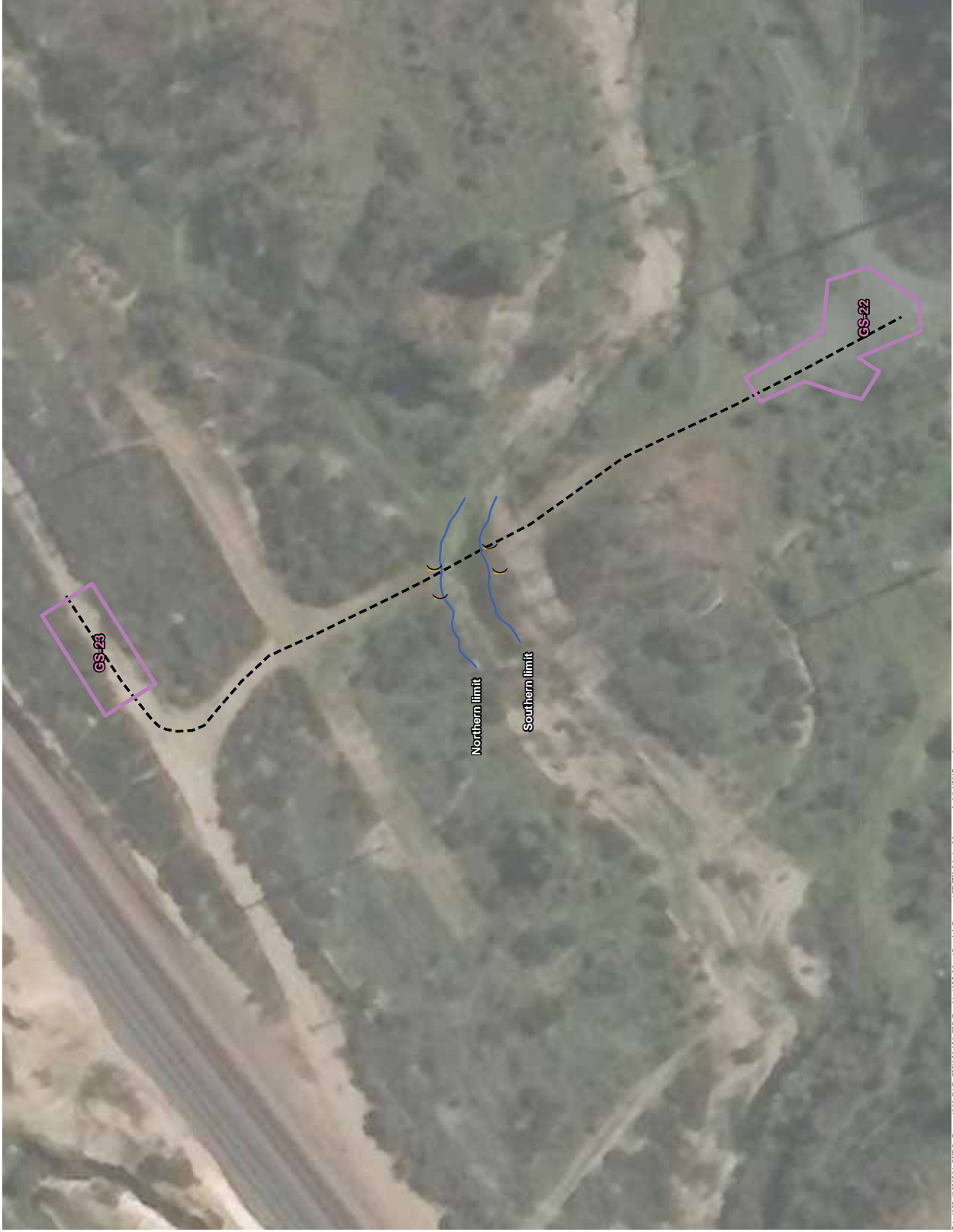
Species in the immediate vicinity of the proposed Rose Creek crossing include, western ragweed (*Ambrosia psilostachya*), rabbit's foot grass (*Polypogon monspeliensis*), umbrella sedge (*Cyperus eragrostis*), unknown sedge (*Cyperus* sp.), unknown eleocharis (*Eleocharis* sp.), unknown mustard (*Brassica* sp.), sow-thistle (*Sonchus oleraceus*), spotted spurge (*Chamaesyce maculata*), and cocklebur (*Xanthium strumarium*). Surrounding vegetation consisted of a mix of Diegan coastal sage scrub on the surrounding hills with patches of sycamores (*Platanus racemosa*) and poison oak (*Toxicodendron diversilobum*) closer to the drainage itself.

Attachments:

Attachment A – CDFW Limits Map

Attachment B – Site Photographs

ATTACHMENT A: CDFW LIMITS MAP



- Legend**
- () Corners of Steel Crossing Plate
 - CDFW Limits
 - Guard Structure
 - - - Access Road



Figure 1
Sycamore to Peñasquitos
CDFW Limits Map
Rose Creek Stream Crossing Memo
9/14/2017

ATTACHMENT B
SITE PHOTOGRAPHS

Attachment B: Site Photographs
SX-PQ Rose Creek Steam Crossing Site Assessment



Photo 1. Photo (facing north) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.



Photo 2. Photo (facing east) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.

APPENDIX III

PALEONTOLOGICAL RESOURCES MEMO



September 6, 2017

Kyle Ports, M.A., RPA
Archaeologist
AECOM
401 West A Street, Suite 1200
San Diego, CA 92101

RE: Paleontological Resources Memo for the SDG&E SX-PQ Minor Project Refinement 8 for Poles Z479055 to Z4790404

Dear Mr. Ports:

This paleontological memorandum evaluates the potential impacts on paleontological resources associated with Minor Project Refinement (MPR) 8 for the San Diego Gas and Electric (SDG&E) Sycamore to Peñasquitos (SX-PQ) 230 kV Transmission Line Project. The MPR is located between poles Z479055 and Z4790404, and extends approximately two miles south of the current SX-PQ project. It includes proposed temporary work areas to access 16 existing poles for wire re-tensioning and installation of 14 guard structure (GS) locations south of CC MM CP, use of existing access roads, and existing pads for pulling sites. Installation of guard structures at 14 work locations will use a combination of direct bury and bucket trucks. Ground disturbing activities are expected to be limited to the installation of direct bury guard structures, which will require auger holes that are 2-3 feet wide and 6-8 feet deep. The remainder of the proposed work activities are not anticipated to require ground disturbance. The paleontological analysis consisted of a review of geologic mapping by Kennedy and Tan, 2008, and a paleontological records search of the MPR alignment and 1/4-mile buffer at the San Diego Natural History Museum (SDNHM) (McComas 2017; Attachment A).

