

SDG&E 02/15/13 Complete Response
Cleveland National Forest Review of the San Diego Gas & Electric Preliminary Plan of
Development for the Master Special Use Permit (Dated December 7, 2012)

SECTION I. POD REVIEW

2.0 Purpose and Need

Question #1

As described in the POD the purpose of the project remains the same as it was described in the Environmental Assessment (EA) released in March 2009. The EA describes the connection between the project purpose and Land Management Plan (LMP) goals, objectives, strategies, and standards. The key items are reiterated here to emphasize their importance to the project.

Goal 7.1 – Retain natural areas as a core for a regional network while focusing the built environment into the minimum land area needed to support growing public needs.

Facilities supporting urban infrastructure needs are clustered on existing sites or designated corridors, minimizing the number of acres encumbered by special-use authorizations. Special-uses serve public needs, provide public benefits, and conform to resource management and protection objectives. All uses are in full compliance with the terms and conditions of the authorization. There is a low level of increase in the developed portion of the landscape as measured by road densities; in fact, over time, the built environment is shifted away from or designed to better protect resource values (LMP Part 1, Page 48).

Lands 2 – Non-Recreational Special Use Authorizations (LMP Part 2, Cleveland Strategy, Page 112)

Administer existing special-use authorizations in threatened, endangered, proposed and candidate species habitats to ensure they avoid or minimize impacts to threatened, endangered, proposed and candidate species and their habitats, cultural and scenic resources, and open space values.

Efficiently administer special-use authorizations (SUAs) on National Forest System lands.

Work with special-use authorization holders to better administer National Forest System land and to reduce administrative cost.

Require special-use authorizations to maximize opportunities to co-locate facilities and minimize the encumbrance on National Forest System land.

For special-use authorization holders operating within threatened, endangered, proposed and candidate species key and occupied habitats develop and provide information and

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education on the ways to avoid and minimize effects on their activities on occupied threatened, endangered, proposed and candidate species habitat.

Use signing, barriers, or other suitable measures to protect threatened, endangered, proposed and candidate species in key and occupied habitats within the special-use authorization areas.

Plan Standards

S42: Include provisions for raptor safety when issuing permits for new power lines and communication sites (see guidelines in [Forest Plan] Appendix G). Also implement these guidelines for existing permits within five years in other high-use raptor flyways. Coordinate with California Department of Fish and Game, U.S. Fish & Wildlife Service, and power agencies to identify high-use flyways (LMP Part 3, Page 9).

Based on the updated proposed action described in the Plan of Development (POD), some additional Land Management Plan (LMP) standards will need to be addressed including:

S5: Treat all freshly cut live or recently dead conifer stumps with a registered fungicide to prevent the establishment of annosus root disease.

S9: Design management activities to meet the Scenic Integrity Objectives (SIOs) shown on the Scenic Integrity Objectives Map.

S10: Scenic Integrity Objectives will be met with the following exceptions:

- Minor adjustments not to exceed a drop of one SIO level is allowable within the Forest Supervisor's approval.
- Temporary drops of more than one SIO level may be made during and immediately following project implementation providing they do not exceed three years in duration.

S11: When occupied or suitable habitat for a threatened, endangered, proposed, candidate or sensitive (TEPCS) species is present on an ongoing or proposed project site, consider species guidance documents (see Appendix H) to develop project-specific or activity-specific design criteria. This guidance is intended to provide a range of possible conservation measures that may be selectively applied during site-specific planning to avoid, minimize or mitigate negative long-term effects on threatened, endangered, proposed, candidate or sensitive species and habitat. Involve appropriate resource specialists in the identification of relevant design criteria. Include review of species guidance documents in fire suppression or other emergency actions when and to the extent practical.

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S12: When implementing new projects in areas that provide for threatened, endangered, proposed, and candidate species, use design criteria and conservation practices (see Appendix H) so that discretionary uses and facilities promote the conservation and recovery of these species and their habitats. Accept short-term impacts where long-term effects would provide a net benefit for the species and its habitat where needed to achieve multiple-use objectives.

S18: Protect known active and inactive raptor nest areas. Extent of protection will be based on proposed management activities, human activities at the onset of nesting initiation, species, topography, vegetative cover, and other factors. When appropriate, a no-disturbance buffer around active nest sites will be required from nest-site selection to fledging.

S22: Except where it may adversely affect threatened and endangered species, linear structures such as fences, major highways, utility corridors, bridge upgrades or replacements, and canals will be designed and built to allow for fish and wildlife movement.

S24: Mitigate impacts of on-going uses and management activities on threatened, endangered, proposed, and candidate species.

S30: Avoid activities that result in removal, crushing, burying, burning, or mowing of host plants within critical and occupied habitat for threatened, endangered, and proposed butterfly species; unless guided differently by a species-specific consultation.

S47: When designing new projects in riparian areas, apply the Five-Step Project Screening Process for Riparian Conservation Areas as described in Appendix E – Five-Step Project Screening Process for Riparian Conservation Areas.

S60: Until proper evaluation occurs, known heritage resource sites shall be afforded the same consideration and protection as those properties evaluated as eligible to the National Register of Historic Places

S61: Leave human remains which are not under the jurisdiction of the County Coroner undisturbed unless there is an urgent reason for their disinterment. In case of accidental disturbance of human remains, excavation of human remains, or subsequent re-internment of human remains follow national forest, federal and tribal policies.

CNF S6 – Place new power lines (33 kV or less), telephone lines, and television cables underground wherever possible.

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CNF S9 – Avoid or mitigate, following consultation, activities resulting in direct trampling or erosion problems to Laguna Mountains skipper suitable and occupied habitat and adjacent areas (Laguna and Palomar Places).

CNF S13 – Avoid or mitigate activities that may negatively affect San Diego Thornmint (*Acanthomintha ilicifolia*) occupied habitat (Sweetwater Place).

San Diego Gas & Electric Company (SDG&E) Response:

SDG&E took into consideration all applicable federal, state, and local policies and plans, including the United States Forest Service's (USFS's) LMP and its goals, objectives, strategies, and standards, when devising the Proposed Action and evaluating its potential impacts in the Preliminary POD. For clarity, SDG&E will revise the POD to further emphasize where, and in what manner, the LMP goals and standards highlighted in the USFS's December 7, 2012 letter are included in the POD. In addition, a policy consistency analysis table describing how each of these goals and standards will be addressed in the revised POD is included as Attachment A: Land Management Plan Policy Consistency Analysis.

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4.0.2 Other Facilities

Question #1

The proposed action will need to specify the types and locations of appurtenant facilities, including weather stations, fire detection equipment, smart grid equipment, and any other items proposed for the projects, including any video monitoring cameras proposed for deployment.

SDG&E Response:

SDG&E has identified the types and locations of existing appurtenant facilities (other than minor distribution switches and other minor equipment) that will be replaced as part of the Proposed Action.

As to appurtenant facilities that may be required in the future, SDG&E cannot predict the nature and location of such facilities at this time. The Proposed Action would include the right by SDG&E to install any appurtenant facilities that are necessary or prudent to ensure the safe and reliable operation of its system or as required by relevant statutes, orders, rules, and other technical policies and standards.

Based on a conversation with the USFS on February 8, 2013, SDG&E understands that the USFS is not requesting information regarding minor appurtenant facilities (e.g., minor smart grid equipment and switches) but is interested in the types and locations of any weather stations and fire detection equipment currently operating within the Cleveland National Forest (CNF). Because the location and nature of appurtenant equipment is sensitive, SDG&E has submitted a list of existing appurtenant facilities located within the CNF to the California Public Utilities Commission (CPUC) in a supplemental response to the Energy Division's December 20, 2012 "Data Request No. 2 – Completeness" to ensure the confidential treatment of this information.

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4.1 Single to Double Circuit Conversion

Question #1

The POD emphasizes that the proposed action would not increase system capacity, yet doubling certain circuits would appear to increase the capacity of the system between selected substations. The proposed action should explain any changes to system capacity that will result from the additional circuits.

SDG&E Response:

No changes to the system capacity will result from the additional circuits; rather, the additional circuits will provide increased system reliability. “System capacity,” as used in this context, refers to the nominal operating voltages of the transmission facilities in question. In this case, the nominal operating voltage of the electric transmission facilities affected is 69 kilovolts (kV), and this will not change. What may change is the thermal load-carrying capability of affected transmission lines, as their conductors are replaced and/or reconfigured.

As described in the Preliminary POD, the Proposed Action includes reconfiguring portions of two existing 69 kV power lines (TL)—TL625B and TL629E—from a single- to double-circuit configuration. TL625B would be reconfigured from a single three-terminal line connecting three substations (Loveland, Barrett, and Descanso substations) to two two-terminal lines connecting two substations each (Loveland and Barrett substations and Loveland and Descanso substations). This proposed reconfiguration was previously identified by SDG&E as a necessary measure to prevent potential overloading on another 69 kV power line—TL626, which connects Descanso and Santa Ysabel substations—from occurring. The proposed reconfiguration of TL625B was also evaluated and approved by the California Independent System Operator (CAISO) as a necessary measure to meet mandatory North American Electric Reliability Corporation reliability standards for SDG&E’s electric transmission system. This change will not affect the system capacity of TL625B.

TL629E is also proposed to be reconfigured from a single three-terminal line connecting three substations (Descanso, Cameron, and Crestwood substations) to two two-terminal lines connecting two substations each (Descanso and Crestwood substations and Cameron and Crestwood substations). This proposed reconfiguration was identified by SDG&E during a review of the electric transmission system as being necessary to prevent an interruption of service to customers served from Crestwood Substation in the event TL629 is temporarily removed from service. This change will not affect the system capacity of TL629E.

These proposed reconfigurations do not in any way alter the potential system load nor allow for an increase in system capacity. From a technological perspective, the capacity of these power lines is limited to the voltage ratings of the substation facilities and other related equipment. To increase the system capacity, the installation of additional substation and associated equipment would be required. The Proposed Action does not include the

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installation of such equipment; therefore, the voltage rating and system capacity will remain the same. In addition, SDG&E would have to obtain CAISO approval and CPUC authority to increase the voltage ratings (i.e., the capacity of these lines). SDG&E is not requesting this authority from the CPUC or CAISO.

As noted previously, these proposed double-circuit reconfigurations are designed—and, in the case of TL625B, mandatory—to improve system reliability and maintain service to SDG&E’s customers in eastern San Diego County in the event of temporary losses in service of other 69 kV power lines within SDG&E’s electric transmission system. As described in the Preliminary POD, these single- to double-circuit configurations would eliminate existing tap poles that currently create added risk to the reliability of the system. Eliminating these poles and providing redundancy in the system will provide SDG&E with the ability to reroute electricity and maintain service, not increase system capacity. The POD will be revised to provide this additional clarification regarding single- to double-circuit conversion and system capacity.

Question #2

Upgrading the conductors on the 69 kV systems would also appear to increase overall system capacity. Please explain any changes to the system capacity that will result from the upgraded conductors.

SDG&E Response:

The Proposed Action will not result in any increase in overall system capacity. “System capacity,” as used in this context, refers to the nominal operating voltages of the transmission facilities in question. In this case, the nominal operating voltage of the electric transmission facilities affected is 69 kV, and this will not change. What may change is the thermal load-carrying capability of affected transmission lines, as their conductors are replaced and/or reconfigured.

