

Sycamore–Peñasquitos  
230-kV Transmission  
Line Project  
Addendum to the  
Final Environmental  
Impact Report

SCH# 2014081031



May 2019



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# Sycamore–Peñasquitos 230-kV Transmission Line Project

## **Addendum to the Final Environmental Impact Report**

**SCH# 2014081031**

**May 2019**



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# 1 INTRODUCTION

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## 1.1 BACKGROUND

San Diego Gas & Electric Company (SDG&E), a regulated California utility, filed an application (Application A. 14-04-011) for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the Sycamore-Peñasquitos 230 Kilovolt (kV) Transmission Line Project (Project) on April 7, 2014. The CPUC prepared an Environmental Impact Report for the Project in compliance with the requirements of the California Environmental Quality Act (CEQA). The CPUC adopted the Final Environmental Impact Report (FEIR) (State Clearinghouse No. 2014081031) and approved Alternative 5 (approved Project) on October 13, 2016 in Decision 16-10-005. Project construction began on January 4, 2017 and the transmission line was energized on August 30, 2018. The CPUC approved Project is shown on Figure 1.2-1.

During final engineering for the approved Project, SDG&E determined that it needed to re-tension an approximately 2-mile-long segment of an existing 230-kV transmission line to achieve proper conductor tension needed for the Project and approve proper line clearance and load with varying wind, temperature and weather conditions. SDG&E filed request for Minor Project Refinement (MPR) #8 to the CPUC on September 12, 2017, to request CPUC approval to re-tension the 2-mile long segment of existing 230-kV transmission line consistent with requirements for conductor clearance. The CPUC reviewed MPR#8 and determined that a the work space for the proposed re-tensioning activities would be located outside of the geographic boundaries of the EIR study area for the Project; therefore, SDG&E required a Petition for Modification (PFM) of the approved Project.

SDG&E filed a PFM of Decision 16-10-005 on January 23, 2019 to allow re-tensioning of 2 miles of the existing 230-kV transmission line, south of the approved Project boundary (Proposed Project Modification). The Proposed Project Modification location is shown on Figure 1.2-1. SDG&E filed a Proponent's Environmental Assessment (PEA) with the PFM. The PEA was revised in February 2019 to address CPUC request to address changes in CEQA Guidelines in addition to the significance criteria included in the FEIR. The information provided in this Addendum reflects the CPUC's independent review of the PEA and information filed by SDG&E in the PFM.

## 1.2 CEQA COMPLIANCE

This Addendum has been prepared in accordance with the requirements of CEQA in response to SDG&E's filing of a PFM to CPUC decision 16-10-005. The Addendum, if approved, would modify the previously certified EIR prepared for the Project. After certification of the FEIR, the

## 1 INTRODUCTION

State of California Natural Resources Agency adopted updates to CEQA Guidelines that included changes to Appendix G. This Addendum generally relies on the FEIR for determining significance; however, sections related to wildfire, energy, and tribal resources are included to address the changes in CEQA Guidelines, and paleontological resources is presented within the context of geology and soils consistent with changes in Appendix G. Changes to other resources areas were also reviewed by the CPUC.

When an EIR has been certified for a project and further discretionary approval on that project is not required, CEQA Guidelines (Public Resources Code § 21166; CEQA Guidelines §15162[a]) define that preparation of a subsequent or supplemental EIR is not required unless the lead agency determines, on the basis of substantial evidence in light of the whole record that:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

The PFM of Decision 16-10-005 represents a minor change to the approved Project to allow re-tensioning of an existing transmission line in an area that was not analyzed in the previous EIR. The minor change to the Project does not involve new significant impacts or a substantial increase in the severity of significant impacts and none of the changes to CEQA Guidelines would result in a new significant impact. This EIR Addendum provides substantial evidence to support the CPUC's decision to prepare an Addendum and not a Subsequent EIR.

## 1 INTRODUCTION

CEQA Guidelines Section 15164(c) states that “an Addendum need not be circulated for public review.” There is no public comment period required in connection with an Addendum. While public circulation of an Addendum is not required, the CPUC has made this EIR Addendum available to the public on the Project website at:

[http://www.cpuc.ca.gov/Environment/info/panoramaenv/Sycamore\\_Penasquitos/index.htm](http://www.cpuc.ca.gov/Environment/info/panoramaenv/Sycamore_Penasquitos/index.htm)

# 1 INTRODUCTION

Figure 1.2-1 Approved Project and Proposed Project Modification Area



## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

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### 2.1 PROPOSED PROJECT MODIFICATION LOCATION

The Proposed Project Modification is located south of Carroll Canyon Road and east of Interstate 805 (I-805) and extends approximately 2 miles south of the western cable pole at the end of the Sycamore-Peñasquitos 230-kV transmission line underground segment. The Proposed Project Modification area is located in western San Diego County, within the City of San Diego and partially within Marine Corps Air Station (MCAS) Miramar. Figure 1.2-1 shows the location of the Proposed Project Modification. Detailed maps of the Proposed Project Modification work areas are provided in Appendix A.

The Proposed Project Modification is located entirely within SDG&E's existing right-of-way (ROW). SDG&E holds easements to cover all access roads and work areas required for the Proposed Project Modification. No additional ROW would be necessary for the Proposed Project Modification.