MPR 8 is primarily located in moderate sensitivity Quaternary (Pleistocene) very old paralic deposits (also referred to as Lindavista Formation), and high sensitivity Eocene Scripps Formation and Stadium Conglomerate (also referred to as the conglomerate tongue of the Friars Formation), with minor areas of low sensitivity later Quaternary (Holocene) alluvium deposits that overlie Scripps Formation (McComas, 2017; Kennedy and Tan, 2008). Moderate and high sensitivity deposits are mapped at the surface of guard structure locations GS-19 to GS-21, GS-24, and GS-26 to GS-32, and are likely present at shallow depths beneath the low sensitivity Holocene alluvium at GS-22 and GS-23. All of the geologic units within MPR 8 occur elsewhere in the SX-PQ alignment, and are described in detail in the project's Draft Environmental Impact Report (Panorama Environmental, Inc., 2015). The SDNHM reported that there six localities from the Scripps Formation within a 1/4-mile radius of the MPR 8 alignment (McComas, 2017); however none are within the proposed work areas. The six localities produced fossil leaves and marine invertebrates including snails, clams, crabs, and sea urchins (McComas, 2017).

Based on the results of the analysis, MPR 8 has the potential to result in impacts to paleontological resources during direct bury guard structure excavation into native sediments at all of the 14 proposed locations. The

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remainder of the work proposed by MPR 8 is not anticipated to result in impacts to paleontological resources since 1.) the proposed work locations are on developed/previously disturbed areas, 2.) there is no new ground disturbance associated with re-tensioning the lines or guard structures using bucket trucks, and 3.) there are no known fossil localities within the proposed work areas. Monitoring and fossil recovery will be implemented in accordance with Mitigation Measures Paleontology-1 through 3 during ground disturbance related to installation of direct bury guard structures, and in the event that unanticipated fossils are encountered.

If you have any questions concerning the results for this study, please contact me at crichards@paleosolutions.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Courtney Richards'.

Courtney Richards, M.S.
Principal Paleontologist
Paleo Solutions, Inc.

REFERENCES

- Kennedy, M.P. and S.S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, scale 1:100,000.
- Panorama Environmental, Inc. 2015. Sycamore-Penasquitos 230-kV Transmission Line Project Draft Environmental Impact Report. State Clearinghouse No. 2014081031. Dated September 2015.
- McComas. K. 2017. Paleontological Records Search – SX-PQ Project. Paleontological records search conducted by the San Diego Natural History Museum. Letter results dated 15 August 2017.



ATTACHMENT A: SDNHM Record Search Results



SAN DIEGO NATURAL HISTORY MUSEUM
BALBOA PARK - SAN DIEGO SOCIETY OF NATURAL HISTORY - ESTABLISHED 1874

15 August 2017

Ms. Barbara Webster
Paleo Solutions
911 S. Primrose Avenue, Unit N
Monrovia, CA 91016

RE: Paleontological Records Search – SX-PQ Project

Dear Ms. Webster:

This letter presents the results of a paleontological records search conducted for the SX-PQ project, located in the southern portion of the Sorrento Valley neighborhood and western portion of MCAS Miramar within of the City of San Diego, San Diego County, CA. The project alignment lies east of Interstate 805, and extends southeast from just south of Carroll Canyon Road to south of Governor Drive.

A review of published geological maps covering the project alignment and surrounding area was conducted to determine the specific geologic units underlying the project. Each geologic unit was subsequently assigned a paleontological resource sensitivity following City of San Diego and County of San Diego guidelines (City of San Diego, 2011; Deméré and Walsh, 1993; Stephenson et al., 2009). Published geological reports (e.g., Kennedy and Peterson, 1975; Kennedy and Tan, 2008) covering the project alignment indicate that the proposed project has the potential to impact four geologic units: Holocene-age alluvial flood plain deposits, the early to middle Pleistocene-age Lindavista Formation, and the middle Eocene-age Stadium Conglomerate and Scripps Formation. However, deposits mapped as the Stadium Conglomerate that lie north of State Route 52 were referred to the conglomerate tongue of the Friars Formation by Walsh (1996) and Walsh et al. (1996). Therefore, the conglomerate tongue of the Friars Formation is assumed to underlie the project alignment in areas mapped as the Stadium Conglomerate. All of the geologic units underlying the project alignment and their paleontological sensitivities are summarized in detail in the following section.

In addition, a search of the paleontological collection records housed at the San Diego Natural History Museum (SDNHM) was conducted in order to determine if any documented fossil collection localities occur along the project alignment or within the immediate surrounding area (Figure 1). The SDNHM has six recorded fossil localities within a quarter mile of the project alignment, all from the Scripps Formation (Appendix). These localities are described in greater detail below.

Geologic Rock Units Underlying the Project Alignment

Holocene alluvial flood plain deposits – Holocene alluvial flood plain deposits (mapped by Kennedy and Tan, 2008, as Qya) underlie the alignment where it crosses Rose Canyon. The SDNHM does not have any fossil collection localities from Holocene alluvial flood plain deposits within a quarter-mile radius of the project alignment. These deposits are generally considered to be less than 10,000 years old and are assigned a low paleontological sensitivity based on their young geologic age and the lack of known fossil localities. However, these surficial deposits likely overlie strata of the Scripps Formation (see below), which could be impacted when excavation depths exceed approximately 5–10 feet below surface grade.

Lindavista Formation – The marine and/or non-marine terrace deposits of the early to middle Pleistocene-age (approximately 1.5 to 0.5 million years old) Lindavista Formation underlie the majority of the project alignment as it crosses the mesas at higher elevations. More specifically, these deposits rest on the Linda Vista terrace (approximately 855,000 years old) of Kern and Rockwell (1992), and are equivalent to Unit



9, very old paralic deposits, of Kennedy and Tan (2008). The SDNHM does not have any fossil collection localities from these deposits within a quarter-mile radius of the project alignment. Fossils have primarily been recovered from localities in Tierrasanta and Mira Mesa where the Lindavista Formation is assigned a high paleontological sensitivity; elsewhere in San Diego County, including along the project alignment, the Lindavista Formation is assigned a moderate paleontological sensitivity.

Friars Formation (mapped as Stadium Conglomerate) – The fluvial deposits of the middle Eocene-age (approximately 47 to 46 million years old) Friars Formation (mapped by Kennedy and Tan, 2008, as the Stadium Conglomerate) underlie several short segments of the project alignment along the upper margins of Rose Canyon. The SDNHM does not have any fossil collection localities from the Friars Formation within a quarter-mile radius of the project alignment. Elsewhere in San Diego County, the Friars Formation has produced vertebrate fossils, including terrestrial mammals (e.g., opossums, insectivores, primates, rodents, artiodactyls, and perissodactyls; Walsh, 1996), and well-preserved marine microfossils and macroinvertebrates (Deméré and Walsh, 1993). All three members of the Friars Formation, including the conglomerate tongue underlying the project alignment, are rich in vertebrate fossils and are therefore assigned a high paleontological sensitivity.