The Proposed Action includes the replacement of existing aluminum or copper conductors with aluminum-clad, steel-supported conductors in order to increase the safety of the lines, as well as improve efficiency and response times when repairs to the 69 kV power lines are required. The proposed conductors identified in the Preliminary POD were selected due to these conductors’ superior performance and strength. The larger, stronger conductor will be significantly more resistant to potential damage from extreme wind conditions, lightning strikes, and tree-line contact in comparison with the existing conductors. The proposed conductors will also reduce the potential for line breakages or other failures that could result during hazardous weather conditions. Because the proposed conductors are stronger and more resistant to damage, they are anticipated to have longer useable lifespans than the existing conductors, which would reduce maintenance requirements and further improve service reliability. In addition, the proposed conductor is one of the standard conductors in use by SDG&E. Because fewer types of conductors will be used systemwide, SDG&E will be able to stock sufficient quantities of the conductor, shortening repair times and lowering

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future operation and maintenance costs. Although the proposed conductors are physically capable of transmitting voltages higher than 69 kV, as discussed previously, the Proposed Action does not include or authorize any increase in voltage rating. Any such increases to system capacity would require changes to the substation and other infrastructure. Further, any proposed increases to system capacity would require additional CAISO and CPUC evaluation and approval beyond that which has been requested in SDG&E's Permit to Construct application. The POD will be revised to provide additional clarification regarding the upgraded conductors, their additional safety benefits over the existing conductor types, and their relation to system capacity.

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5.0.0 No Action Alternative

Question #1

The POD does not correctly summarize the No Action alternative considered in the EA. Under the No Action alternative new permits would not be issued, and the existing permits would terminate according to their terms (36 CFR 251.60(a)(2)(iii)), which include removal of all facilities and restoration of the site.

SDG&E Response:

This statement is correct: the March 2009 EA described the No Action alternative as one where a new permit would not be issued for the existing electric lines, the expired permits would terminate according to their terms, and the existing lines would be removed and restoration of the site would occur. The POD will be revised to address this comment.

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5.1 Relocation of TL 626 (Boulder Creek Line)

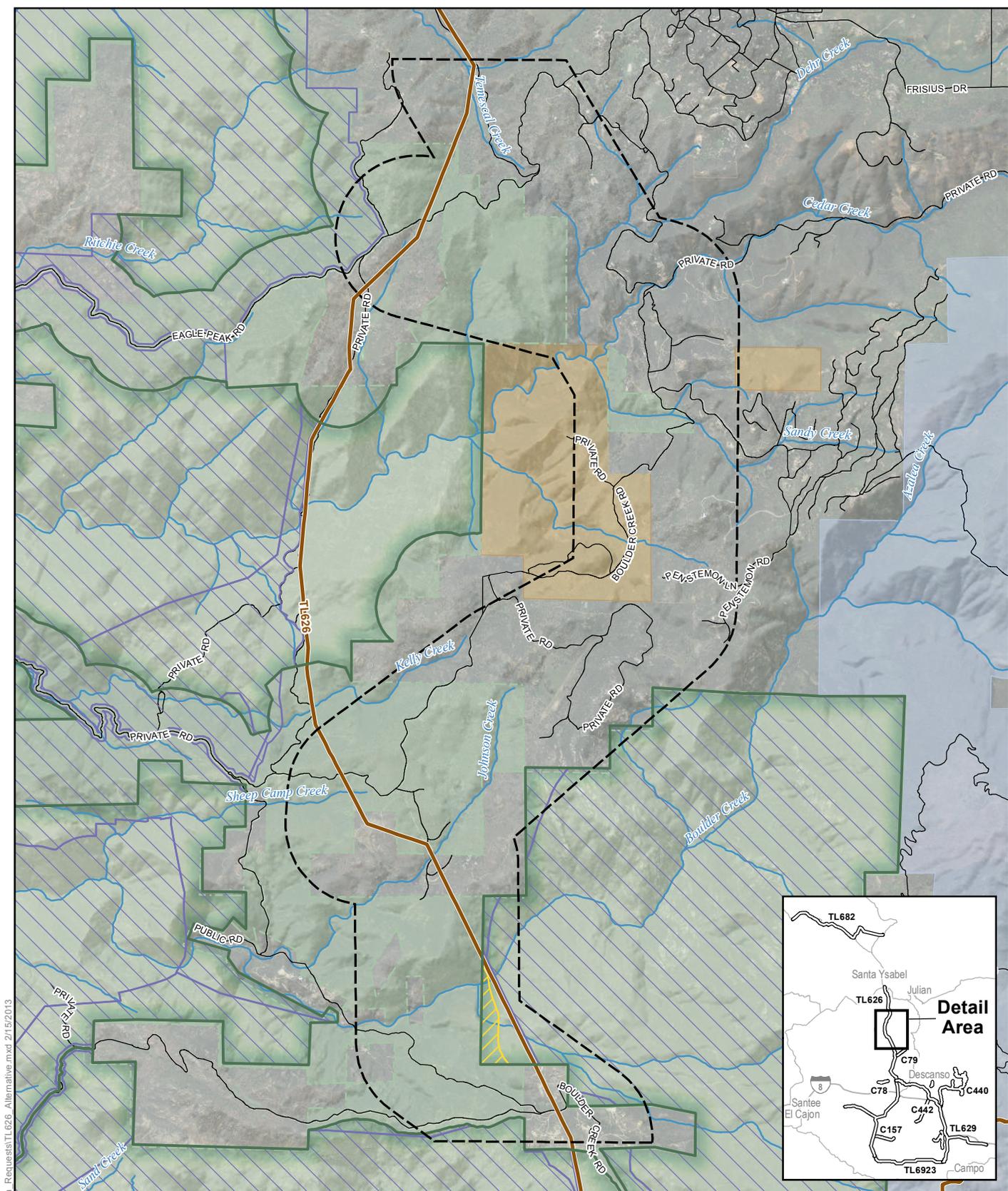
Question #1

This TL crosses through an area with high resource concerns, and the current condition does not meet the LMP desired resource condition for the area. It is also being considered for a Recommended Wilderness Land Use Zone as part of the LMP amendment project. The Forest Service wants to fully develop the relocation alternative and consider it in detail in the EIS. The Forest Service will work with SDG&E to identify the best alternative location for consideration.

SDG&E Response:

SDG&E will work with the USFS to identify feasible alternatives necessary to avoid impacts to resources. SDG&E notes that TL626 (including access roads) is outside of the areas identified by the USFS as proposed Recommended Wilderness, and that the area has not yet been formally recommended as Wilderness. SDG&E will continue to participate in the USFS' LMP amendment process to request that the Recommended Wilderness Land Use Zone exclude SDG&E facilities. SDG&E would not anticipate that an alternative that avoids Recommended Wilderness is required unless the adopted Recommended Wilderness area includes SDG&E facilities.

Nonetheless, at the USFS's request, SDG&E is working to identify a possible alternative location for the segment of this power line between poles Z372142 and Z213670, which is the segment of TL626 that crosses the Inventoried Roadless Area in the vicinity of the proposed Recommended Wilderness Land Use Zone. Using available existing topographical, road, parcel, land use, and environmental resource data, SDG&E has created an approximately 3,000-foot-wide preliminary study corridor within which a potential alternative route may be identified; this study corridor is shown in Figure 1: TL626 Potential Alternative Study Corridor. The study corridor's location takes into consideration the avoidance of the USFS's proposed Recommended Wilderness Land Use Zones and Inventoried Roadless Areas, while at the same time ensuring connectivity between Descanso and Santa Ysabel substations and continued service to customers served by distribution underbuild along this segment of the power line. As a result, the study corridor includes an area somewhat longer than requested by the USFS, extending from pole Z372113 to Z213678.



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Figure 1: TL626 Potential Alternative Study Corridor USFS MSUP/CNF Power Line Replacement Projects

- | | | | |
|---------------------------------------|--|------------------------------|-------------------------------|
| Potential Alternative Study Corridor* | Inventoried Roadless Area | United States Forest Service | Road |
| Proposed Action/
Current Alignment | Proposed Back Country
Motorized Use Restricted Area | Bureau of Indian Affairs | Lake |
| Proposed Recommended
Wilderness | California Department of
Parks and Recreation | Stream | SDGE
Sempra Energy utility |

*Study corridor was identified based on preliminary review of environmental constraints and engineering considerations. Feasibility of potential realignment of TL626 is yet to be determined.
Source: SDG&E, 2013; USFS, 2013; CPAD 1.8, 2012 GreenInfo Network

1:50,000
0 0.5 1 Miles



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SDG&E will continue to refine its analysis in order to identify a potential alternative route that can be constructed within this study area. Although SDG&E anticipates that it will be technologically possible to reconstruct the line within an alternative location outside of the proposed Recommended Wilderness Land Use Zones, SDG&E notes that USFS and CPUC will need to assess the “feasibility” of any such alternative location. SDG&E notes that “feasible” is defined under both the National Environmental Policy Act and the California Environmental Quality Act to require consideration of a number of factors in addition to technological feasibility, including legal, environmental, social, and economic feasibility. Considerations that should be taken into account in determining whether an alternative within the study area is feasible include: safe and viable locations for new poles; access to these new pole locations; additional rights-of-way and access easements; construction methods, including any necessary helicopter landing zones and staging areas; and biological, cultural, hydrological, and other potential environmental resource impacts associated with construction outside of the existing alignment. These considerations must be properly and fully documented and evaluated prior to moving forward with any alternative within the study area.

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7.0.0 Access Roads

Question #1

There are four categories of roads that need to be considered in the proposed action:

- State and county roads used by SDG&E for access
- Forest Service roads open to the general public
- Forest Service roads maintained for administrative access
- SDG&E permitted use roads

SDG&E Response:

The Preliminary POD considers state and county roads used by SDG&E for access, as well as SDG&E exclusive-use roads, in Section 7.0 Access and Section 10.6 Transportation and Traffic. SDG&E will work with the USFS to delineate which USFS roads are identified for general public use and which are maintained for administrative access, and will include a discussion of these additional two road categories in the revised POD.

Question #2

For analysis purposes it might be more efficient to consider the access roads with the other roads as part of the transportation and traffic section (10.6).

SDG&E Response:

For the purposes of analysis in the Preliminary POD, SDG&E considered potential impacts to transportation and traffic on state and county roads in Section 10.6 Transportation and Traffic. Because access roads included in the Proposed Action are defined as those reserved for SDG&E-exclusive use, they are not open to the public. As a result, these roads were not considered in the transportation and traffic analysis because no impacts to public use would occur.

Question #3

The amount of permitted use roads has increased from 35 miles in 2009 to 47 miles in the POD. As was described in the EA, the MSUP should include measures to ensure that all access roads are surveyed and evaluated for resource issues, and plans developed to correct any problems.

SDG&E Response:

Based on the most current geographic information system (GIS) information, SDG&E maintains approximately 47 miles of permitted use roads (including approximately 30 miles of existing access roads, spur roads, and turnarounds to support and provide access to its existing 69 kV power lines, and approximately 17 miles of access roads to support existing

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12 kV distribution lines or circuits [C]). The current inventory is based on extensive fieldwork conducted in recent years to develop a complete inventory. Because it is possible that mapping errors or gaps in access may be found, SDG&E will work with the USFS to update this information and establish new access roads if necessary. Section 3.3 of SDG&E's draft Operations and Maintenance (O&M) Plan confirms that authorized access routes within the CNF are to be mapped in SDG&E's GIS, addresses access road maintenance, and requires that any new roads be evaluated for resource issues. The draft O&M Plan states that no new access roads may be constructed without the written consent of the USFS, following an evaluation of potential resource issues.