### 2.2 PROPOSED PROJECT MODIFICATION ACTIVITIES

#### 2.2.1 Overview

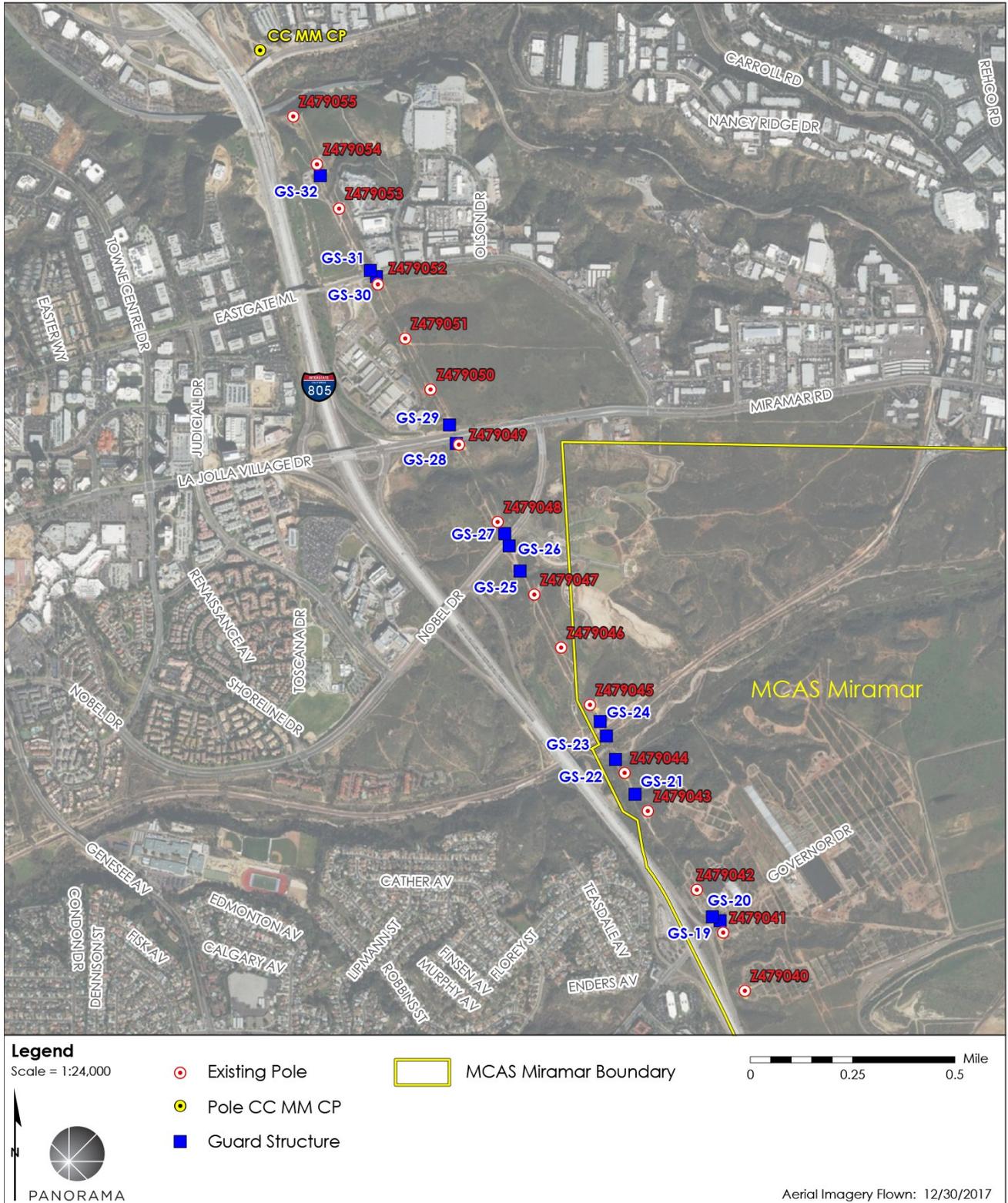
The Proposed Project Modification would not change the Sycamore-Peñasquitos 230-kV transmission line, which was energized in 2018. The Proposed Project Modification consists of re-tensioning a 2-mile long segment of an existing 230-kV transmission line. The re-tensioning activities would be conducted from existing pole access pads and SDG&E access roads. Temporary guard structures would also be installed to protect utility line roadways within the Proposed Project Modification area during the re-tensioning activities. The existing poles and proposed guard structures that are included in the Proposed Project Modification are shown on Figure 2.2-1.

#### 2.2.2 Temporary Work Areas

The Proposed Project Modification includes temporary work areas around 16 existing 230-kV tubular steel poles and at 14 proposed guard structures. Access to the existing 230-kV poles is needed to provide the necessary work space for crews to unclip, pull, and reclip the existing conductor between structures Z479040 and Z479055. Dimensions, property owner information, and description of land cover for each pole access area and guard structure location is summarized in Table 2.2-1 and Table 2.2-2, respectively. Temporary work area locations are shown on Figure 2.2-1.

## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

**Figure 2.2-1 Proposed Project Modification Activity Locations**



## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

**Table 2.2-1 Temporary Work Areas at Poles**

Temporary Work Area	Acres	Dimensions (feet)	Vegetation/Land Cover	Property Owner
Z479040	0.33	183 x 199	Bare ground	MCAS Miramar
Z479041	0.26	121 x 92	Bare ground and landscape/ornamental vegetation	MCAS Miramar
Z479042	0.24	97 x 106	Bare ground	MCAS Miramar
Z479043	0.12	120 x 91	Disturbed vegetation	MCAS Miramar
Z479044	0.10	38 x 136	Disturbed vegetation	MCAS Miramar
Z479045	0.16	134 x 199	Disturbed vegetation	MCAS Miramar
Z479046	0.08	45 x 159	Disturbed vegetation	MCAS Miramar
Z479047	0.16	120 x 164	Disturbed vegetation	MCAS Miramar
Z479048	0.21	107 x 217	Disturbed vegetation and non-native grasses	MCAS Miramar
Z479049	0.14	128 x 108	Disturbed vegetation	MCAS Miramar
Z479050	0.18	114 x 212	Disturbed vegetation	MCAS Miramar
Z479051	0.25	77 x 198	Disturbed vegetation	MCAS Miramar
Z479052	0.09	123 x 90	Disturbed vegetation	MCAS Miramar
Z479053	0.22	117 x 121	Disturbed vegetation	Eastgate Industrial Center Owners Association, Inc.
Z479054	0.10	50 x 134	Disturbed vegetation	Eastgate Industrial Center Owners Association, Inc.
Z479055	0.06	66 x 69	Disturbed vegetation	Eastgate Industrial Center Owners Association, Inc.