Scripps Formation – The marine continental shelf deposits of the early middle Eocene-age (approximately 47 million years old) Scripps Formation sporadically intersect the project alignment as it crosses canyons and modern drainages. The SDNHM has six fossil collection localities from the Scripps Formation within a quarter-mile radius of the project alignment. These localities produced fossilized impressions or remains of plants (e.g., leaves of vascular plants) and marine invertebrates (e.g., snails, clams, crabs, and sea urchins). Elsewhere in San Diego County, the Scripps Formation has yielded remains of fossil reptiles (e.g., crocodile and turtle) and terrestrial mammals (e.g., uinatheres, brontotheres, rhinoceroses, and artiodactyls) (Deméré and Walsh, 1993). The Scripps Formation has been assigned a high paleontological sensitivity for the co-occurrence of marine invertebrate and terrestrial vertebrate fossils in these deposits.

Summary and Recommendations

The high paleontological sensitivity of the Scripps Formation and Friars Formation and the moderate paleontological sensitivity of the Lindavista Formation in San Diego County (Deméré and Walsh, 1993; Stephenson et al., 2009), in addition to the presence of several SDNHM fossil collection localities in close proximity to the project alignment, suggest the potential for construction of the proposed project to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of these geologic units have the potential to impact the paleontological resources preserved therein. For these reasons, implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended.

The fossil collection locality information contained within this paleontological records search should be considered private and is the sole property of the San Diego Natural History Museum. Any use or reprocessing of information contained within this document beyond the scope of the SX-PQ project is prohibited.

If you have any questions concerning these findings please feel free to contact me at 619-255-0321 or kmcomas@sdnhm.org.



Sincerely,

Katie McComas
Paleontology Collections Assistant
San Diego Natural History Museum

Enc: *Figure 1: Project map*
Appendix: List of SDNHM fossil localities in the vicinity of the project.

Literature Cited

- City of San Diego. 2011. California Environmental Quality Act, Significance Determination Thresholds. Development Services Department, 84 p.
- Deméré, T.A., and Walsh, S.L. 1993. Paleontological Resources, County of San Diego. Prepared for the San Diego Planning Commission: 1–68.
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- Kennedy, M.P., and Tan, S.S. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series 1:100,000 scale, map no. 3.
- Kern, J.P., and Rockwell, T.K. 1992. Chronology and deformation of Quaternary marine shorelines, San Diego County, California. In, *Quaternary Coasts of the United States: Marine and Lacustrine Systems*. Society of Economic Paleontologists and Mineralogists, Special Publication 48: 377–382.
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- Walsh, S.L. 1996. Middle Eocene mammal faunas of San Diego County, California, Pp. 75–119. In, D.R. Prothero and R.J. Emry (eds.). *The Terrestrial Eocene-Oligocene Transition in North America*. Cambridge University Press.
- Walsh, S.L., Prothero, D.R., and Lundquist, D.J. 1996. Stratigraphy and paleomagnetism of the middle Eocene Friars Formation and Poway Group, southwestern San Diego County, California, Pp. 120–154. In, D.R. Prothero and R.J. Emry (eds.). *The Terrestrial Eocene-Oligocene Transition in North America*. Cambridge University Press.



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September 06, 2017

Rachel Ruston
SDG&E Environmental Project Management
1010 Tavern Road,
Alpine, California 91901

Subject: Letter Report: Minor Project Refinement 8, Sycamore to Peñasquitos 230-kV Transmission Line, San Diego, California.

Dear Ms. Ruston:

This letter report prepared by AECOM documents the cultural resources survey investigation for Minor Project Refinement Number 8 (MPR 8) for San Diego Gas & Electric (SDG&E)'s Sycamore to Peñasquitos 230-kV Transmission Line Project (SX-PQ). The proposed MPR 8 consists of 16 poles (Z479055 to Z479040) and 14 guard structure locations (GS19 to GS32) that extend approximately two miles south of the current SX-PQ project. The proposed MPR 8 is located near the community of Sorrento Valley and on Marine Corps Air Station (MCAS) Miramar in the City of San Diego, California. In compliance with the requirements of Section 106 of the National Historic Preservation Act and the California Environmental Quality Act, AECOM conducted a cultural resources desktop review and survey for the proposed addition to the SX-PQ project. Only Z479053, Z479054, Z479055, GS23, GS31, and GS32 were intensively surveyed during the current project.

Two cultural resources (CA-SDI-10250 and P-37-024739) were updated during the survey effort and one new isolate was recorded (SXPQ-I-2). It is recommended that an Environmentally Sensitive Area (ESA) boundary should be erected to preserve resource CA-SDI-10250, while resource P-37-024739 shall be avoided. The isolate is located outside of the current proposed work area and will not be affected. In accordance with Mitigation Measure (MM) Cultural Resources-1, monitoring by an archaeological monitor and a Native American monitor is recommended if any ground disturbance is required during the proposed project at GS22, GS23, GS24, and GS25 and for initial set up at Z479053. If during monitoring, the AECOM Lead Cultural Resources Specialist determines a subsurface deposit is absent or unlikely, monitoring may cease.

Project Description

Under this proposed refinement, SDG&E seeks to add additional work locations at 16 poles and 14 guard structures (Attachment 1), extending approximately 2-miles south of the current project. The proposed work includes re-tensioning an existing line and installing temporary guard structures. While the re-tensioning activity requires only overhead work, the guard structures may include ground disturbing activities. Guard structures will be accomplished using one of four means:

- 1) Bucket truck staged under transmission line: a bucket truck will be staged under the transmission line to guard resources.

Ms. Rachel Ruston
SDG&E Environmental Project Management
September 06, 2017
Page 2

- 2) Two poles on either side of the transmission line, direct buried into the ground: a two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, will excavate two holes on either side of the transmission line. The holes will be approximately 2-3 feet in diameter and 6-8 feet deep. Poles will be installed and excavated soil backfilled around the poles. An additional pole will be installed across the top of the two poles to guard resources. Upon completion of the project, the poles will be completely removed from the ground and soils contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite will be used as backfill.
- 3) Flower pot staged under the transmission line; a flower pot consists of an approximate 5 feet by 5 feet by 4 feet concrete base that holds up a temporary pole. The flower pot sits on level ground surface and no ground disturbance is needed for this type of installation.
- 4) Protective material installed on distribution lines: a bucket truck will be utilized to install rubber insulating blankets on distribution line crossing underneath the transmission line to protect the transmission line from being energized in the event it were to touch the energized distribution line.

All construction equipment and supplies would remain within the proposed delineated work areas. Access to the work areas will be obtained through existing access roads.

Project Personnel

Shannon E. Foglia, M.A., RPA, served as principal investigator. The survey effort was conducted by Kyle Ports, M.A. RPA and Allana Griffin, B.A. from AECOM. Justin Linton from Redtail Monitoring and Research, Inc. (Red Tail) served as the Native American Monitor during the survey. This letter report was completed by Mr. Ports and Ms. Foglia.

Archival Research

Prior to the cultural resources monitoring by AECOM, SDG&E performed a search of the records on file at the South Coastal Information Center (SCIC) in January of 2017, provided to SDG&E under contract, and shared the results with AECOM. A supplemental records search was performed by SDG&E for previously recorded sites and previous survey reports within a 0.25-mile buffer of the proposed components in August 2017 because the proposed MPR 8 work areas are located outside of the original search area. The records search revealed that two cultural resources, CA-SDI-10250/P-37-010250 (prehistoric lithic scatter) and CA-SDI-11789/P-37-011789 (prehistoric lithic scatter), have been previously identified within 100 feet of the proposed MPR 8 work areas. Both will be avoided during construction.