Question #4

The Forest Service and SDG&E have been working successfully over the last few years to address erosion concerns with specific road segments (for example, the roads on the north-slope of Barber Mt. and along Boulder Creek). The proposed action should reflect these actions and provide greater detail as to how these concerns will be addressed in the MSUP.

SDG&E Response:

The Proposed Action includes actions that have been working successfully over the last few years to address erosion concerns. These actions include the following:

- Using existing access roads only
- Examining and recording videos of existing public and private access road segments to document their condition prior to construction
- Maintaining access roads during their use for construction activities to ensure that they are left in equal or better condition than prior to construction use
- Smoothing existing dirt roads by removing ridges, especially following storm events
- Installing rolling water bars
- Utilizing turn-around locations rather than crossing through creeks, where applicable

More specifically, the Proposed Action includes specific actions that have been implemented successfully on the north slope of Barber Mountain and along Boulder Creek. At Barber Mountain, the Proposed Action includes regular maintenance of the road, vegetation trimming or maintenance every other year, and refreshing the best management practices (e.g., water bars, fiber rolls) to promote continued effectiveness.

The Proposed Action also includes actions that have been successful along Boulder Creek, including prohibiting vehicle use within Boulder Creek. The Proposed Action further includes permanent reconfiguration of the existing access road to prohibit travel through Boulder Creek for access to poles Z372130 and Z372131. The Proposed Action instead includes turn-around locations on either side of Boulder Creek, which would eliminate the creek crossing while maintaining necessary access to these poles. The change has been included in the Proposed Action, as shown in Figure 2: Proposed Turn-Around Locations for TL626.

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At the request of the USFS, SDG&E is also evaluating all proposed replacement pole locations within the vicinity of riparian conservation areas to identify those poles and associated access roads that can be reasonably relocated outside these areas.

Section 4.5 Access Road Modification of the Preliminary POD will be revised to provide additional detail regarding these actions, as well as reflect SDG&E's survey and notification procedures regarding access roads and address erosion concerns prior to construction.

In addition, as described in the response to Question #3 of 7.0.0 Access Roads, the draft O&M Plan contemplates that all access roads will be surveyed and evaluated for resource issues, as well as plans to correct any problems that may arise after the Proposed Action is approved.

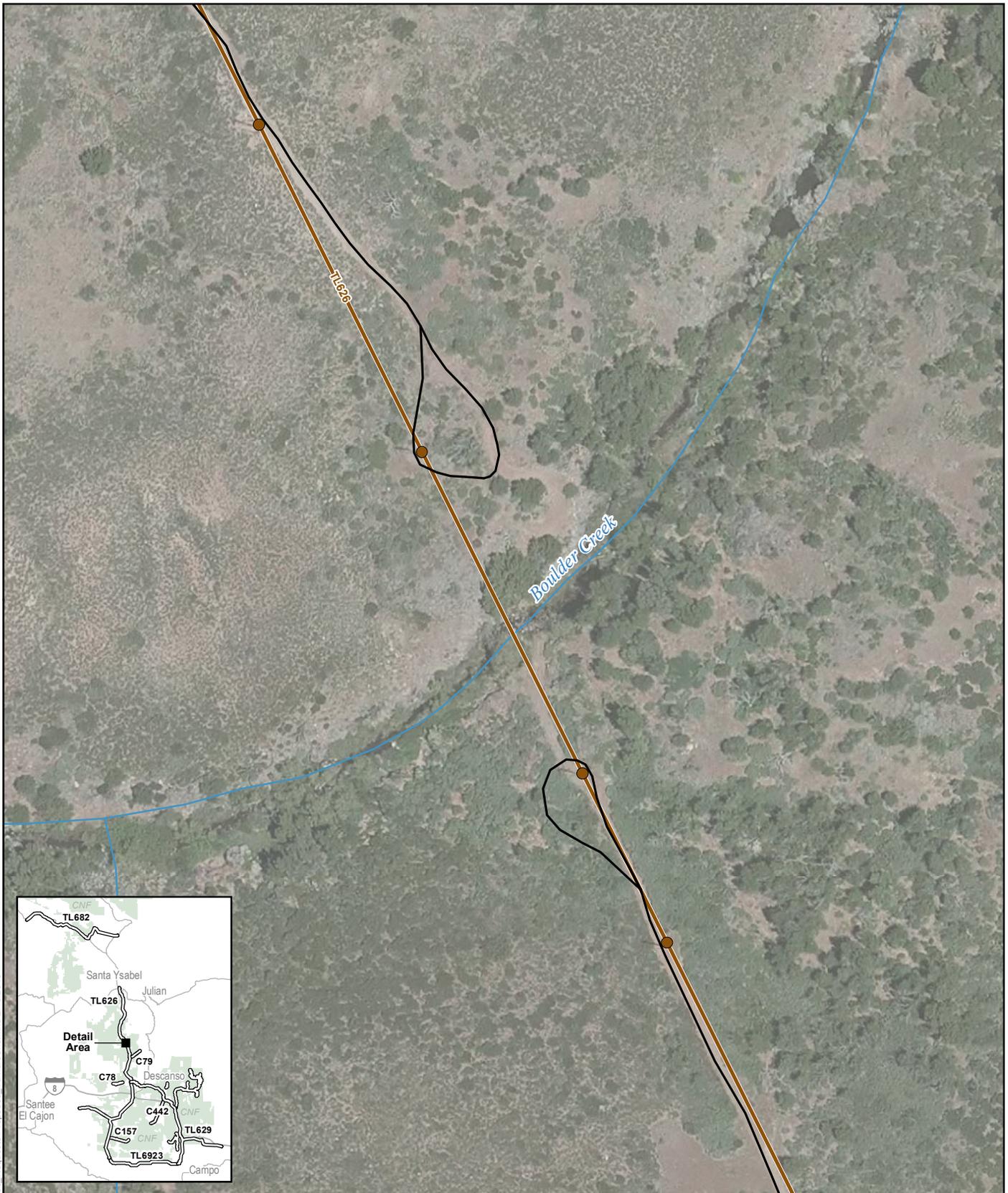
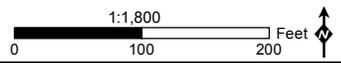


Figure 2: Proposed Turn-Around Locations for TL626 USFS MSUP/CNF Power Line Replacement Projects

- Access Road and Turn-Around
- Proposed Action/ Current Alignment
- ~ Stream



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Source: SDG&E, 2013; USFS, 2013

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7.0.1 Helicopter Access

Question #1

The hours of operation proposed for helicopter use are not consistent with the San Diego County noise ordinance.

SDG&E Response:

The San Diego County Noise Ordinance prohibits construction noise outside the hours of 7:00 a.m. to 7:00 p.m. on Monday through Saturday, as well as on Sundays and holidays. The noise ordinance also establishes a variance process for non-emergency work on public utility facilities, pursuant to which deviations from construction noise restrictions can be permitted. Under Section 36.423 of the noise ordinance, in the event that certain construction activities cannot conform to the prescribed noise limits or hours for construction activities, the County noise control officer may grant a variance allowing deviations from those requirements. Deviations from the noise ordinance requirements can be appropriate depending on the potential noise impacts to each potentially affected property, the value to the community of the work proposed to be performed, and other similar factors. In order to begin construction at 7:00 a.m., in some instances SDG&E may need to fly helicopters from their respective home airfields to the Proposed Action staging areas or landing zones prior to 7:00 a.m. to pick up workers or construction materials. Where appropriate, SDG&E would coordinate with the County noise control officer regarding these flights to avoid any conflicts with the County noise ordinance.

Question #2

We expect helicopter fueling to be conducted off National Forest System land.

SDG&E Response:

Three staging areas within the CNF have been identified as potential helicopter landing zones; however, helicopter fueling would not be conducted at these locations. Helicopters may refuel at fly yards that are not located within the CNF, if necessary.

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8.2 Pesticide Application

Question #1

The Forest Service does not authorize the use of pesticides on a general basis. Under the permit pesticide applications are approved on an annual basis based on specific use requests. The pesticide use proposal would need to be developed in much greater detail if SD&GE intends to use pesticides on the National Forest during the permit term. The Forest Service would be willing to work with SDG&E to refine the pesticide use proposal so that it is consistent with Forest Service policy, and so that it can take advantage of the risk assessments completed for common pesticides. More information on Forest Service policy and the risk assessments are available at:

<http://www.fs.fed.us/foresthealth/pesticide/index.shtml>.

SDG&E Response:

SDG&E does not currently use pesticides within the CNF. Pest control is typically only necessary at substations and storage facilities; therefore, insecticide and rodenticide use is not anticipated for the facilities included in the Proposed Action. However, if pesticide use is determined to be prudent to safely maintain the 69 kV power lines and 12 kV distribution lines within the CNF, a pesticide use request providing a 12-month period schedule will be submitted annually to the USFS for approval. The draft O&M Plan previously submitted with the POD included provisions for pesticide use. Consistent with SDG&E Safety Standard G8367 Pesticide Management and as described in the draft O&M Plan for the Master Special Use Permit (MSUP), SDG&E may use one or more of the following insecticides:

- Hit Squad Industrial Insecticide, or
- Blast 'Em (Wasp & Hornet Killer).

Similarly, SDG&E may use one or more of the following herbicides during pole brushing, cut-stump treatments associated with tree removals, or other O&M activities where vegetation removal is necessary for fire safety reasons:

- Rodeo,
- Roundup,
- Roundup Pro,
- Accord Concentrate,
- Gallery 75DF,
- Garlon 4 Ultra,
- Landmark XP,
- Milestone,
- Pathfinder,
- Payload,

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- Stalker,
- Spra-Kil SK-26, and/or
- Dimension Ultra 40.

If the use of herbicides is determined to be necessary within the CNF in the future, SDG&E would work with the USFS to obtain authorization for the specific uses for which herbicides are required. Prior to any herbicide use, SDG&E would submit an anticipated schedule to the USFS for any proposed herbicide use on an annual basis, or more frequently as needed, and would work with the USFS to determine the appropriate herbicide per location. Herbicide application would occur under the direction of a professional pesticide applicator with either a Qualified Applicator License or an Agricultural Pest Control Adviser License in the State of California. Section 8.2 Application of Pesticides of the Preliminary POD will be revised to reflect this information for inclusion in the MSUP.

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10.1.0 Biological Resources

Question #1

The requirement that all 69 kV power line structures would be constructed in compliance with the APLIC's Suggested Practices for Avian Protection on Power Lines should also apply to the 12kV lines included in the proposed action. There may be measures to reduce or avoid line strikes similar to what was done for Sunrise that could also be included in the MSUP. The work CNF did for this project in 2005 included an analysis and map showing key raptor areas and flyways, and those areas would be a priority for line marking.

SDG&E Response:

SDG&E complies with Avian Power Line Interaction Committee (APLIC) guidelines for all 12 kV distribution lines or circuits in the service territory, and also implements internal avian protection guidelines to reduce potential impacts to avian species from line strikes and electrocution. SDG&E previously surveyed all 69 kV power line and 12 kV distribution line poles within the CNF to determine which poles would require avian protection measures. Many of these poles have been retrofitted during past operation and maintenance activities. The Proposed Action replacement poles would include the same or similar protections as the retrofitted poles and would fully comply with the APLIC guidelines.

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10.2 Cultural Resources

Question #1

The Cultural Resources Survey Report for the Proposed Action and Connected and Similar Actions prepared by ASM affiliates, Inc. in April 2011 that is cited in this section has not been submitted to the CNF for review. Please submit that report directly to the CNF Heritage Program Manager.