Source: (SDG&E, 2018)

## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

**Table 2.2-2 Temporary Work Areas for Guard Structures**

Guard Structure	Acres	Dimensions (Feet)	Vegetation/Land Cover	Property Owner
GS-19	0.04	75 x 25	Bare ground and pavement	MCAS Miramar
GS-20	0.04	75 x 25	Bare ground and pavement	MCAS Miramar
GS-21	0.03	54 x 30	Bare ground	MCAS Miramar
GS-22	0.05	52 x 80	Bare ground	MCAS Miramar
GS-23	0.03	50 x 25	Bare ground	San Diego Metropolitan Transit Development Board
GS-24	0.03	50 x 25	Bare ground	MCAS Miramar
GS-25	0.02	26 x 26	Bare ground	MCAS Miramar
GS-26	0.03	50 x 25	Bare ground	MCAS Miramar
GS-27	0.04	75 x 30	Disturbed vegetation	MCAS Miramar
GS-28	0.002	10 x 10	Disturbed vegetation	MCAS Miramar
GS-29	0.03	50 x 25	Bare ground	MCAS Miramar
GS-30	0.04	50 x 58	Disturbed vegetation	MCAS Miramar
GS-31	0.03	50 x 25	Disturbed vegetation	Eastgate Industrial Center Owners Association, Inc.
GS-32	0.03	50 x 25	Disturbed vegetation	Eastgate Industrial Center Owners Association, Inc.

Source: (SDG&E, 2018)

### 2.2.3 Conductor Tension and Sag Adjustment

SDG&E would use bucket trucks and a wire tensioner to adjust the existing conductor to the proper tension and sag specifications. Workers would unclip, pull, and reclip the existing conductor to adjust the tension and sag of the conductor.

### 2.2.4 Guard Structures

Guard structures (GS-19 through GS-32) would be installed to protect roadways, a railway, and distribution lines located underneath the existing 230-kV transmission line. The guard structures are necessary to prevent an accidentally-dropped conductor from contacting pedestrians, vehicles, or utilities (e.g., distribution lines and communication facilities) located beneath the conductor. Guard structures would be installed using one of four means described below:

1. **Bucket truck staged under transmission line.** A bucket truck would be staged under the transmission line to protect resources located under the transmission line. The line would fall on the bucket truck rather than the road, railway, or distribution line.

## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

2. **Two poles on either side of the transmission line, directly buried into the ground.** A two-man crew with a truck-mounted auger or hand tools, including a jack hammer and compressor, would excavate two holes on either side of the transmission line. The holes would be approximately 2 to 3 feet in diameter and 6 to 8 feet deep. Poles would be installed with a line truck and excavated soil would be backfilled around the poles. An additional pole would be installed across the top of the two poles to protect resources. Upon completion of the re-tensioning work, the poles would be completely removed from the ground and soils would be contoured to pre-existing conditions. If additional backfill material is required for the pole hole after it is removed, clean decomposed granite would be used as backfill.
3. **Two poles on either side of the transmission line, “flower pot” method.** The “flower pot” method consists of installing an approximately 5-foot by 5-foot by 4-foot precast concrete base that holds up a temporary pole. The flower pot sits on level ground surface and no additional ground disturbance is needed for this type of installation. The poles would be installed on either side of the area to be protected.
4. **Protective material installed on distribution lines.** A bucket truck would be used to install rubber insulating blankets on distribution line crossings underneath the transmission line to protect the transmission line from being energized in the event it was to touch the energized distribution line.

No foundations would be required, and no grading would occur for installation of guard structures. Guard structure installation is estimated to take 3 to 5 days to complete in total. All guard structure locations would be accessed via existing dirt or paved access roads. Guard structures would be removed at the completion of Proposed Project Modification activities.

### 2.2.5 Access Roads

SDG&E would use existing access roads for the Proposed Project Modification. No new access roads are required as part of the Proposed Project Modification.

### 2.2.6 Vegetation Removal

Minor vegetation/brush clearing and trimming is proposed as needed along access roads, temporary work areas at existing pole access pads, and at guard structures to minimize potential fire risk and facilitate equipment/vehicle access. Trimming of vegetation may also be necessary for placement of outriggers and/or direct buried poles. No grading would be required.

### 2.2.7 Erosion and Sediment Control and Pollution Prevention During Construction

SDG&E would obtain coverage for the Proposed Project Modification under the Construction General Permit through a Change of Information to the existing Storm Water Pollution Prevention Plan (SWPPP) for the Project. SDG&E would implement best management practices (BMPs). The BMPs installed at proposed work areas would be consistent with the SWPPP and

## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

the SDG&E Subregional Natural Communities Conservation Plan (NCCP), which also identifies protocols for minimizing potential erosion and sedimentation.