MCAS Miramar is considered 100 percent inventoried and a further cultural resource survey of MCAS property is not needed. A desktop review of resources within the vicinity of MPR 8 work locations was performed. The desktop review occurred for Z479040 through Z479055, GS19 through GS22, and GS24 through GS30.

Field Survey and Results

An intensive pedestrian survey of the MPR 8 work locations on private land was conducted on August 17, 2017 by Kyle Ports, M.A., RPA, Allana Griffin, B.A. from AECOM, and Justin Linton from Redtail. The

survey was performed by surveying a 98 feet radius surrounding three of the poles, Z479053, Z479054, and Z479055, in order to identify any surface cultural resources. On August 25, 2017, a field visit was conducted by Shannon E. Foglia, M.A., RPA with SDG&E, AECOM, and Wilson, the construction contractor, to verify the work locations and survey the additional guard structures as needed. Only GS23, GS31, and GS32 were surveyed.

Of the 16 poles, 13 were located on MCAS Miramar property and were previously surveyed. Of the 14 guard structures three were located outside MCAS Miramar property and on heavily disturbed land. Access to poles and guard structures will be using existing access roads or overland travel; no new roads are planned for this project. During the survey one new resource was observed and two resources were updated. Table 1 presents the field survey results and recommendations during construction.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479040	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479041	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479042	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479043	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479044	Re-tension line	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479045	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479046	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479047	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479048	Re-tension line	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479049	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
Z479050	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479051	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479052	Re-tension line	Dirt access road off Miramar Road	On MCAS Miramar; not surveyed. None.	None; overhead work only.
Z479053	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; positive.	Avoid resource; establish ESA at CA-SDI-10250. A qualified archaeologist and Native American monitor should monitor the initial use and set up of the work area.
Z479054	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
Z479055	Re-tension line	Dirt access road off Eastgate Mall	Surveyed; none.	None; overhead work only.
GS19	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS20	Install guard structure	Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS21	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS22	Install guard structure	Dirt access road off Governor Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS23	Install guard structure	Dirt access road of Frost-March Place	Surveyed; positive.	Avoid P-37-024739; monitor. Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.

Table 1. Survey Results and Recommendations for MPR 8

Site Location	Proposed Action	Proposed Access	Result	Recommendation
GS24	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS25	Install guard structure	Dirt access road off Nobel Drive	On MCAS Miramar; not surveyed. None.	Moderate potential; a qualified archaeologist and Native American monitor should be present if ground disturbance is required.
GS26	Install guard structure	Nobel Drive	On MCAS Miramar; not surveyed. None.	None; low potential.
GS27	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS28	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS29	Install guard structure	Miramar Road	On MCAS Miramar; not surveyed. None.	None; low potential.
GS30	Install guard structure	Dirt access road off Eastgate Mall	On MCAS Miramar; not surveyed. None.	None; low potential.
GS31	Install guard structure	Eastgate Mall	Surveyed; none.	None; low potential.
GS32	Install guard structure	Dirt access road off Eastgate Mall	Surveyed; none.	None; low potential.

CA-SDI-10250 (P-37-010250)

This resource consists of a prehistoric temporary camp with a lithic scatter that was first recorded by RBR & Associates in 1985 (Robbins Wade 1985). RBR & Associates also conducted test units and surface scrapes. The site comprises of a shallow subsurface deposit with manos, scrapers, choppers, and bifacial knives (Perry and Tift 1985). In 1995, Gallegos & Associates expanded the site boundaries after recording flakes and stone tools west of the original site. ASM Affiliates returned to the site in 2002 to perform a subsurface testing program at the site. They recommended the site as not significant (Palette 2002); based on this result, the site is not eligible for listing on the California Register of Historic Resources (CRHR). July Roy from AECOM visited the site in 2015 and did not relocate any artifacts within the portion of the site surveyed.

During the current survey, two prehistoric artifacts were recorded just west of the site boundary. The assemblage consisted of a lithic tool and one mano. These artifacts are likely no longer in situ based on the location of the finds. The current site boundary will be extended to include the new artifacts recorded.

P-37-024739

This resource is comprised of a newly documented segment of the Atchison, Topeka and Santa Fe (AT&SF) Railroad. The railroad has been recorded under P-37-024739 elsewhere in the county. P-37-024739 was originally recorded in 2002 by CRM Tech (Ballester and Woodard 2002). It consists of the AT&SF Railroad, originally called the California Southern Railroad that was first constructed in 1880-1888. The AT&SF Railroad played a role in the development of San Diego County from 1880-1920. The resource was previously determined eligible for the National Register of Historic Resources in 1998, as well as recommended eligible for the CRHR and the City of San Diego's Register of Historic Resources (Daly 2015). The current segment was identified during desktop review. The project will avoid impacts to the railroad.

SXPQ-I-2

This prehistoric isolate consists of a mano located approximately 15-meters southwest of an existing pole. The isolate was discovered amongst a small pile of broken cobbles on the shoulder of an access road. The vegetation consisted of small shrubs, and tall weeds. The isolate is located just outside the work area boundary and will not be impacted.

Cultural Resources Results and Recommendations

Based on the archival research conducted by SDG&E and the pedestrian survey conducted by AECOM, one cultural resource (SXPQ-I-2) was recorded and two sites (CA-SDI-10250 and P-37-024739) were updated during the current survey. The isolate is not eligible for the CRHR. The isolate is located outside of the current proposed work area and will not be impacted. CA-SDI-10250 has been subject to archaeological testing and was previously recommended as not eligible for the CRHR. The site will be avoided during construction. An ESA will be established at the site prior to work beginning. Resource P-37-024739 is a segment of an NRHP eligible railroad and it shall be avoided during construction activities. An ESA is not recommended at this location due to the fact that it is an active railroad. All resources will be recorded or updated on the appropriate Department of Parks and Recreation 523 forms and submitted to the SCIC at the completion of the project.

The current project area was not previously analyzed by the environmental impact report and it is not currently mapped for sensitivity of buried cultural resources. The CPUC Qualified Archaeologist reviewed each work location with proposed ground disturbance and its potential to impact buried resources. Most of the guard structures are along well developed roads. Excavation will likely be within fill material with a low potential for buried resources. Based upon previous analysis for potential for buried deposits, monitoring by a qualified archaeologist and Native American monitor was recommended at four guard structure locations (GS22, GS23, GS24, and GS25) that were near waterways or pre-existing resources. Additionally, initial work at Z479053 should be monitored and an ESA established at the work location. No further cultural resources work is recommended at the remaining 25 locations where pedestrian survey and previous surveys have indicated that it is unlikely that subsurface cultural resources are present in the area proposed for activity or where only overhead work will occur.