SDG&E Response:

A draft Cultural Resources Technical Report—*Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project – Confidential*—was provided in January 2013 directly to the CNF Heritage Program Manager. The final report will be provided in the next three months.

Question #2

There are several issues with the Applicant-Proposed Measures (APM) discussed in association with the Proposed action, including:

- APM-CUL-03: Potentially eligible or “archaeologically sensitive” resources are not the only cultural resources that will be protected within the MSUP APE. In accordance with the Regional Programmatic Agreement (RPA) (USFS 2001), unevaluated cultural resources are treated as if they were eligible for the NRHP (like historic properties), and are managed and maintained in such a way that their values are protected (Stipulation III.D(3) of the RPA). Potential effects to historic properties within the MSUP APE on the CNF would be avoided through implementation of Standard Resource Protection Measures (SRPM), as defined in and in accord with the RPA. If historic properties are present within the undertaking’s APE and would be affected by the undertaking, and the Standard Resource Protection Measures (pursuant to Stipulation III.D(2) of the RPA) contained in Attachment B of the RPA cannot or will not be implemented, then the procedures outlined in 36 CFR 800 will be followed regarding evaluation, determination of effects, review, and consultation. The Forest (and SDG&E) will comply with 36 CFR 800 for the undertaking if it is determined that it may adversely affect historic properties.
- APM-CUL-04: Monitoring is not adequate mitigation for conducting ground disturbance within archaeological site boundaries on the CNF. No ground disturbance will occur within the boundaries of cultural resources (archaeological sites) on the CNF without completion of the NRHP eligibility evaluation process, determination of ineligibility for nomination to the NRHP, or completion of data recovery for NRHP eligible sites, in consultation with Tribes and SHPO.

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- Cultural resources encountered in association with ground disturbing activities conducted within archaeological site boundaries that are, or are being treated as historic properties are not “inadvertent effects,” they are adverse effects to historic properties and constitute a violation of the Archaeological Resource Protection Act (ARPA 1979). Archaeological monitors will not collect cultural material or recover archaeological resources within the project area without written authorization by the CNF.
- APM-CUL-05: No road improvement or new pole excavation will occur within cultural resource (archaeological site) boundaries unless such resources have been evaluated, determined to be ineligible for nomination for listing on the National Register of Historic Places (NRHP) under the applicable criteria and that determination has been concurred with by the State Historic Preservation Officer (SHPO) through consultation conducted by the CNF.
- APM-CUL-06: Any Cultural Resources Treatment Plan developed by SDG&E that includes recommendations for National Register eligibility evaluation of cultural resources will be developed in coordination with the CNF HPM, Tribes, and SHPO. There will be no recovery or collection of cultural materials by SDG&E or its contractors.
- APM-CUL-07: The MSUP standard conditions will establish the direction for inadvertent discoveries All inadvertent discoveries of cultural material, particularly those involving human remains or potential funerary items will be immediately reported to the authorized officer and CNF Heritage Program Manager. The size and duration of the work stoppage, the type of treatment or evaluation necessary, determination of eligibility, and/or implementation of the Native American Grave Protections and Repatriation Act (NAGPRA) process will be developed by the CNF Heritage Program Manager in consultation with the SDG&E cultural resources specialist, Tribes, and SHPO, in accord with Stipulation V of the RPA, and approved by the authorized officer. Ground disturbing work in the vicinity of the discovery will not resume without authorization by the authorized officer.

SDG&E Response:

For clarity, the responses to Cultural Resources Question #2 have been divided into subparts (a) through (e) by each APM. Each response first addresses the comments provided for that APM, and is followed by a redlined and strikethrough version of the revised APM language.

- (a) The Cultural Resources Technical Report (Williams and Schaefer 2012) supports the comment provided for APM-CUL-03. All sites would be protected as Environmentally

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Sensitive Areas if work would be conducted within the 50-foot buffer zone. The APM will be revised to state the following:

- APM-CUL-03: All potentially National Register-eligible or archaeologically sensitive sites, as defined in the Cultural Resources Technical Report, that will not be directly affected by construction but are within 50 feet of replacement pole locations will be designated as Environmentally Sensitive Areas (ESAs). Potentially eligible resources include those that are recommended eligible, as well as unevaluated sites. Protective fencing or other markers will be erected and maintained to protect these ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs will not be signed or marked as cultural, historical, or archaeological resources.

- (b) With regard to the first comments provided for APM-CUL-04, in some cases, pole replacement would occur within the mapped site boundary; however, the replacement pole locations have been designed to utilize existing disturbance areas and/or the existing pole hole, with no additional excavation outside of the previously disturbed areas. Monitoring for conformance with this condition would always be required. Any work proposed outside of existing disturbed footprints (e.g., temporary poles or shoo-fly poles) would require implementation of avoidance measures and potentially testing.

The Cultural Resources Technical Report (Williams and Schaefer 2012) supports the second comment for APM-CUL-04, as only isolated, diagnostic finds are eligible for collection with the approval from the USFS HPM prior to collection. All other finds (i.e., those identified within existing site boundaries) would require that work be stopped and undergo USFS-SDG&E management and consultation if necessary. APM-CUL-04 will be revised as follows.

- APM-CUL-04: An archaeological or cultural monitor will be present during construction activities that occur within or adjacent to identified archaeological or cultural resource site boundaries, respectively, as identified in the Cultural Resources Technical Report, if the replacement pole requires a foundation or a larger hole than the existing wood pole location to be excavated to ensure conformance with prescribed avoidance measures. The monitor will identify potential archaeological or cultural resources that may be unexpectedly encountered during construction, and will have the authority to divert or temporarily halt construction activities in the area of discovery ~~to allow the recovery of archaeological or cultural resources in a timely fashion.~~ When~~When~~In the event that archaeological or cultural resources are discovered, the monitor will ~~recover them in accordance with professional standards~~stop work and notify the Principal Investigator (PI), who will inform SDG&E and the USFS Heritage Program Manager (HPM) of the stoppage. The archaeologist, in consultation with the USFS HPM and SDG&E's Cultural Resource Specialist, will determine the significance of the discovered resources. The USFS HPM and SDG&E's Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, preservation in-place will be the preferred manner of mitigating for impacts. For resources that cannot be

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preserved in place, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts in consultation with the USFS HPM, the Tribes, and the SHPO. No collection of archaeological or cultural resources will occur on USFS property without prior USFS HPM consent. Daily logs will be kept by all monitors, and a monitoring report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, will be prepared at the conclusion of each phase of monitoring. Any new cultural sites or features encountered will be recorded with the South Coastal Information Center. Monitors will also identify and delineate an approved footpath through the archaeological and cultural resource sites for construction crews, as needed.

- (c) The Cultural Resources Technical Report partially concurs with the approach provided in the comments for APM-CUL-05. More specifically, road improvements within sites would be determined on a case-by-case basis, and only roads in such a state of disrepair that require improvement for safety reasons would undergo improvement. APM-CUL-05 will be revised to outline and enforce the stipulation that road improvements within sites will be limited to those only instances where necessary.

All new pole locations proposed within sites were eliminated during the engineering design process for the Proposed Action. When referencing “new” poles, the POD in this instance refers to new *replacement* poles. APM-CUL-05 will be revised to demonstrate a difference between the two types of poles—new versus replacement.

- APM-CUL-05: SDG&E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources Technical Report, such as ~~limiting access road improvements in~~ avoiding access road improvements within culturally sensitive areas unless improvements are required for safety reasons; replacing new poles within the previously disturbed area (two to four feet) of represented by the existing poles locations, where necessary, to avoid sensitive resources; and cutting existing poles at grade level, where specified and landowner approval is provided. Same-hole pole placement will also be utilized on a case-by-case basis. No new pole locations will be placed within cultural resource boundaries unless the appropriate consultation (including Section 106) has taken place. No temporary poles will be located within sites unless the appropriate consultation (including Section 106) has taken place.

- (d) Regarding the comments for APM-CUL-06, and as provided in response to APM-CUL-04, no collection or evaluation plan would be prepared and implemented without consultation with the USFS. APM-CUL-06 will be revised to reflect the consultation process and USFS HPM involvement in decision-making.

- APM-CUL-06: In consultation with the USFS HPM, the Tribes, and the SHPO, SDG&E will develop a Cultural Resources Treatment Plan that includes procedures for protection and avoidance, evaluation and treatment, and the curation of any potentially register-eligible cultural materials collected during construction. Specific protective measures, including a monitoring program, will be defined in the Cultural

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Resources Treatment Plan to reduce potential adverse impacts on unknown cultural resources to less-than-significant levels.

(e) Regarding the comments provided for APM-CUL-07, the Cultural Resources Technical Report identifies SDG&E as the initial contact for any finds. The next step in the process is to contact the USFS HPM and decide if additional fieldwork or design is needed. APM-CUL-07 will be revised to reflect the USFS HPM involvement in any decision-making that occurs regarding archaeological finds.

- APM-CUL-07: Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, All operations within 50 feet of an inadvertent discovery during construction such activities shall cease and the PI will contact the USFS HPM and SDG&E's eCultural rResource sSpecialist will be contacted should any previously unidentified prehistoric or historic artifacts, indicators or examples of cultural, archaeological, or paleontological resources, or potential human remains be discovered during the course of site preparation, grading, excavation, construction, or other activities. Once the find has been identified and evaluated, the USFS HPM and SDG&E's eCultural rResource sSpecialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are the required treatment in consultation with the United States Forest Service. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the USFS HPM and after the appropriate consultation has taken place.

References:

Williams, Brian and Jerry Schaefer. 2012. Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in Support of the Proponent's Environmental Assessment. Prepared for Insignia Environmental.

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10.2.2 Similar Actions

Question #1

Contrary to the statement regarding wood poles within the boundary of Lilac Village, wood poles are located within the boundary of National Register eligible prehistoric archaeological site CA-SDI-08534 (Lilac Village). Unauthorized replacement of an SDG&E electrical pole and associated archaeological damage to the site by SDG&E in July of 2008 resulted in the issuance of an Archaeological Resources Protection Act (ARPA) Notice of Violation to SDG&E by the CNF.

SDG&E Response:

Lilac Village is located entirely within the CNF; therefore, all pole replacements within Lilac Village are part of the Proposed Action. The Proposed Action design for these poles is to utilize the existing disturbed areas within the site, including using the existing pole holes for the replacement poles. The poles were micro-sited during Proposed Action design to minimize potential impacts in this area. Site-specific measures will be implemented prior to and during construction in this particular area and will identify and avoid cultural resources and minimize any impacts to the area outside of the existing disturbed pole hole locations.

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10.3 Fire Hazards

Question #1

The MSUP will require SDG&E to submit a fire plan for Forest Service approval. We would like to have a working draft available for public review when we begin scoping. This task should be simplified by the work already completed on the Sunrise O&M fire plan.

SDG&E Response:

Although the Sunrise Powerlink Operating Plan has been finalized, the Sunrise O&M Fire Plan has not. SDG&E will work with the USFS to develop a fire plan for the MSUP facilities based on the conclusions in the Environmental Impact Statement (EIS) and using the final Sunrise O&M Fire Plan as a template. SDG&E anticipates that the MSUP Fire Plan will be finalized after the MSUP is approved.

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10.4 Hydrology and Water Quality

Question #1

The MSUP will require SDG&E to submit an erosion control plan for Forest Service approval. The content of the erosion control plan is guided by the Forest Service Water Quality Management Handbook (R5 FSH 2509.22 Chapter 10) that was issued in 2011 (http://www.fs.fed.us/cgi-in/Directives/get_dirs/fsh?2509.22!r5_ALL). The standard Storm Water Quality Pollution Prevention Plan format can meet the erosion control plan requirements with a few adjustments.