### 2.2.8 Site Cleanup, Waste Disposal, and Post-Construction Restoration

All Proposed Project Modification areas would be maintained in an orderly and clean condition as required by Project APMs and MMs. All trimmed vegetation would be removed from the area and properly disposed of. All SDG&E operational protocols would be implemented, and equipment and materials would be removed from the Proposed Project Modification area upon completion of work.

SDG&E would restore all areas of sensitive vegetation that are temporarily disturbed by the Proposed Project Modification Activities, in accordance with the Project's Habitat Restoration Plan. The Habitat Restoration Plan acknowledges the potential for minor changes in impact areas and requires preparation of a Post-Construction Report to confirm actual impacts at each work area. The Habitat Restoration Plan includes provisions for restoration of temporary impacts on the sensitive vegetation communities that could be affected by the Project.

### 2.2.9 Traffic Management

The Proposed Project Modification access routes would include Governor Drive, Nobel Drive, Miramar Road, and Eastgate Mall. SDG&E would implement standard traffic control methods where the Proposed Project Modification crosses public-access roadways and railroads. Temporary lane closures may be necessary during guard structure installation adjacent to roadways.

### 2.2.10 Workforce and Equipment

Several crews of up to five personnel would conduct overhead work on the poles. Construction would be completed using as the equipment listed in Table 2.2-3.

**Table 2.2-3 Construction Equipment**

Equipment	Quantity
Bucket trucks	2
Cranes	2
Caterpillar tractor (bulldozer)	1
Transmission line trucks	2
Flatbed trailer	1
Tractor/trailer unit	1
Framers	4
Water truck	1
Passenger vehicles	3 to 5

Source: (SDG&E, 2018)

## **2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION**

### **2.2.11 Construction Workforce and Schedule**

Work associated with this Proposed Project Modification would last approximately 2 weeks. The estimated crew size would be approximately 15 workers per day. Work would be conducted Monday through Saturday during daylight hours for approximately 8 hours per day.

### **2.3 OPERATION AND MAINTENANCE**

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

### **2.4 APPLICANT PROPOSED MEASURES AND MITIGATION MEASURES**

SDG&E would implement all application Applicant Proposed Measures (APMs) and mitigation measures (MMs) listed in Table 9.1-1 of the FEIR during the Proposed Project Modification activities.

## 2 DESCRIPTION OF PROPOSED PROJECT MODIFICATION

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### 3 ENVIRONMENTAL ANALYSIS

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#### 3.1 INTRODUCTION TO ENVIRONMENTAL ANALYSIS

The purpose of this EIR Addendum is to document proposed modifications to the approved Project and the impacts of those modifications. This EIR Addendum is limited to describing the types of impacts/mitigations that would be associated with re-tensioning an approximately 2-mile long segment of existing 230-kV transmission line. The modifications and associated impacts are identified under each environmental discipline in this EIR Addendum.

This EIR Addendum provides a significance determination for each of the Proposed Project Modification impacts, identifies APMs and mitigation measures from the FEIR that would apply to Proposed Project Modification impacts, and includes a conclusion on whether the Proposed Project Modification would result in any new or more severe impacts on the environmental resource and whether further mitigation would be necessary.

As discussed in this section, the analysis in this EIR Addendum supports the conclusion that the Proposed Project Modification would create no new or more severe impacts and no new mitigation measures would be required to reduce impacts to less-than-significant levels beyond those presented in the FEIR.

#### 3.2 AESTHETICS

##### 3.2.1 Environmental Setting

The Proposed Project Modification area is not visible from any scenic highways or vistas. The Proposed Project Modification is located in SDG&E's ROW, which includes existing utilities and transmission lines.

##### 3.2.2 Environmental Impacts and Mitigation

The approved Project impacts on aesthetics and applicable APMs and mitigation measures were analyzed in Section 4.2.13 of the FEIR. The CPUC determined that the approved Project would have a significant and unavoidable impact on aesthetics.

###### 3.2.2.1 Impact on Visual Quality

The Proposed Project Modification involves re-tensioning an existing 230-kV transmission line. Construction equipment and vehicles would be visible in the Proposed Project Modification area (refer to Table 2.2-3) for approximately 2 weeks to conduct the work. Fourteen guard structures would also be installed. Guard structures would be in place for a maximum of 14 days (2 weeks). SDG&E would not install any permanent structures. The visual impact of construction equipment and guard structures would be short-term and would appear visually

### 3 ENVIRONMENTAL ANALYSIS

similar to equipment that would be used for operation and maintenance of the existing transmission line. The impact on visual quality from the temporary activities would be less than significant.

#### 3.2.2.2 Impact from Light and Glare

The Proposed Project Modification activities would be conducted during daytime hours and the modification would not create a new source of light. No infrastructure would be installed that could create a source of glare. The Proposed Project Modification would have no impact on light or glare in the area.

#### 3.2.3 Conclusion

Aesthetic impacts would be temporary and less than significant. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on aesthetics.

### 3.3 AGRICULTURE AND FORESTRY RESOURCES

#### 3.3.1 Environmental Setting

Three existing pole structures and two proposed guard structures would be located in an area that is mapped as Unique Farmland by the Farmland Mapping and Monitoring Program (California Department of Conservation, 2014). The area mapped as Unique Farmland is within the property of a commercial nursery and is not currently utilized as farmland for agricultural purposes.

The Proposed Project Modification area does not include Williamson Act lands, other agricultural preserves, or land zoned as forest land, timberland, or a Timber Production Zone.

#### 3.3.2 Environmental Impacts and Mitigation

The approved Project impacts on agriculture and forestry resources was analyzed in Section 4.15.13 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on agriculture and forestry.