Ms. Rachel Ruston
SDG&E Environmental Project Management
September 06, 2017
Page 7

In the event that cultural resources are encountered during overhead activities, work in the immediate vicinity will be suspended within 50 feet of the find until the discovery is assessed by a qualified archaeologist, SDG&E archaeologists are contacted, and treatment is determined. Although there is no evidence to suggest the presence of human remains, in the unlikely event that human remains are encountered during overhead activities, all work will cease within 50 feet and the county coroner will be contacted, per the California Public Resources Code. MM-Cultural Resources-4 will be followed. A copy of this letter report will be sent to the SCIC.

Yours sincerely,



Kyle Ports M.A., RPA and
Archaeologist
kyle.ports@aecom.com



Shannon E. Foglia M.A., RPA
Senior Archaeologist
shannon.foglia@aecom.com

cc: Jennifer Kaminsky (SDG&E), Edith Moreno (SDG&E), Michelle Fehrensén (AECOM), Chelsea Ohanesian (AECOM), and J. Lennox (SCIC)

References:

- ASM Affiliates, Inc.
2002 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Ballester, Daniel and Teresa Woodard
2002 Site update form of P-37-024739. On file at the South Central Coastal Information Center.
- Daly, Pamela
2015 Historic Resource Technical Report for the Chollas Creek Multi-use Path to Bayshore Bikeway Project, San Diego, California.
- Perry, J. and L. Tift
1996 Site update form of CA-SDI-10250. On file at the South Central Coastal Information Center.
- Robbins Wade, Mary
1985 Site form of CA-SDI-10250. On file at the South Central Coastal Information Center.

Attachments:



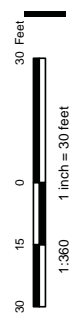
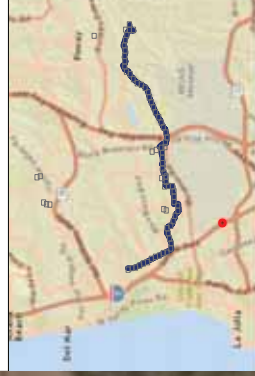
Ms. Rachel Ruston
SDG&E Environmental Project Management
September 06, 2017
Page 8

MPR 8 Temporary Work Areas



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



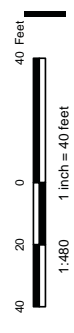
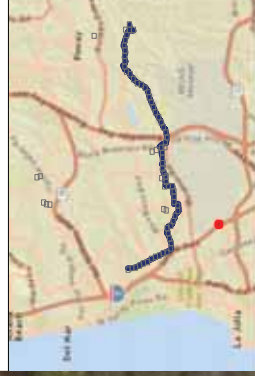
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479040**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



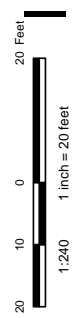
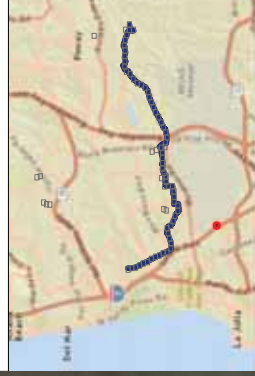
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479041**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



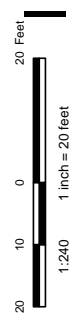
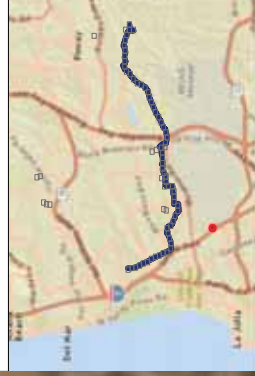
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479042**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479043**

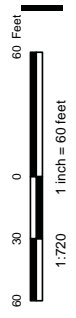
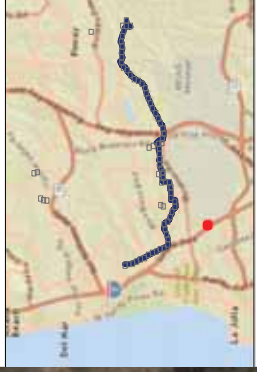
9/1/2017



Marine Corps Air Station Miramar

Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479044**

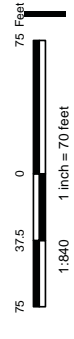
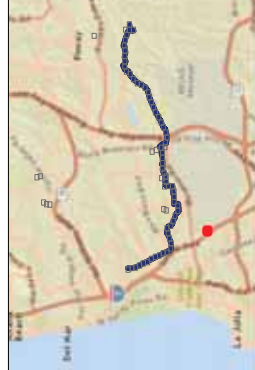
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Marine Corps Air Station

Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



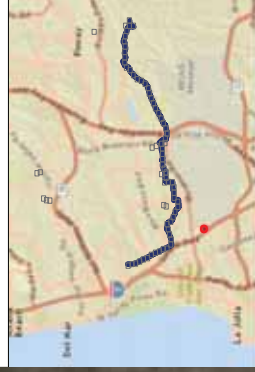
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479045**

9/1/2017



Legend

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- Temporary Work Area



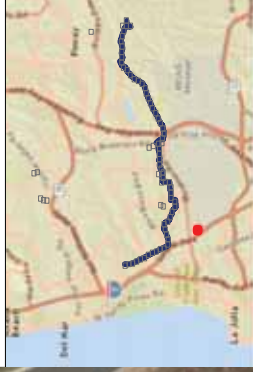
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**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479046**