SDG&E Response:

Prior to construction, SDG&E will prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) that includes the USFS requirements of an erosion control plan to the State Water Resources Control Board, in compliance with the National Pollutant Discharge Elimination System general permit for storm water discharges associated with construction and land disturbance activities. SDG&E will also submit the SWPPP to the USFS.

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10.5 Noise

Question #1

As noted in section 7.0.1, all operations will need to comply with the applicable noise ordinances.

SDG&E Response:

Because helicopter use during operation and maintenance activities for the Proposed Action would occur in a similar manner and frequency as the activities currently performed for the existing 69 kV power lines and 12 kV distribution lines, no additional noise impacts from helicopter use during operation and maintenance activities are anticipated to occur.

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10.7 Visual

Question #1

We will be evaluating the potential impacts of the project on scenery according to LMP standards S9 and S10 (see section 2.0 Purpose and Need). The standards provide some flexibility in how we meet that Scenic Integrity Objectives (either through design, reduction of the standard, or a combination of both). However, the taller steel pole may be more visually obtrusive than the current poles, and may not be consistent with LMP standards.

SDG&E Response:

The Visual Resources Technical Report includes a detailed impact evaluation supported by a set of computer-generated visual simulations, and concludes that the Proposed Action would result in only minor, incremental changes that would not affect the intact appearance of the landscape setting within the CNF. The Visual Resources Technical Report also provides APMs, which have been included in the Preliminary POD, to address potential impacts to aesthetics as a result of the Proposed Action. With the implementation of these APMs, the visual change would be consistent with the USFS visual management goals for the CNF and will meet the SIOs. Therefore, a decrease of more than one SIO level is not anticipated.

A comparison of the existing views and visual simulations for the 69 kV power lines and 12 kV distribution lines demonstrates that the components would not result in a noticeable change in visual contrast with regard to line, form, or color. These simulations also indicate that the 69 kV power line and 12 kV distribution line components would not cause a perceptible deviation to the intactness of the existing landscape character. In addition, APM-AES-01 calls for restoring disturbed areas to reduce the potential visual contrast with the surrounding landscape setting. The use of non-reflective conductors and self-weathering, rust-colored poles (as described in APM-AES-03 and APM-AES-04) will further reduce visual contrast and potential visibility.

As described in the response to 10.8 Wilderness Question #1, SDG&E is currently working to identify potential relocation options for C157 at that request of the USFS. However, where this 12 kV distribution line crosses through the Pine Creek and Hauser wilderness areas, the landscape setting does not appear unaltered and, therefore, the area does not currently achieve the SIO "Very High" visual management goal. If C157 were to remain in its current location, the existing poles would be replaced with slightly taller poles of a similar line, form, and color, and the resulting effect would not substantially alter the landscape's appearance of intactness.

At several other locations, including along portions of C449 and C79, the Proposed Action includes the removal of existing 12 kV distribution structures. The removal of these existing structures would result in a noticeable improvement to the existing landscape character, view, and intactness of the landscape setting. In addition, APM-AES-05 includes aesthetic restoration through recontouring and revegetation in a manner that replicates the color and texture of the surrounding landscape in order to reduce the visual contrast of these areas.

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10.8 Wilderness

Question #1

Although C157 was authorized by permit prior to the designation of Pine Creek and Hauser Wilderness Areas, continuation of the use is no longer consistent with the requirements of the 1964 Wilderness Act (Public Law 88-577). Section 4(c) of the Wilderness Act states:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area (16 USC 1133(c)).

Special provisions in subsequent wilderness laws provide guidelines for the management of wilderness based on unique or local or regional circumstances that fall outside the allowable, but nonconforming uses listed in Section 4(d) of the Wilderness Act. The California Wilderness act of 1984 (PL 98-425) did not make such provisions regarding the Pine Creek and Hauser Wildernesses.

The nature of interest in National Forest System lands is limited to the occupancy of land and structures and conduct of activities specified in the special use authorization (36 CFR 251.55(a)). A permit serves as a permissive license for uses of National Forest System lands that are of short duration, but usually greater than one year, and that do not involve permanent commitment of National Forest System resources (FSM 2711.2 – Permit). Special use permits do not establish an existing right that persists past the termination date of the permit. The permit that authorized C157 states that a new permit “may be granted provided the permittee will comply with the then existing laws and regulations governing the occupancy and use of National Forest lands”. A decision to issue a new permit is discretionary on the part of the Forest Service, and must be consistent with applicable laws.

The Statutory language providing the Secretary authority to take “such measures as are necessary in the control of fires,...” refer to the suppression of active wildfire in designated wilderness areas, not upgrades to facilities outside of wildfire incidents. As such, the proposed wood-to-steel replacement for C157 does not constitute an action to control fire as authorized in the Wilderness Act.

In the past discussions regarding C157, SDG&E had considered alternate arrangements for electric service to Sky Valley ranch. The Forest Service would like to work with SDG&E to

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include one or more of those alternatives as part of the proposed action. We will not be able to move forward with the proposed action for C157 as it is currently described.

SDG&E Response:

As previously noted, two short segments of C157 appear to be located within the Pine Creek Wilderness (2 poles, approximately 600 feet) and Hauser Wilderness (7 poles, approximately 2,775 feet). C157 was constructed in the 1950s and predates these Wilderness designations. The failure to exclude C157 from the Wilderness designation appears to have been an oversight. Although the legislative history of the Wilderness Act reveals the intent to exclude other pre-existing electric facilities and the access road to Skye Valley Ranch, there is no such exclusion or other reference to C157 which, like the access road, serves Skye Valley Ranch. SDG&E continues to review the legislative history and official maps to determine conclusively whether the reconstruction of C157 presents a legal conflict with the Wilderness Act.

SDG&E requests that the USFS continue to work with SDG&E to reconsider whether the USFS currently has the legal authority to approve the fire hardening of C157. SDG&E continues to believe that—in light of the history of wildfires, known local conditions, and fire hardening/fire safety objectives of the Proposed Action—the statutory language providing the Secretary with the authority to take “such measures as are necessary in the control of fires ...” could be interpreted to allow the wood-to-steel conversion of C157.

In the event that the USFS concludes that it legally cannot approve the fire hardening of C157, SDG&E respectfully requests that the USFS seek Congressional authority to allow this fire safety project to move forward. Specifically, SDG&E requests that the EIS prepared as part of the USFS’ National Environmental Policy Act review of the Proposed Action includes an alternative to the Proposed Action whereby the USFS seeks authority from Congress to approve the Proposed Action.

At the request of the USFS, SDG&E completed a preliminary evaluation of a number of other potentially constructible alternatives, including the following three overhead relocation scenarios and one underground relocation scenario:

- Overhead relocation between Pine Creek and Hauser wilderness areas, beginning at approximately Pole P278726, that follows Skye Valley Road for approximately 2,000 feet before crossing the northern inlet of Barrett Lake then rejoins Skye Valley Road for approximately one mile before rejoining the existing alignment location at approximately Pole P278740
- Overhead relocation in a new alignment from Corte Madera Ranch, traveling west from existing 12 kV distribution line C442 along the southern boundary of Pine Creek Wilderness for approximately seven miles to Skye Valley Ranch
- Overhead relocation in a new alignment from Los Pinos, traveling west from existing 12 kV distribution line C442 along Espinosa Creek for approximately three miles,

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then traveling south along the eastern boundary of Pine Creek Wilderness for approximately four miles to Skye Valley Ranch

- Underground relocation within Skye Valley Road, and partially through Pine Creek Wilderness where this road passes through that designated area, from approximately Pole P278726 for approximately three miles before rejoining the existing alignment at approximately Pole P278740.

These potential relocation scenarios are depicted in Figure 3: C157 Potential Relocation Alternatives.

At this time, SDG&E is not able to support any of these potential relocation alternatives, primarily because of the increased environmental impacts, construction challenges, customer service implications, and costs associated with these alternatives. Based on a preliminary review, SDG&E believes that replacing the existing wood poles with steel poles within the current alignment would present the fewest environmental impacts and is the most cost-effective alternative. The potential constructible alternatives, by contrast, are all located within relatively undisturbed, remote areas that are difficult to access. C157 is currently located within designated Wilderness, and the existence of the distribution line would be included in the baseline from which environmental impacts are analyzed. Removing C157 from designated Wilderness and relocating it outside of Wilderness would present substantial additional environmental impacts.

As with the potential realignment of TL626, the USFS and the CPUC will need to thoroughly assess the feasibility of any potential relocation of C157. Considerations that would need to be taken into account in determining feasibility include: safe and viable locations for new poles; access to these new pole locations; additional rights-of-way and access easements; construction methods, including necessary helicopter landing zones and staging areas adjacent to Wilderness areas; and biological, cultural, hydrological, and other potential environmental resource impacts associated with construction outside of the existing alignment.

In light of these considerations, SDG&E believes that seeking Congressional authority to rebuild C157 in its existing alignment is the superior alternative. As noted above, SDG&E's review of the legislative history and historical maps designating Wilderness Areas is ongoing, and SDG&E will continue to work with USFS to resolve the questions raised by the existing Wilderness designations.

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SECTION II. GENERAL COMMENTS

Question #1

Special Use Permit – The CNF will update the draft special use permit to reflect current policy and direction. The Forest Service would like to have the draft permit, draft O&M plan and draft fire plan available for public review when we begin scoping.

SDG&E Response:

SDG&E submitted a draft O&M Plan and draft Fire Plan to the USFS with the Preliminary POD. SDG&E anticipates that these plans would be finalized after the environmental review process is complete and a Record of Decision has been prepared.

Question #2

SDG&E facilities on acquired NFS lands – The Forest Service would like to identify the circuits that are located on acquired lands so that we can clearly disclose the improvement that are managed by SDG&E under easements granted prior to land acquisition by the federal government. The analysis will need to disclose how circuits within the existing easements that are included in the proposed action will be managed. We would also like to discuss how the Sunrise mitigation land donation program will effect this situation. Several of the parcels that are in the mitigation package will have SDG&E facilities under easement, and title will likely transfer during the evaluation of the MSUP.

SDG&E Response:

To provide a detailed analysis of easements on USFS lands, SDG&E requests that the USFS identify the assessor's parcel numbers for the acquired lands in question. Where an SDG&E easement predates USFS administration for a parcel, SDG&E will operate and maintain these facilities under the Natural Community Conservation Plan consistent with existing standard operational protocols. All 69 kV power line and 12 kV distribution line facilities on USFS-administered properties under expired permits and included as part of the MSUP will be managed under the final O&M Plan adopted in connection with the MSUP.

Existing facilities located on properties that will be transferred to the USFS as part of the Sunrise Powerlink mitigation land donation program will have easements in place in favor of SDG&E prior to transfer.