##### 3.3.2.1 Impact on Farmland

Unique Farmland within the Proposed Project Modification area would be temporarily impacted by vehicle traffic and installation of a temporary guard structure. The Unique Farmland within the Proposed Project Modification area is not currently used as farmland for agricultural purposes. The temporary use (2 weeks) of Unique Farmland would not affect future agricultural uses of the area. The impact on Farmland would be less than significant.

##### 3.3.2.2 Impact on Williamson Act Land and Agricultural Preserves

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

## 3 ENVIRONMENTAL ANALYSIS

### 3.3.2.3 Impact on Forest Land, Timberland, or Timber Production Zone

The Proposed Project Modification would not affect any forest land, timberland, or Timber Production Zone.

### 3.3.2.4 Conversion of Farmland or Forest Land

The Proposed Project Modification would not directly or indirectly cause any changes in the existing environment that would result in the conversion of Farmland to nonagricultural use or forest land to non-forest use; there would be no impact from conversion of Farmland or Forestland.

### 3.3.3 Conclusion

The impacts on agriculture and forestry resources would be less than significant. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on agriculture or forestry resources.

## 3.4 AIR QUALITY

### 3.4.1 Environmental Setting

The Proposed Project Modification is located in the San Diego Air Basin, which encompasses all of San Diego County, including the area analyzed for the approved Project. The description of the Air Quality environmental and regulatory setting provided in Section 4.13 of the FEIR applies to the Proposed Project Modification area. The San Diego Air Basin is in nonattainment status for ozone (O<sub>3</sub>) under federal standards. The area is also in nonattainment for O<sub>3</sub>, particulate matter under 10 microns (PM<sub>10</sub>), and particulate matter under 2.5 microns (PM<sub>2.5</sub>) under state standards.

### 3.4.2 Environmental Impacts and Mitigation

The approved Project impacts on air quality and applicable APMs and mitigation measures were analyzed in Section 4.13.13 of the FEIR. The CPUC determined that the approved Project would have a significant and unavoidable impact on air quality.

#### 3.4.2.1 Conflict with Air Quality Plan

The Proposed Project Modification activities would require the use of construction equipment provided in Table 2.2-3. The Proposed Project Modification would not require the use of architectural coatings and would therefore not conflict with the San Diego Regional Air Quality Strategy regarding the use of volatile organic compounds (VOCs) or nitrogen oxides (NO<sub>x</sub>).

#### 3.4.2.2 Impact on Air Quality Standards or Air Quality Violations

The air pollutant emissions resulting from the Proposed Project Modification would be similar to air pollutant emissions from construction of Segment C of the approved Project. Segment C of the approved Project included installation of overhead transmission line at existing SDG&E structures. The transmission line installation activities included slightly more equipment and vehicles than the Proposed Project Modification. Peak daily air pollutant emissions from Segment C were evaluated in the FEIR and provide a conservative estimate of Proposed Project

### 3 ENVIRONMENTAL ANALYSIS

Modification emissions. The peak daily air pollutant emissions from construction of Segment C of the approved Project are presented in Table 3.4-1, below.

**Table 3.4-1 Peak Daily Air Pollutant Emissions**

Activity	Estimated Peak Daily Air Pollutant Emissions (pounds/day)					
	ROG	CO	NOx	SOx	PM10	PM2.5
Construction Equipment	3.16	17.88	24.61	0.03	1.15	1.03
Construction Truck Trips	0.03	0.14	0.45	0.00	0.05	0.02
Worker Trips	0.61	9.50	2.55	0.02	0.52	0.22
Fugitive Dust (Unmitigated)					0.41	0.06
<b>Total</b>	<b>3.80</b>	<b>27.52</b>	<b>27.61</b>	<b>0.06</b>	<b>2.13</b>	<b>1.33</b>
<b>Emissions Threshold</b>	<b>75</b>	<b>550</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>55</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: (SDG&E, 2015)

The Proposed Project Modification activities would not produce air pollutant emissions that would exceed any thresholds for criteria air pollutants. The impact on air quality would be less than significant.

#### 3.4.2.3 Impact from Substantial Pollutant Concentrations or Objectionable Odors

The Proposed Project Modification activities would be conducted within SDG&E's ROW. The vehicles and equipment used for the Proposed Project Modification would not generate substantial pollutant concentrations due to the short-duration (2 weeks) of work and the limited volume of equipment that would be used. The vehicle and equipment use would be similar to existing SDG&E operation and maintenance activities within the ROW. The impact from pollutant concentrations and odors would be less than significant.

#### 3.4.3 Conclusion

Impacts of the Proposed Project Modification would be less than significant. APM AIR-1 and MM AIR-3 require implementation of fugitive dust controls, which would further reduce the air quality emissions. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on air quality.

### 3.5 BIOLOGICAL RESOURCES

#### 3.5.1 Environmental Setting

##### 3.5.1.1 Literature Search and Surveys

###### Literature Search

A search of the California Natural Diversity Database (CNDDDB) was conducted to identify special-status plant and wildlife species that have been documented within 1 mile of the

### 3 ENVIRONMENTAL ANALYSIS

Proposed Project Modification area. Each of the species was evaluated for potential to occur within the Proposed Project Modification area. Existing natural resources data from MCAS Miramar (2012) and SDG&E records from other projects in the vicinity were also reviewed by AECOM prior to the field survey in 2017 (AECOM, 2019a).

#### **Plant and Wildlife Surveys**

Biological resource surveys were conducted in 2017 for areas within a 100-foot buffer surrounding the Proposed Project Modification work areas and access routes. The biological surveys occurred between August and October 2017. Fall is not an optimal time period for recognizing presence of annual flowering plant species; therefore, habitat evaluations were conducted to determine potential for occurrence of special-status flowering plant species (AECOM, 2019a). All species that were observed during field surveys were documented by the biologists. Photos of the Proposed Project Modification area are provided in Appendix B.