Legend

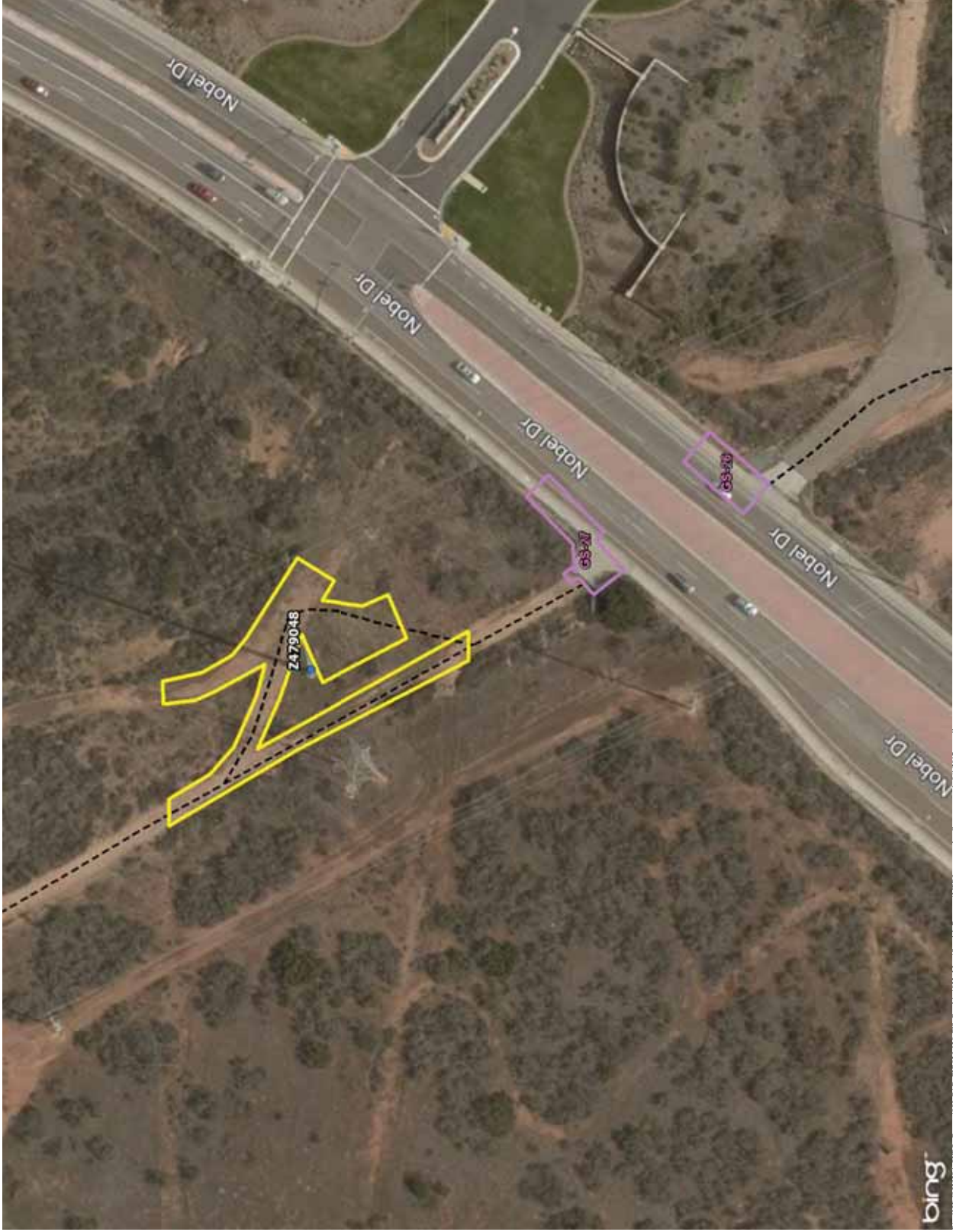
- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



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0 30 60
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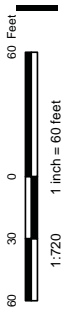
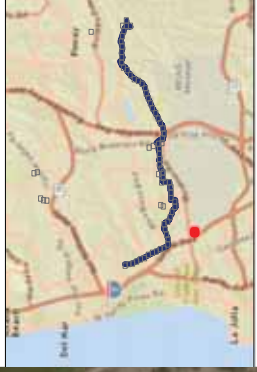
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479047**

9/1/2017



Legend

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- Temporary Work Area
- Guard Structure

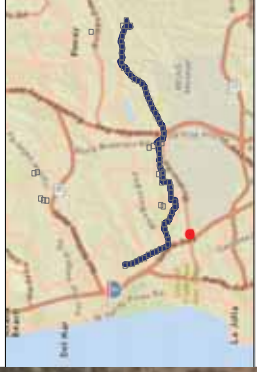


**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479048**

9/1/2017



- Legend**
- (MPR 8 Poles
 - - - Access Road
 - Temporary Work Area
 - Guard Structure



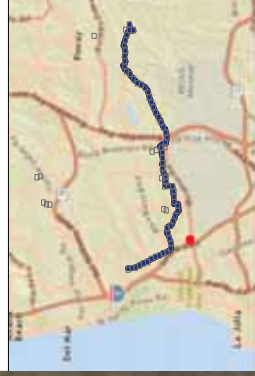
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**Sycamore to Peñasquitos
 230kV Transmission Line Project
 Proposed Refinement Area - MPR 8
 Z479049**



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



1:360
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30 15 0 30 Feet

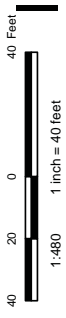
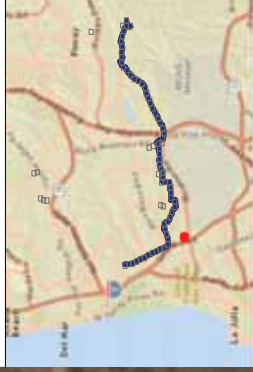
**Sycamore to Peñasquitos
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Z479050**

9/1/2017



Legend

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- Temporary Work Area



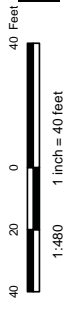
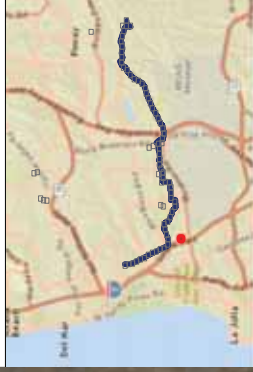
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479051**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



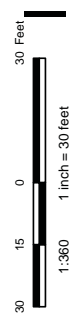
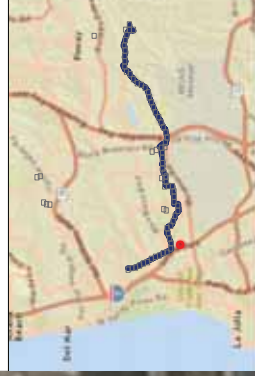
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479052**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



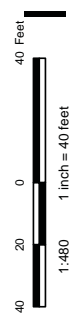
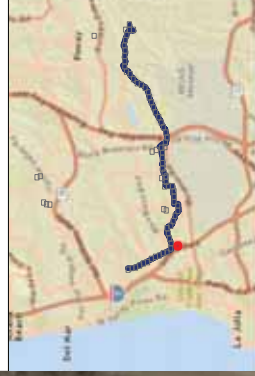
**Sycamore to Peñasquitos
230 kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479053**

9/1/2017



Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure



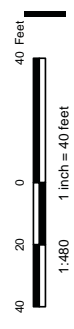
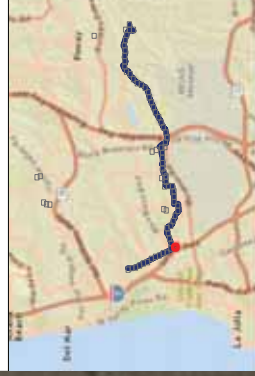
**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479054**





Legend

- (MPR 8 Poles
- - - Access Road
- Temporary Work Area



**Sycamore to Peñasquitos
230kV Transmission Line Project
Proposed Refinement Area - MPR 8
Z479055**

9/1/2017

Memorandum

To	Jennifer Kaminsky, San Diego Gas and Electric (SDG&E)	Page	1
CC			
Subject	Rose Creek Stream Crossing Jurisdictional Impact Site Assessment for the SDG&E Sycamore-Peñasquitos Transmission Project (Project)		
From	Michelle Fehrensen, AECOM		
CC	Chelsea Ohanesian, AECOM		
Date	September 14, 2017 (Revised on August 1, 2018)		

The Proposed Project Modification for the Sycamore-Peñasquitos 230 Kilovolt (kV) Transmission Line Project (Project) consists of adding temporary work area around 16 poles (Z479040 through Z479055) and 14 guard structures (GS 19 through GS 32) south of Carroll Canyon Road and east of Interstate 805 (I-805). If the Right-of-Entry permit from the San Diego Metropolitan Transit Development Board to access GS 23 requires installation of the guard structures to protect the railroad, the contractor would cross Rose Creek to install GS 23 for work on Poles Z479044 and Z479045. However, protection of the railroad using alternative methods, such as a bucket truck, are anticipated to be sufficient.