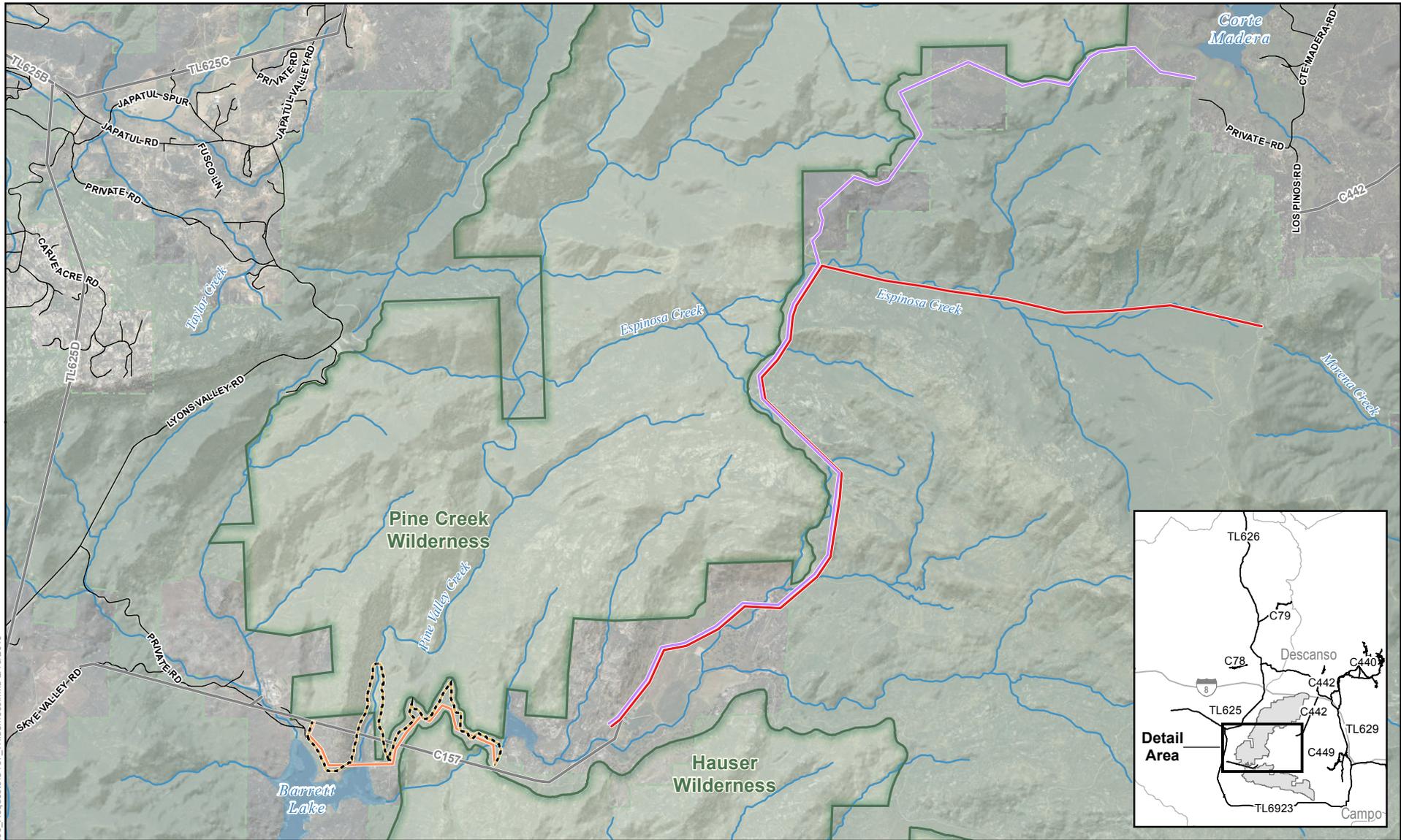


Figure 3: C157 Potential Relocation Alternatives

USFS MSUP/CNF Power Line Replacement Projects

Potential Relocation Alternatives*

- Overhead between Wilderness Areas
- Overhead from C442 (Corte Madera Ranch)
- Overhead from C442 (Los Pinos)
- Underground along Skye Valley Road

— Proposed Action/Current Alignment

□ Wilderness Boundary**

■ United States Forest Service

— Road

~ Stream

● Lake

*This map illustrates potentially constructible alternatives identified by SDG&E at the request of USFS. The feasibility of these potential alternatives has not been confirmed, and SDG&E does not propose to construct any of these alternatives at this time. **Wilderness Boundary based on GIS data downloaded from USFS at <http://fsgedata.fs.fed.us/vector/srs.php> per USFS staff direction on January 16, 2013. Note: SDG&E is currently reviewing other historical maps to confirm wilderness boundaries.

Source: SDG&E, 2013; USFS, 2013



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Question #3

GIS data – the data provided as part of the POD is slightly different than the previous data provided by SDGE. We noted the difference in access roads in the section 7.0.0 comments. We also noticed that the data in the Mt. Laguna area seems to be missing existing underground circuits. The overhead circuits on the Trabuco Ranger District were also not included. Please review the data to ensure that all SDG&E facilities are included and that the locations are correct.

SDG&E Response:

As described previously in the response to 7.0.0 Access Roads Question #3, the current access road inventory is based on extensive fieldwork conducted in recent years to develop a complete inventory. Because it is possible that mapping errors or gaps in access may be found, SDG&E will work with the USFS to update this information and establish new access roads if necessary.

The previous dataset provided to the USFS in support of the Proposed Action did not include existing overhead facilities in the Trabuco Ranger District or existing underground facilities in the vicinity of Mount Laguna. These areas have been included in the updated dataset and will be provided to the USFS.

Question #4

Applicant Proposed Measures (APM) – It would be very helpful to have one consolidated document that lists all APMs described in the POD.

SDG&E Response:

Attachment B: Applicant-Proposed Measures (APMs) provides a list of all APMs described in the Preliminary POD, as revised according to comments previously received in the CPUC's October 4, 2012 Pre-Filing Review letter and December 20, 2012 Completeness Review Data Request letter.

ATTACHMENT A: LAND MANAGEMENT PLAN POLICY CONSISTENCY ANALYSIS

ATTACHMENT A: LAND MANAGEMENT PLAN (LMP) POLICY CONSISTENCY ANALYSIS

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p><i>Goal 7.1 – Retain natural areas as a core for a regional network while focusing the built environment into the minimum land area needed to support growing public needs. (LMP Part 1)</i></p> <p>Facilities supporting urban infrastructure needs are clustered on existing sites or designated corridors, minimizing the number of acres encumbered by special-use authorizations. Special-uses serve public needs, provide public benefits, and conform to resource management and protection objectives. All uses are in full compliance with the terms and conditions of the authorization. There is a low level of increase in the developed portion of the landscape as measured by road densities; in fact, over time, the built environment is shifted away from or designed to better protect resource values.</p>	<ul style="list-style-type: none"> • Utilities 	<p>Yes</p>	<p>The Proposed Action includes the removal of existing wood poles and installation of replacement weathered-steel poles at an approximately one-to-one ratio for San Diego Gas & Electric Company’s (SDG&E’s) 69 kilovolt (kV) power lines and 12 kV distribution lines. The Proposed Action will not introduce facilities supporting infrastructure needs into areas where those uses do not currently exist, nor would it expand those uses beyond what exists currently. Thus, all currently existing natural areas will be retained, and facilities will be “clustered on existing sites.”</p> <p>The Proposed Action will utilize existing rights-of-way (ROWs) and alignments to avoid and minimize impacts to undisturbed areas. The steel poles would typically be placed in line with the existing conductors and within eight feet of the existing wood poles, except where sensitive resources were identified and avoided during preliminary design.</p> <p>In addition to retaining natural areas, the Proposed Action will allow some natural areas to be reclaimed, including the following:</p> <ul style="list-style-type: none"> • Distribution line or circuit (C) 78 would be relocated from an overland route to a route along Viejas Grade Road. • The C79 overland route would be removed and a new underground route would be located within Lookout Road from State Route (SR-) 79 to the Cuyamaca Peak communication site. • Several overhead portions of C440 would be removed and placed underground within Sunrise Highway and Laguna Campground. Approximately 0.24 mile of new 12 kV distribution line would be installed overhead along C440 to connect a segment of the replaced distribution line with the new underground line along Sunrise Highway. • Portions of C449 would be removed and an underground segment would be installed within Buckman Springs Road and Morena Stokes Road. A portion of the removed overland route for C449 would be relocated to more closely follow Morena Stokes Road to Camp Morena. 	<p>Section 2 – Purpose and Need</p>

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p><i>Lands 2 – Non-Recreation Special Use Authorizations (LMP Part 2)</i></p> <ul style="list-style-type: none"> Administer existing special-use authorizations in threatened, endangered, proposed and candidate species habitats to ensure they avoid or minimize impacts to threatened, endangered, proposed and candidate species and their habitats, cultural and scenic resources, and open space values. Efficiently administer special-use authorizations (SUAs) on National Forest System lands. Work with special-use authorization holders to better administer National Forest System land and to reduce administrative cost. Require special-use authorizations to maximize opportunities to co-locate facilities and minimize the encumbrance on National Forest System land. For special-use authorization holders operating within threatened, endangered, proposed and candidate species key and occupied habitats develop and provide information and education on the ways to avoid and minimize effects on their activities on occupied threatened, endangered, proposed and candidate species habitat. Use signing, barriers, or other suitable measures to protect threatened, endangered, proposed and candidate species in key and occupied habitats within the special-use authorization areas. 	<ul style="list-style-type: none"> Biological Resources Utilities 	Yes	<p>The Proposed Action includes several mechanisms to promote the efficient administration of the special use authorizations consistent with this LMP policy. The primary purpose of the Proposed Action is to combine over 70 prior use authorizations and easements into one Master Special Use Permit (MSUP) with uniform conditions and operations and maintenance (O&M) requirements throughout the CNF. Approval of the MSUP advances this LMP goal by providing efficient administration of multiple prior special use authorizations and improved administration of National Forest System land, reducing administrative costs. In addition, the Proposed Action would require SDG&E to continue to implement the Natural Community Conservation Plan (NCCP) and ensure consistency with applicable laws and regulations to minimize and avoid potential impacts to special-status species and their habitats. SDG&E has successfully implemented the NCCP in close coordination with the United States (U.S.) Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (formerly California Department of Fish and Game) (CDFW) for construction and O&M activities within sensitive habitats for nearly two decades. The NCCP includes suitable measures to protect species within the special use authorization areas. In addition to the NCCP, implementation of the O&M Plan and Fire Plan will also include consistent requirements that will improve efficiency and reduce administrative costs.</p>	<p>Section 2 – Purpose and Need Section 10.1 Biological Resources</p>
<p>S42: Include provisions for raptor safety when issuing permits for new power lines and communication sites (see guidelines in [Forest Plan] Appendix G). Also implement these guidelines for existing permits within one year in identified high-use flyways of the California condor, and within five years in other high-use raptor flyways. Coordinate with California Department of Fish and Game, U.S. Fish & Wildlife Service, and power agencies to identify high-use flyways. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>All 69 kV power lines and 12 kV distribution lines would be constructed in compliance with the Avian Power Line Interaction Committee’s (APLIC’s) Suggested Practices for Avian Protection on Power Lines. In addition, SDG&E would also implement its internal avian protection guidelines to reduce potential impacts to avian species from line strikes and electrocutions in these areas. All of the existing wood poles within the administrative boundary of the Cleveland National Forest (CNF) were previously surveyed to identify those that would require additional avian protection measures. Many of the poles within the CNF that were determined to require avian protection have been retrofitted to include the necessary avian protection measures, and the Proposed Action replacement poles would include the same or similar protections as the retrofitted poles and would fully comply with APLIC guidelines. SDG&E would coordinate with the USFS, CDFW, and USFWS to identify high-use flyways and implement appropriate measures.</p>	<p>Section 2 – Purpose and Need</p>
<p>S5: Treat all freshly cut live or recently dead conifer stumps with a registered fungicide to prevent the establishment of annosus root disease. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>SDG&E would treat all freshly cut live or recently dead coniferous stumps with a registered fungicide.</p>	<p>Section 10.1 Biological Resources</p>