#### **Wetland Delineation**

SDG&E biologists noted potential jurisdictional features and potential impacts during field surveys. In addition, wetland specialist, Sundeep Amin, mapped the jurisdictional limits of Rose Creek in the vicinity of the Proposed Project Modification area on September 12, 2017 (AECOM, 2018 a).

#### **CPUC Field Verification**

The CPUC conducted a field verification survey of the vegetation and vernal pool mapping prepared by SDG&E on September 29, 2017 (Sward, 2017). CPUC contractor, Helix Environmental Planning, verified the conditions of all potential vernal pools, vegetation communities, and special-status species potential to occur provided in SDG&E's survey reports. The results of SDG&E's survey reports, as updated the CPUC verification survey, are presented below.

##### **3.5.1.2 Agency Coordination**

The CPUC coordinated with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) in October and November of 2017 to discuss the Proposed Project Modification and biological resource impacts. In 2017, USFWS and CDFW staff concurred with the assessment of the limits of vernal pools and the proposed strategy for avoidance of vernal pools.

##### **3.5.1.3 Vegetation Communities**

The Proposed Project Modification area consists mostly of non-sensitive vegetation communities, including bare ground, disturbed vegetation and landscaping/ornamental vegetation. Other vegetation communities in the Proposed Project Modification and buffer area include Diegan coastal sage scrub, chamise chaparral, coastal sage chaparral, disturbed wetland, non-native grassland, herbaceous wetland, southern mixed chaparral, scrub oak chaparral, and southern willow scrub. The vegetation communities that occur within the Proposed Project Modification area and surroundings are shown on detailed maps enclosed in Appendix B. All of the vegetation communities that occur within the Proposed Project

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Modification area include vegetation communities/habitats that were discussed in Section 4.1.3.1 of the FEIR.

#### 3.5.1.4 Special-Status Species

Special-status species include those species that meet the criteria specified in Section 4.1.1.3 of the FEIR. A total of 28 special-status species have been recorded within 1 mile of the Proposed Project Modification. Special-status species that were observed or have a potential to occur in or near the Proposed Project Modification area are listed in Table 3.5-1. All of the special-status species that are present or have a potential to occur in the Proposed Project Modification area were evaluated in Section 4.1 of the FEIR. Supporting information on each special-status species and their potential to occur is provide in Appendix B.

**Table 3.5-1 Special-Status Species Potential to Occur in Proposed Project Modification Area and 100-Foot Buffer**

Common Name	Status	Habitat	Potential to Occur
<b>Plants</b>			
Spreading navarettia ( <i>Navarettia fossalis</i> )	FT, NCCP	Vernal pools and vernal swales including road rut pools	Potential to occur in vernal pool east of pole Z479050; not detected during surveys
Orcutt's brodiaea ( <i>Brodiaea orcuttii</i> )	NCCP	Meadows, vernal pools, wetlands and close coned coniferous forests, chaparral, and cismontane woodlands adjacent to moist areas	Potential to occur east of pole Z479050; not detected during surveys
San Diego button celery ( <i>Eryngium aristulatum</i> var. <i>parishii</i> )	FE, SE, NCCP	Vernal pools and large marshy areas with white clay soils	Potential to occur east of pole Z479050; not detected during surveys
San Diego goldenstar ( <i>Bloomeria clevelandii</i> )	NCCP	Chaparral, coastal sage scrub, and valley and foothill grasslands	Potential occur within portions of work areas for Z479048, Z479049, GS-21, GS-23, and GS-25; not detected during surveys
San Diego mesa mint ( <i>Pogogyne abramsii</i> )	FE, SE, NCCP	Vernal pools with Redding cobbly loam soils	Potential to occur east of pole Z479050; not detected during surveys
San Diego sagewort ( <i>Artemesia palmeri</i> )	CRPR 4.2	Drainage in chaparral, coastal sage scrub, riparian, mesic, and sandy soils	<b>Present.</b> Observed west of the access road, within the east perimeter of GS-22, and adjacent to Rose Creek
Graceful tarplant ( <i>Holocarpha virgate</i> ssp. <i>elongata</i> )	CRPR 4.2	Clay soils in chaparral, cismontane woodland, coastal sage scrub, grassland, and disturbed areas	<b>Present.</b> Abundant within areas surrounding the Proposed Project Modification; observed within work areas