The existing road that goes through the Rose Creek drainage has been eroded away over time making it difficult to cross the creek without damaging the banks of the drainage. If crossing Rose Creek is needed, and to facilitate vehicle and equipment travel through the drainage, the contractor proposes to install large metal plates with cribbing material that could support the weight of work vehicles across the creek bed.

On August 30, 2017 a wildlife biologist, Ron Walker, conducted a site visit with the contractor to mark the contractor's proposed location of the metal plates. On August 31, 2017 a wetland specialist, Sundeep Amin, conducted a site assessment of the proposed location of the metal plates to confirm they would be placed outside the limits of waters under the jurisdiction of the California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB). The wetland specialist conducted a follow-up site visit of the crossing location on September 12, 2017 to memorialize the proposed location of the metal plates. During the site visit, the wetland specialist used a global positioning system (GPS) to map jurisdictional limits, as well as the coordinates of the corners of the proposed steel plates as marked in the field (Attachment A¹). The wetland specialist also marked the locations of the corners of the metal plates with pin flags (Attachment B). The pin flags clearly delineate that the plates, and any

¹ The aerial used in Attachment B is from 2016 and was the most recent aerial available which may not reflect the conditions currently onsite. Representative photographs are included in Attachment A.

support blocking, would be placed outside the jurisdictional areas. The use of steel plates to facilitate vehicle and equipment travel over Rose Creek is not expected to impact potential jurisdictional waters.

Species in the immediate vicinity of the proposed Rose Creek crossing include, western ragweed (*Ambrosia psilostachya*), rabbit's foot grass (*Polypogon monspeliensis*), umbrella sedge (*Cyperus eragrostis*), unknown sedge (*Cyperus* sp.), unknown eleocharis (*Eleocharis* sp.), unknown mustard (*Brassica* sp.), sow-thistle (*Sonchus oleraceus*), spotted spurge (*Chamaesyce maculata*), and cocklebur (*Xanthium strumarium*). Surrounding vegetation consisted of a mix of Diegan coastal sage scrub on the surrounding hills with patches of sycamores (*Platanus racemosa*) and poison oak (*Toxicodendron diversilobum*) closer to the drainage itself.

Attachments:

Attachment A – CDFW Limits Map

Attachment B – Site Photographs

ATTACHMENT A: CDFW LIMITS MAP



Legend

- () Corners of Steel Crossing Plate
- CDFW Limits
- Guard Structure
- - - Access Road

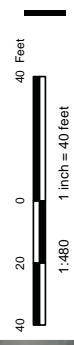
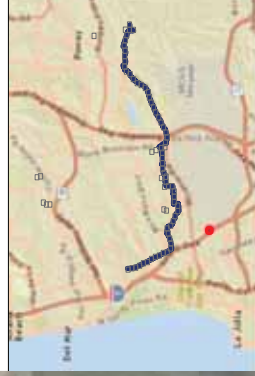


Figure 1
Sycamore to Peñasquitos
CDFW Limits Map
Rose Creek Stream Crossing Memo
9/14/2017

ATTACHMENT A
SITE PHOTOGRAPHS

Attachment B: Site Photographs
SX-PQ Rose Creek Steam Crossing Site Assessment



Photo 1. Photo (facing north) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.



Photo 2. Photo (facing east) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.



September 6, 2017

Kyle Ports, M.A., RPA
Archaeologist
AECOM
401 West A Street, Suite 1200
San Diego, CA 92101

RE: Paleontological Resources Memo for the SDG&E SX-PQ Minor Project Refinement 8 for Poles Z479055 to Z4790404

Dear Mr. Ports:

This paleontological memorandum evaluates the potential impacts on paleontological resources associated with Minor Project Refinement (MPR) 8 for the San Diego Gas and Electric (SDG&E) Sycamore to Peñasquitos (SX-PQ) 230 kV Transmission Line Project. The MPR is located between poles Z479055 and Z4790404, and extends approximately two miles south of the current SX-PQ project. It includes proposed temporary work areas to access 16 existing poles for wire re-tensioning and installation of 14 guard structure (GS) locations south of CC MM CP, use of existing access roads, and existing pads for pulling sites. Installation of guard structures at 14 work locations will use a combination of direct bury and bucket trucks. Ground disturbing activities are expected to be limited to the installation of direct bury guard structures, which will require auger holes that are 2-3 feet wide and 6-8 feet deep. The remainder of the proposed work activities are not anticipated to require ground disturbance. The paleontological analysis consisted of a review of geologic mapping by Kennedy and Tan, 2008, and a paleontological records search of the MPR alignment and 1/4-mile buffer at the San Diego Natural History Museum (SDNHM) (McComas 2017; Attachment A).

MPR 8 is primarily located in moderate sensitivity Quaternary (Pleistocene) very old paralic deposits (also referred to as Lindavista Formation), and high sensitivity Eocene Scripps Formation and Stadium Conglomerate (also referred to as the conglomerate tongue of the Friars Formation), with minor areas of low sensitivity later Quaternary (Holocene) alluvium deposits that overlie Scripps Formation (McComas, 2017; Kennedy and Tan, 2008). Moderate and high sensitivity deposits are mapped at the surface of guard structure locations GS-19 to GS-21, GS-24, and GS-26 to GS-32, and are likely present at shallow depths beneath the low sensitivity Holocene alluvium at GS-22 and GS-23. All of the geologic units within MPR 8 occur elsewhere in the SX-PQ alignment, and are described in detail in the project's Draft Environmental Impact Report (Panorama Environmental, Inc., 2015). The SDNHM reported that there six localities from the Scripps Formation within a 1/4-mile radius of the MPR 8 alignment (McComas, 2017); however none are within the proposed work areas. The six localities produced fossil leaves and marine invertebrates including snails, clams, crabs, and sea urchins (McComas, 2017).

Based on the results of the analysis, MPR 8 has the potential to result in impacts to paleontological resources during direct bury guard structure excavation into native sediments at all of the 14 proposed locations. The

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remainder of the work proposed by MPR 8 is not anticipated to result in impacts to paleontological resources since 1.) the proposed work locations are on developed/previously disturbed areas, 2.) there is no new ground disturbance associated with re-tensioning the lines or guard structures using bucket trucks, and 3.) there are no known fossil localities within the proposed work areas. Monitoring and fossil recovery will be implemented in accordance with Mitigation Measures Paleontology-1 through 3 during ground disturbance related to installation of direct bury guard structures, and in the event that unanticipated fossils are encountered.

If you have any questions concerning the results for this study, please contact me at crichards@paleosolutions.com.