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p>S9: Design management activities to meet the Scenic Integrity Objectives (SIOs) shown on the Scenic Integrity Objectives Map. (LMP Part 3)</p>	<ul style="list-style-type: none"> Visual Resources 	<p>Yes</p>	<p>The Visual Resources Technical Report includes a detailed impact evaluation supported by a set of computer-generated visual simulations, and concludes that the Proposed Action would result in only minor, incremental changes that would not affect the intact appearance of the landscape setting within the CNF. The Visual Resources Technical Report also provides applicant-proposed measures (APMs), which have been included in the Preliminary POD, to address potential impacts to aesthetics as a result of the Proposed Action. With the implementation of these APMs, the visual change would be consistent with the USFS visual management goals for the CNF and will meet the SIOs. Therefore, a decrease of more than one SIO level is not anticipated.</p> <p>A comparison of the existing views and visual simulations for the 69 kV power lines and 12 kV distribution lines demonstrates that the components would not result in a noticeable change in visual contrast with regard to line, form, or color. These simulations also indicate that the 69 kV power line and 12 kV distribution line components would not cause a perceptible deviation to the intactness of the existing landscape character. In addition, APM-AES-01 calls for restoring disturbed areas to reduce the potential visual contrast with the surrounding landscape setting. The use of non-reflective conductors and self-weathering, rust-colored poles (as described in APM-AES-03 and APM-AES-04) will further reduce visual contrast and potential visibility.</p> <p>SDG&E is currently working to identify potential relocation options for C157 at the request of the USFS. However, where this 12 kV distribution line crosses through the Pine Creek and Hauser wilderness areas, the landscape setting does not appear unaltered and, therefore, the area does not currently achieve the SIO “Very High” visual management goal. If C157 were to remain in its current location, the existing poles would be replaced with slightly taller poles of a similar line, form, and color, and the resulting effect would not substantially alter the landscape’s appearance of intactness.</p> <p>At several other locations, including along portions of C449 and C79, the Proposed Action includes the removal of existing 12 kV distribution structures. The removal of these existing structures would result in a noticeable improvement to the existing landscape character, view, and intactness of the landscape setting. In addition, APM-AES-05 includes aesthetic restoration through recontouring and revegetation in a manner that replicates the color and texture of the surrounding landscape in order to reduce the visual contrast of these areas.</p>	<p>Section 10.7 Visual Resources</p>
<p>S10: Scenic Integrity Objectives will be met with the following exceptions:</p> <ul style="list-style-type: none"> Minor adjustments not to exceed a drop of one SIO level is allowable within the Forest Supervisor's approval. Temporary drops of more than one SIO level may be made during and immediately following project implementation providing they do not exceed three years in duration. (LMP Part 3) 	<ul style="list-style-type: none"> Visual Resources 	<p>Yes</p>	<p>As outlined previously and detailed in the Visual Resources Technical Study, the pole replacements would result in minor, incremental changes that would not affect the intact appearance of the landscape setting within the CNF. Therefore, a decrease in more than one SIO level is not anticipated.</p>	<p>Section 10.7 Visual Resources</p>

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p>S11: When occupied or suitable habitat for a threatened, endangered, proposed, candidate or sensitive (TEPCS) species is present on an ongoing or proposed project site, consider species guidance documents (see Appendix H) to develop project-specific or activity-specific design criteria. This guidance is intended to provide a range of possible conservation measures that may be selectively applied during site-specific planning to avoid, minimize or mitigate negative long-term effects on threatened, endangered, proposed, candidate or sensitive species and habitat. Involve appropriate resource specialists in the identification of relevant design criteria. Include review of species guidance documents in fire suppression or other emergency actions when and to the extent practicable. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>As noted above, the Proposed Action includes implementation of the NCCP, which includes conservation measures that are applied during site-specific planning to avoid, minimize, or mitigate negative long-term effects on species and habitat. In addition, the “Pre-Activity Survey Report” process set forth in the NCCP ensures coordination with the USFWS and CDFW resource specialists in the identification of relevant design criteria. Because the Proposed Action involves the wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines within existing ROWs, and with the implementation of the NCCP protocols, SDG&E does not anticipate negative long-term effects on special-status species. SDG&E would include a review of species guidance documents in fire suppression or other emergency actions when and to the extent practical.</p>	<p>Section 10.1 Biological Resources</p>
<p>S12: When implementing new projects in areas that provide for threatened, endangered, proposed, and candidate species, use design criteria and conservation practices (see Appendix H) so that discretionary uses and facilities promote the conservation and recovery of these species and their habitats. Accept short-term impacts where long-term effects would provide a net benefit for the species and its habitat where needed to achieve multiple-use objectives. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>The Proposed Action includes wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines; SDG&E would continue to implement the approved NCCP to ensure impacts to special-status species would be minimized during construction as well as operation and maintenance activities.</p>	<p>Section 10.1 Biological Resources</p>
<p>S18: Protect known active and inactive raptor nest areas. Extent of protection will be based on proposed management activities, human activities at the onset of nesting initiation, species, topography, vegetative cover, and other factors. When appropriate, a no-disturbance buffer around active nest sites will be required from nest-site selection to fledging. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>As discussed in Section 10.1 Biological Resources of the POD, SDG&E would utilize NCCP protocols 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 17, 20, 24, 25, 27, 29, 34, 35, 41, 44, 48, 50, 54, 55, and 57 to avoid impacts to special-status avian species and nesting avian species. These protocols include, but are not limited to, restricting vehicles to existing roads when feasible, conducting pre-activity nest surveys, utilizing biological resource monitors, and avoiding nesting season to the extent practicable.</p>	<p>Section 10.1 Biological Resources</p>
<p>S22: Except where it may adversely affect threatened and endangered species, linear structures such as fences, major highways, utility corridors, bridge upgrades or replacements, and canals will be designed and built to allow for fish and wildlife movement. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>The Proposed Action includes adoption of a Master Special Use Permit and wood-to-steel replacement of existing 69 kV power lines and 12 kV distribution lines within existing alignments. These activities would not affect fish and wildlife movement. Additionally, undergrounding C79 and portions of C440 and C449 would be beneficial to wildlife movement as the overhead segments in these areas would be placed underground and out of potential flyways.</p>	<p>Section 10.1 Biological Resources</p>
<p>S24: Mitigate impacts of on-going uses and management activities on threatened, endangered, proposed, and candidate species. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	<p>Yes</p>	<p>SDG&E will continue to implement the NCCP, which mitigates impacts of ongoing uses and management activities on species.</p>	<p>Section 10.1 Biological Resources</p>

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p>S30: Avoid activities that result in removal, crushing, burying, burning, or mowing of host plants within critical and occupied habitat for threatened, endangered, and proposed butterfly species; unless guided differently by a species-specific consultation. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>In order to avoid and minimize potential impacts to Quino checkerspot butterfly (<i>Euphydryas editha quino</i>), SDG&E would utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57. These protocols include, but are not limited to: training, pre-activity surveys, monitoring during clearing and grading activities, and reducing speeds to 15 miles per hour along Proposed Action access roads to minimize fugitive dust. The Proposed Action and all associated activities are also covered by the Quino Checkerspot Butterfly Habitat Conservation Plan (QCB HCP); as a result, SDG&E would also mitigate any potential Proposed Action effects to Quino checkerspot butterfly by implementing this HCP. Specifically, SDG&E would implement the protocols identified in HCP Sections 3.2 Actions to Minimize Impacts and 3.3 Actions to Mitigate Impacts, which include conducting pre-activity surveys, conducting protocol-level adult Quino checkerspot butterfly flight season surveys within suitable Quino checkerspot butterfly habitat within the HCP's designated Mapped Area prior to construction and submitting the 45-day Quino checkerspot butterfly Survey Results Report to the USFWS, and mitigating for impacted habitat. In the alternative, SDG&E has the option to not complete surveys but assume presence of the species and mitigate according to established ratios established in the QCB HCP. With implementation of the HCP and SDG&E's NCCP, any potential impacts to Quino checkerspot butterfly from the Proposed Action would be minimized.</p>	Section 10.1 Biological Resources
<p>S47: When designing new projects in riparian areas, apply the Five-Step Project Screening Process for Riparian Conservation Areas as described in Appendix E – Five-Step Project Screening Process for Riparian Conservation Areas. (LMP Part 3)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>As described in Section 10.4 Hydrology of the Preliminary POD, USFS-identified riparian conservation areas (RCAs) were identified and included for consideration during project design to avoid the construction of replacement steel poles within these areas, where possible. Additionally, SDG&E is working with the USFS to identify existing poles within RCAs that may have access roads that can be relocated or eliminated from these areas. In accordance with the USFS' CNF Land Management Plan Goal 5.2, SDG&E included these areas for consideration during project design and avoided, where possible, the placement of steel poles and temporary work areas within RCAs to the extent feasible. Where resource flagging and avoidance would not completely eliminate the potential for impacts to these resources, or where construction activities would be required to some extent within the mapped boundaries of a riparian area, SDG&E would implement project-specific APMs. The Proposed Action would temporarily impact approximately 8.76 acres of RCAs during construction, and would permanently impact approximately 0.05 acre of these areas from the construction of the replacement steel poles. These temporary and permanent impacts would be minor in the context of approximately 62,725 acres of identified RCAs within the Proposed Action area.</p>	Section 10.1 Biological Resources
<p>S60: Until proper evaluation occurs, known heritage resource sites shall be afforded the same consideration and protection as those properties evaluated as eligible to the National Register of Historic Places. (LMP Part 3)</p>	<ul style="list-style-type: none"> Cultural Resources 	Yes	<p>Known heritage resource sites would be treated as potentially eligible to the National Register of Historic Places until proper evaluation occurs.</p>	Section 10.2 Cultural Resources

LMP Policy	Applicable Resource Area	Consistency (Yes/No)	Explanation	Location in the Preliminary Plan of Development (POD)
<p>S61: Leave human remains which are not under the jurisdiction of the County Coroner undisturbed unless there is an urgent reason for their disinterment. In case of accidental disturbance of human remains, excavation of human remains, or subsequent re-internment of human remains follow national forest, federal and tribal policies. (LMP Part 3)</p>	<ul style="list-style-type: none"> Cultural Resources 	Yes	<p>Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, all operations within 50 feet of an inadvertent discovery during such activities will cease and the Principal Investigator will contact the USFS Heritage Program Manager (HPM) and SDG&E's Cultural Resource Specialist. Once the a find has been identified and evaluated, the USFS HPM and SDG&E's Cultural Resources Specialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are required treatment. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the USFS HPM and after the appropriate consultation has taken place.</p>	Section 10.2 Cultural Resources
<p>CNF S6 – Place new power lines (33 kV or less), telephone lines, and television cables underground wherever possible. (LMP Part 2)</p>	<ul style="list-style-type: none"> Utilities 	Yes	<p>The Proposed Action includes adoption of an MSUP for SDG&E facilities within the CNF, as well as the replacement of some of these existing facilities. No new power lines are proposed. Nonetheless, with respect to the replacement of the existing 12 kV facilities, the Proposed Action includes placement of C79 and portions of C440 and C449 underground.</p>	Section 4.3 12 kV Distribution Line Undergrounding
<p>CNF S9 – Avoid or mitigate, following consultation, activities resulting in direct trampling or erosion problems to Laguna Mountains skipper suitable and occupied habitat and adjacent areas (Laguna and Palomar Places). (LMP Part 2)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>As described in Section 10.1 Biological Resources of the POD, SDG&E would replace several poles within USFS-modeled occupied habitat for the Laguna Mountains skipper (<i>Pyrgus ruralis lagunae</i>) along C440. USFWS-designated critical habitat is also within the vicinity of C440. SDG&E has conducted extensive surveys within these areas and designed the Proposed Action to minimize the number of replacement poles to be constructed within these areas; SDG&E's survey data reveal that, in the currently planned pole construction locations, the likelihood of presence of the Laguna Mountains skipper is low. Although this species is not covered under SDG&E's NCCP, SDG&E would utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57. SDG&E's protocols are expected to result in the avoidance of effects to Laguna Mountains skipper. If pre-activity surveys determine that potential effects could occur, then SDG&E would work directly with the appropriate resource agencies.</p>	Section 10.1 Biological Resources
<p>CNF S13 – Avoid or mitigate activities that may negatively affect San Diego thornmint (<i>Acanthomintha ilicifolia</i>) occupied habitat (Sweetwater Place). (LMP Part 2)</p>	<ul style="list-style-type: none"> Biological Resources 	Yes	<p>The Proposed Action area is located within USFWS-designated critical habitat San Diego thornmint (<i>Acanthomintha ilicifolia</i>). San Diego thornmint is considered a Covered Species by SDG&E's NCCP. Therefore, with the implementation of the appropriate NCCP protocols, as described in Section 10.1 Biological Resources of the POD, impacts to San Diego thornmint would be minimized.</p>	Section 10.1 Biological Resources