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Common Name	Status	Habitat	Potential to Occur
Robinson's peppergrass ( <i>Lepidium virginicum</i> var. <i>robinsonii</i> )	CRPR 4.3	Chaparral, coastal sage scrub	Potential to occur within portions of the work area in coastal sage scrub habitat; not detected during surveys
Nuttall's scrub oak ( <i>Quercus dumosa</i> )	CRPR 1B.1	Sandy or clay soils in chaparral, coastal sage scrub, and closed-cone coniferous forests	<b>Present.</b> Observed along the access road and immediately adjacent to GS -21 and within the perimeter of a pole work area
Summer holly ( <i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i> )	CRPR 1B.2	Coastal chaparral on well-drained slopes	<b>Present.</b> An individual was observed in the study area near the access road, but outside disturbance.
Wart-stemmed ceanothus ( <i>Ceanothus verrucosus</i> )	CRPR 2B.2 NCCP	Southern maritime chaparral	<b>Present.</b> Observed within the study area near the access road.
Ashy spike moss ( <i>Selaginella cinerascens</i> )	CRPR 4.1	Coastal sage scrub and chaparral	<b>Present.</b> Observed within the access road and work area for pole Z479050
<b>Wildlife</b>			
Coastal California gnatcatcher ( <i>Polioptila californica californica</i> )	FT, NCCP	Coastal sage scrub habitat dominated by coastal sagebrush	<b>Present.</b> Observed during surveys and suitable habitat is present in areas surrounding the Proposed Project Modification
Orange-throated whiptail ( <i>Aspidoscelis hyperythrus</i> )	NCCP	Chaparral, coastal sage scrub, riparian woodland, conifer forest, and grassland	Suitable habitat occurs throughout the majority of the Proposed Project Modification area; none were observed during surveys
San Diego fairy shrimp ( <i>Branchinecta sandiegonensis</i> )	FE, NCCP	Vernal pools and road rut pools	Suitable habitat occurs within ponded areas within access roads
San Diego coast horned lizard ( <i>Phrynosoma coronatum</i> )	NCCP	Chaparral, coastal sage scrub, riparian, woodland, conifer forest, and grassland	Suitable habitat occurs throughout the majority of the Proposed Project Modification area; none were observed during surveys
San Diego desert woodrat ( <i>Neotoma lepida intermedia</i> )	NCCP	Chaparral, sagebrush, and desert habitats	<b>Presumed Present.</b> A potential desert woodrat midden was observed within the southwest portion of GS-23; suitable habitat occurs within coastal sage scrub areas
Coastal whipsnake ( <i>Aspidoscelis tigris stejnegeri</i> )	SSC	Open chaparral and coastal sage scrub with relatively sparse foliage	Suitable habitat occurs through the Proposed Project Modification area

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Common Name	Status	Habitat	Potential to Occur
<b>Status:</b>			
NCCP = Current SDG&E Natural Community Conservation Plan Covered Species (Subregional NCCP coverage may be assumed to be inapplicable; see Section 4.1.2.3)			
NE = SDG&E Narrow Endemic Species			
HCP = SDG&E Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly			
MSCP = Covered species under the Multiple species Conservation Plan			
Federal/State Listed:			
FE: Federally listed as endangered			
FT: Federally listed as threatened			
SE: State-listed as endangered			
SR: State rare			
Other:			
CFP = California Department of Fish and Wildlife Fully Protected Species			
SSC = California Department of Fish and Wildlife Species of Special Concern			
WL = California Department of Fish and Wildlife Watch List			
California Rare Plant Ranks:			
1B: Plants Rare, Threatened, or Endangered in California and Elsewhere			
2B: Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere			
3: Plants About Which We Need More Information – A Review List			
4: Plants of Limited Distribution – A Watch List			
0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)			
0.2 – Fairly threatened in California (20–80% occurrences threatened/moderate degree and immediacy of threat)			
0.3 – Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)			

Source: (SDG&E, 2018)

#### 3.5.1.5 Riparian Areas and Wetlands

Riparian scrub habitat is located along Rose Creek (refer to Figure 1.2-1 and Appendix B). Guard structure GS-23 and work poles Z479044 and Z479045 are in the vicinity of the riparian scrub habitat at Rose Creek. Vernal pools and disturbed road rut pools are located in proximity to Proposed Project Modification work areas as shown on maps in Appendix B.

#### 3.5.2 Environmental Impacts and Mitigation

The approved Project impacts on biological resources and applicable APMs and mitigation measures were analyzed in Section 4.1.13 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on biological resources with implementation of the mitigation measures contained in the FEIR.

##### 3.5.2.1 Impacts on Special-Status Species

###### Special-Status Plants

The Proposed Project Modification would involve vegetation clearing and trimming of Coastal sage scrub, chaparral, and ornamental landscaping along access roads, around existing pole

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access pads, and at guard structures to minimize potential fire risk and facilitate equipment/vehicle access. Pedestrian access would require 34 square feet of temporary work area at each pole site. Placement of guard structures would involve:

- Vegetation removal for placement of bucket trucks and/or outriggers
- Crushing of vegetation from placement of bucket trucks and/or outriggers
- Vegetation removal in excavations for guard structures

#### *Ashy Spike Moss and Graceful Tarplant*

Ashy spike moss and graceful tarplant were observed within the work area for the Proposed Project Modification. Ashy spike moss and graceful tarplant are ranked CRPR 4.1 CRPR 4.2, respectively, which means the species are of limited distribution or are infrequent throughout a broad area of California. The Proposed Project Modification would impact 6 square feet of ashy spike moss, and less than 100 individuals of graceful tarplant. Consistent with the analysis in the FEIR, the impact on ashy spike moss and graceful tarplant would be less than significant because of the relatively low number of individuals that would be impacted and the lower sensitivity of the species.

#### *Nuttall's Scrub Oak*

Two Nuttall's scrub oaks are located immediately east and north of the edges of GS-21. There is a potential that the species could be impacted during guard structure installation if the equipment worked outside the authorized limits of work. Impacts on Nuttall's scrub oaks would be significant due to the heightened sensitivity of the species and consistent with the analysis in the FEIR. SDG&E would implement APM BIO-1 as part of the Proposed Project Modification activities. Implementation of APM BIO-1 would require that SDG&E avoid impacts on Nuttall's scrub oak by installing fencing or flagging to avoid impacts on the species. Impacts on Nuttall's scrub oak would be avoided through proper delineation of the work areas.

#### *Other Special-Status Plants*

Other special-status plants listed in Table 3.5-1 occur or have the potential to occur near access roads and work areas. No habitat for special-status species listed as federally or state endangered or threatened or CRPR 1 or 2 occurs within the proposed work areas; however, special-status species could be affected if workers traveled outside of the approved work areas. SDG&E would implement APM BIO-1 as part of the Proposed Project Modification activities. Implementation of APM BIO-1 would require SDG&E to avoid flagging or fencing to avoid impacts on special-status species and suitable habitats. Potential impacts on other special-status plants would be avoided through implementation of APM BIO-1.