Sincerely,

Courtney Richards, M.S.
Principal Paleontologist
Paleo Solutions, Inc.

REFERENCES

- Kennedy, M.P. and S.S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, scale 1:100,000.
- Panorama Environmental, Inc. 2015. Sycamore-Penasquitos 230-kV Transmission Line Project Draft Environmental Impact Report. State Clearinghouse No. 2014081031. Dated September 2015.
- McComas. K. 2017. Paleontological Records Search – SX-PQ Project. Paleontological records search conducted by the San Diego Natural History Museum. Letter results dated 15 August 2017.



ATTACHMENT A: SDNHM Record Search Results



SAN DIEGO NATURAL HISTORY MUSEUM
BALBOA PARK - SAN DIEGO SOCIETY OF NATURAL HISTORY - ESTABLISHED 1874

15 August 2017

Ms. Barbara Webster
Paleo Solutions
911 S. Primrose Avenue, Unit N
Monrovia, CA 91016

RE: Paleontological Records Search – SX-PQ Project

Dear Ms. Webster:

This letter presents the results of a paleontological records search conducted for the SX-PQ project, located in the southern portion of the Sorrento Valley neighborhood and western portion of MCAS Miramar within of the City of San Diego, San Diego County, CA. The project alignment lies east of Interstate 805, and extends southeast from just south of Carroll Canyon Road to south of Governor Drive.

A review of published geological maps covering the project alignment and surrounding area was conducted to determine the specific geologic units underlying the project. Each geologic unit was subsequently assigned a paleontological resource sensitivity following City of San Diego and County of San Diego guidelines (City of San Diego, 2011; Deméré and Walsh, 1993; Stephenson et al., 2009). Published geological reports (e.g., Kennedy and Peterson, 1975; Kennedy and Tan, 2008) covering the project alignment indicate that the proposed project has the potential to impact four geologic units: Holocene-age alluvial flood plain deposits, the early to middle Pleistocene-age Lindavista Formation, and the middle Eocene-age Stadium Conglomerate and Scripps Formation. However, deposits mapped as the Stadium Conglomerate that lie north of State Route 52 were referred to the conglomerate tongue of the Friars Formation by Walsh (1996) and Walsh et al. (1996). Therefore, the conglomerate tongue of the Friars Formation is assumed to underlie the project alignment in areas mapped as the Stadium Conglomerate. All of the geologic units underlying the project alignment and their paleontological sensitivities are summarized in detail in the following section.

In addition, a search of the paleontological collection records housed at the San Diego Natural History Museum (SDNHM) was conducted in order to determine if any documented fossil collection localities occur along the project alignment or within the immediate surrounding area (Figure 1). The SDNHM has six recorded fossil localities within a quarter mile of the project alignment, all from the Scripps Formation (Appendix). These localities are described in greater detail below.

Geologic Rock Units Underlying the Project Alignment

Holocene alluvial flood plain deposits – Holocene alluvial flood plain deposits (mapped by Kennedy and Tan, 2008, as Qya) underlie the alignment where it crosses Rose Canyon. The SDNHM does not have any fossil collection localities from Holocene alluvial flood plain deposits within a quarter-mile radius of the project alignment. These deposits are generally considered to be less than 10,000 years old and are assigned a low paleontological sensitivity based on their young geologic age and the lack of known fossil localities. However, these surficial deposits likely overlie strata of the Scripps Formation (see below), which could be impacted when excavation depths exceed approximately 5–10 feet below surface grade.

Lindavista Formation – The marine and/or non-marine terrace deposits of the early to middle Pleistocene-age (approximately 1.5 to 0.5 million years old) Lindavista Formation underlie the majority of the project alignment as it crosses the mesas at higher elevations. More specifically, these deposits rest on the Linda Vista terrace (approximately 855,000 years old) of Kern and Rockwell (1992), and are equivalent to Unit



9, very old paralic deposits, of Kennedy and Tan (2008). The SDNHM does not have any fossil collection localities from these deposits within a quarter-mile radius of the project alignment. Fossils have primarily been recovered from localities in Tierrasanta and Mira Mesa where the Lindavista Formation is assigned a high paleontological sensitivity; elsewhere in San Diego County, including along the project alignment, the Lindavista Formation is assigned a moderate paleontological sensitivity.

Friars Formation (mapped as Stadium Conglomerate) – The fluvial deposits of the middle Eocene-age (approximately 47 to 46 million years old) Friars Formation (mapped by Kennedy and Tan, 2008, as the Stadium Conglomerate) underlie several short segments of the project alignment along the upper margins of Rose Canyon. The SDNHM does not have any fossil collection localities from the Friars Formation within a quarter-mile radius of the project alignment. Elsewhere in San Diego County, the Friars Formation has produced vertebrate fossils, including terrestrial mammals (e.g., opossums, insectivores, primates, rodents, artiodactyls, and perissodactyls; Walsh, 1996), and well-preserved marine microfossils and macroinvertebrates (Deméré and Walsh, 1993). All three members of the Friars Formation, including the conglomerate tongue underlying the project alignment, are rich in vertebrate fossils and are therefore assigned a high paleontological sensitivity.

Scripps Formation – The marine continental shelf deposits of the early middle Eocene-age (approximately 47 million years old) Scripps Formation sporadically intersect the project alignment as it crosses canyons and modern drainages. The SDNHM has six fossil collection localities from the Scripps Formation within a quarter-mile radius of the project alignment. These localities produced fossilized impressions or remains of plants (e.g., leaves of vascular plants) and marine invertebrates (e.g., snails, clams, crabs, and sea urchins). Elsewhere in San Diego County, the Scripps Formation has yielded remains of fossil reptiles (e.g., crocodile and turtle) and terrestrial mammals (e.g., uinatheres, brontotheres, rhinoceroses, and artiodactyls) (Deméré and Walsh, 1993). The Scripps Formation has been assigned a high paleontological sensitivity for the co-occurrence of marine invertebrate and terrestrial vertebrate fossils in these deposits.

Summary and Recommendations

The high paleontological sensitivity of the Scripps Formation and Friars Formation and the moderate paleontological sensitivity of the Lindavista Formation in San Diego County (Deméré and Walsh, 1993; Stephenson et al., 2009), in addition to the presence of several SDNHM fossil collection localities in close proximity to the project alignment, suggest the potential for construction of the proposed project to result in impacts to paleontological resources. Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits of these geologic units have the potential to impact the paleontological resources preserved therein. For these reasons, implementation of a complete paleontological resource mitigation program during ground-disturbing activities is recommended.

The fossil collection locality information contained within this paleontological records search should be considered private and is the sole property of the San Diego Natural History Museum. Any use or reprocessing of information contained within this document beyond the scope of the SX-PQ project is prohibited.

If you have any questions concerning these findings please feel free to contact me at 619-255-0321 or kmccomas@sdnhm.org.



Sincerely,

Katie McComas
Paleontology Collections Assistant
San Diego Natural History Museum

Enc: *Figure 1: Project map*
Appendix: List of SDNHM fossil localities in the vicinity of the project

Literature Cited

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