ATTACHMENT B: APPLICANT-PROPOSED MEASURES (APMS)

ATTACHMENT B: APPLICANT-PROPOSED MEASURES (APMS)

San Diego Gas & Electric Company (SDG&E) would implement the following APMs to reduce potential impacts from the Cleveland National Forest Power Line Replacement Projects. Some of the APMs have been revised, which is shown in redline and strikethrough.

- APM-AIR-01: To the extent feasible, unnecessary construction vehicle and idling time would be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project would apply a “common sense” approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine would be shut off.
- APM-AIR-02: To control fugitive dust, SDG&E would apply water or non-toxic soil stabilizers on all unpaved access roads, staging areas, and other work areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; cover loads in haul trucks or maintain at least six inches of free-board when traveling on public roads; and apply non-toxic soil stabilizers or water to form and maintain a crust on inactive construction areas (disturbed work areas that are unused for four consecutive days).
- APM-AIR-03: Traffic speeds on unpaved roads would be limited to 15 miles per hour.
- APM-AIR-04: SDG&E would maintain construction equipment per manufacturing specifications and use low-emission equipment as follows: all off-road and portable construction diesel engines not registered under the California Air Resources Board Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower (hp) or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Section 2423(b)(1), unless such an engine is not available for a particular item of equipment. In the event that a Tier 2 engine is not available for any off-road engine larger than 100 hp, that engine shall be equipped with a catalyzed diesel particulate filter (soot filter), unless the engine manufacturer indicates that the use of such devices is not practical for that particular engine type.
- APM-CUL-01: Prior to construction, all SDG&E, contractor, and subcontractor personnel will receive training regarding the appropriate work practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural, archaeological, and paleontological resources and how to recognize possible buried resources. This training will include a presentation of the procedures to be followed upon discovery or suspected discovery of cultural and archaeological materials, including Native American remains and their treatment, as well as of paleontological resources.

- APM-CUL-02: Intensive pedestrian surveys will be conducted prior to construction in those areas within the rights-of-way for which initial survey access was not granted to determine the potential for impacts to cultural resources in these areas. Where possible, engineering design will be re-evaluated to determine whether facilities can be relocated to avoid any cultural resources identified from these additional surveys. If relocation is not feasible, APM-CUL-03 will be implemented to minimize impacts to sensitive cultural resources.
- APM-CUL-03: All potentially National Register-eligible or archaeologically sensitive sites, as defined in the Cultural Resources ~~Survey~~Technical Report, that will not be directly affected by construction but are within 50 feet of replacement pole locations will be designated as Environmentally Sensitive Areas (ESAs). Potentially eligible resources include those that are recommended eligible, as well as unevaluated sites. Protective fencing or other markers will be erected and maintained to protect these ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs will not be signed or marked as cultural, historical, or archaeological resources.
- APM-CUL-04: An archaeological or cultural monitor will be present during construction activities that occur within or adjacent to identified archaeological or cultural resource site boundaries, respectively, as identified in the Cultural Resources ~~Survey~~Technical Report, if the replacement pole requires a foundation or a larger hole than the existing wood pole location to be excavated to ensure conformance with prescribed avoidance measures. The monitor will identify potential archaeological or cultural resources that may be unexpectedly encountered during construction and will have the authority to divert or temporarily halt construction activities in the area of discovery ~~to allow the recovery of archaeological or cultural resources in a timely fashion.~~ When~~In the event that~~ archaeological or cultural resources are discovered, the monitor will ~~recover them in accordance with professional standards~~ stop work and notify the Principal Investigator (PI), who will inform SDG&E and the USFS Heritage Program Manager (HPM) of the stoppage. The archaeologist, in consultation with USFS HPM and SDG&E's Cultural Resource Specialist, will determine the significance of the discovered resources. The USFS HPM and SDG&E's Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, preservation in-place will be the preferred manner of mitigating for impacts. For resources that cannot be preserved in place, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts in consultation with the USFS HPM, the Tribes, and the SHPO. No collection of archaeological or cultural resources will occur on USFS property without prior USFS HPM consent. Daily logs will be kept by all monitors, and a monitoring report (with appropriate graphics), which described the results, analyses, and conclusions of the monitoring program, will be prepared at the conclusion of each phase of monitoring. Any new cultural sites or features encountered will be recorded with the South Coastal Information Center. Monitors will also identify and delineate an approved footpath through the archaeological and cultural resource sites for construction crews, as needed.

- APM-CUL-05: SDG&E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources ~~Survey~~ Technical Report, such as ~~limiting access road improvements in avoiding access road improvements within~~ culturally sensitive areas unless improvements are required for safety reasons; replacing new poles within the previously disturbed areas (two to four feet) ~~or~~ represented by the existing poles locations, where necessary, to avoid sensitive resources; and cutting existing poles off at grade level, where specified and landowner approval is provided. Same-hole replacement will also be utilized on a case-by-case basis. No new pole locations will be placed within cultural resource boundaries unless the appropriate consultation (including Section 106) has taken place. No temporary poles will be located within sites unless the appropriate consultation (including Section 106) has taken place.
- APM-CUL-06: In consultation with the USFS HPM, the Tribes, and the SHPO, SDG&E will develop a Cultural Resources Treatment Plan that includes procedures for protection and avoidance, evaluation and treatment, and the curation of any potentially register-eligible cultural materials ~~collected during construction~~. Specific protective measures, including a monitoring program, will be defined in the Cultural Resources Treatment Plan to reduce potential adverse impacts on unknown cultural resources to less-than-significant levels.
- APM-CUL-07: Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, All operations within 50 feet of an inadvertent discovery during ~~construction~~ such activities shall cease and the PI will contact the USFS HPM and SDG&E's eCultural rResource sSpecialist ~~will be contacted should any previously unidentified prehistoric or historic artifacts, indicators or examples of cultural, archaeological, or paleontological resources, or potential human remains be discovered during the course of site preparation, grading, excavation, construction, or other activities~~. Once the a find has been identified and evaluated, the USFS HPM and SDG&E's eCultural rResources sSpecialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are the required treatment ~~in consultation with the United States Forest Service~~. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the USFS HPM and after appropriate consultation has taken place.
- APM-CUL-08: A paleontological monitor will be present for excavation activities conducted at locations with underlying Potential Fossil Yield Classification Class 3 geologic deposits where new steel poles are unable to be installed in the same location as of that of the existing wood pole. In the event that fossils are unexpectedly encountered during construction, a qualified paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow the recovery of fossil remains in a timely fashion. When significant fossils are discovered, the paleontologist will recover them in accordance with professional standards. Fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and curated in a scientific institution with permanent paleontological collections. The paleontological monitor will follow the procedures outlined in the

Paleontological Monitoring and Treatment Plan, which will be prepared and will include information regarding pre-construction field surveys, construction personnel training, necessary permits, research design, monitoring methodology, fossil discovery and recovery protocols, fossil preparation and curation procedures, and the preparation of a final monitoring report.

- APM-HYD-01: All concrete washouts will be conducted either into excavations where the concrete was poured within designated concrete washout stations, or will be captured using a washout recycling system. Crews will not be allowed to dispose of concrete directly onto the ground.
- APM-HYD-02: When construction activities are required adjacent to flowing aquatic resources, sediment barriers will be placed between the work area and flowing water.
- APM-HYD-03: In areas where topsoil has not been salvaged, construction activities will be limited when the environmental monitor determines that the soil is too wet to adequately support vehicles and equipment. Where soil conditions are deemed too wet to work, one of the following measures will apply:
 - Access will be limited to the minimum area feasible for construction. Where possible, vehicles and equipment will be routed around wet areas so long as the re-route does not cross into sensitive resource areas.
 - If wet areas cannot be avoided and soil moisture is too high to strip topsoil, BMPs—including the use of wide-track or low ground pressure equipment or installation of prefabricated equipment pads or timber mats—will be implemented for use in these areas to minimize rutting and off-site sedimentation.
- APM-HYD-04: Any areas not surveyed for potentially jurisdictional wetlands or waters due to limited access will be surveyed prior to the start of construction activities and potential impacts will be assessed.
- APM-NOI-01: SDG&E will provide notice of the construction schedule to all property owners within 300 feet of the Proposed Action by mail at least one week prior to the start of construction activities. The announcement will state the construction start date, anticipated completion date, and hours of operation, as well as a telephone number to call with questions or complaints during construction.
- APM-NOI-02: Operating equipment will be positioned to maximize the distance to residences and to maintain safe and effective operation.
- APM-NOI-03: All internal combustion engine-driven equipment will be equipped with exhaust mufflers that are in good condition and meet or exceed the manufacturer's specifications. All equipment will be maintained and tuned according to manufacturer recommendations.

- APM-NOI-04: When backup alarms have more than one loudness setting, they will be set to the lowest setting that meets Occupational Safety and Health Administration safety requirements.
- APM-NOI-05: When located within 80 feet of residences, a temporary noise barrier with an effective height of approximately three feet will be placed between residences and stationary noise-generating equipment during use. The effective height is that of the barrier above the line-of-sight between the noise source and the noise-sensitive receiver.
- APM-NOI-06: Helicopters will be required to maintain a height of at least 500 feet when passing over residential areas, except when at temporary construction areas or actively assisting with conductor stringing. All helicopters will be required to maintain a lateral distance of at least 500 feet from all schools.
- APM-NOI-07: Residents who experience construction noise levels that exceed the applicable noise thresholds will be temporarily relocated, on an as-needed basis, for the duration of the activities that will impact them.
- APM-AES-01: When construction has been completed, all temporary work areas will be restored to near pre-construction conditions in accordance with landowner agreements, in order to reduce potential visual contrast with the surrounding landscape setting.
- APM-AES-02: Construction activities will be kept as clean and inconspicuous as practical. Where practical, construction storage and staging will be screened from close-range residential views with opaque fencing.
- APM-AES-03: Non-specular conductors will be installed for new and replacement conductors along the electric line alignments in order to minimize the reflectivity and general visibility of new electric line facilities.
- APM-AES-04: New and replacement poles to be installed along the electric line alignments will be reddish-brown, weathered-steel that will appear similar in color to existing wood poles seen in the Proposed Action area and will blend in with the surrounding landscape backdrop.