#### **3.5.2.2 Wildlife**

##### **Direct Impacts**

##### *San Diego Fairy Shrimp*

The potential for San Diego fairy shrimp to occur was discussed in Section 4.1.13.2 of the FEIR. San Diego fairy shrimp could be impacted in the western overhead alignment of the Project where habitat was present. San Diego fairy shrimp are known to occur in the vicinity of the Proposed Project Modification work areas. Vernal pools and road rut pools have been mapped

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along Proposed Project Modification access roads. Endangered fairy shrimp cysts are presumed to be present in documented road ruts and vernal pools. Vehicle and equipment access on roads containing vernal pools or road rut pools could also degrade the quality of the pool or crush San Diego fairy shrimp cysts. These impacts would be significant because any impact to one or more individuals of a federal listed species would significantly affect the population of this species. The CPUC verified the location of road rut pools and access roads to the work area in 2017 and corresponded with USFWS and CDFW. After field visits and verification with agencies about the limits of potential vernal and road rut pools in the Proposed Project Modification area, it was determined that the Proposed Project Modification activities would avoid vernal pools. No direct impacts on fairy shrimp would occur.

#### *Special Status Reptiles (Orange throated whiptail, San Diego coast horned lizard and coastal whipsnake)*

The Project FEIR describes direct impacts from construction activities, such as vegetation removal, grading, and use of access roads, that could injure or kill special-status reptiles, including orange throated whiptail, San Diego coast horned lizard, and coastal whipsnake, which could occur in the Proposed Project Modification area. The Proposed Project Modification construction activities would have the potential to harm or crush sensitive reptiles from travel on access roads, guard structure installation and construction activities at pole access pads. Direct impacts on sensitive reptiles would be a significant effect. SDG&E would implement all APMs and MMs contained in the FEIR.

Implementation of APM BIO-2 would require the application of NCCP protocols for special-status reptile species covered under the current NCCP. NCCP protocols include avoidance measures and compensatory mitigation. Implementation of MMs Biology-1a, Biology-1b, and Biology-1c would reduce impacts on special-status reptiles by requiring reduced vehicle speeds, worker training to avoid sensitive reptiles, pre-construction surveys for special-status reptiles, and delineation of sensitive habitats. Impacts on these special-status reptile species would be less than significant with implementation of the mitigation measures contained in the FEIR.

#### *Coastal California Gnatcatcher*

Coastal California gnatcatcher were observed in the Proposed Project Modification area during surveys in 2017. The Proposed Project Modification would result in direct impacts to special-status bird species if the species were injured or killed during construction activities, including through nest destruction (for all Migratory Bird Treaty Act- and California Fish and Game Code-protected species) or nest abandonment. Habitat impacts from the Proposed Project Modification would be temporary and less than significant. Excessive noise could have a significant adverse effect on the breeding activities of coastal California gnatcatcher if the Proposed Project Modification occurs during the nesting season for the species. SDG&E would implement all APMs and MMs contained in the FEIR. Implementation of SDG&E NCCP protocols in accordance with APM BIO-2 would minimize potential for coastal California gnatcatcher disturbance during construction. In addition, MM Biology-7 specifies pre-construction survey requirements and no disturbance buffers for coastal California

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gnatcatcher. Impacts on coastal California gnatcatcher would be less than significant with mitigation.

#### *San Diego Desert Woodrats*

Placement of GS-23 would have the potential to adversely affect a San Diego desert woodrat midden located to the southwest of the work area. Impacts on woodrats were analyzed as part of the FEIR, and impacts were found to be significant. The Proposed Project Modification activities, similar to those of the approved Project, could disturb woodrats during construction activities through impacts on a midden. The potential impact on San Diego desert woodrat is significant. SDG&E would implement all APMs and MMs included in the FEIR.

Implementation of MM Biology-9 would require pre-construction surveys and avoidance of the San Diego desert woodrat midden. Impacts on San Diego desert woodrat would be less than significant with implementation of the mitigation measures contained in the FEIR.

#### **Indirect Impacts**

Construction disturbance could indirectly impact special-status wildlife through increased erosion and sedimentation; fugitive dust; release of toxic substances (e.g., oil); and invasive, non-native plant species (weeds) introduction and/or spread. These impacts are potentially significant, consistent with the analysis in the FEIR. SDG&E would implement all APMs and MMs contained in the FEIR. Implementation of APM AIR-1 and APM HYDRO-2 would control fugitive dust and erosion/sedimentation. Implementation of APMs HAZ-1 (environmental training for workers) and HAZ-2 (standard operating procedures including spill containment and daily vehicle inspections) would minimize the effects that could occur from using hazardous materials. Implementation of MM Biology-3 would require implementation of a weed control plan to treat weed infestations. Indirect impacts on special-status species would be less than significant with implementation of the mitigation measures contained in the FEIR.

#### **3.5.2.3 Special Habitats**

##### **Riparian Vegetation**

Installation and removal of guard structure GS-23 for work Poles Z479044 and Z479045 may require crossing Rose Creek. The limits of riparian areas along Rose Creek have been identified by a qualified biologist (AECOM, 2018 a). SDG&E would install a temporary steel plate crossing to protect and avoid placing fill in riparian areas. Impacts on riparian habitat would be avoided during implementation of the Proposed Project Modification. No impact would occur.

##### **Vernal Pools**

Vernal and road rut pools were identified in proximity to the Proposed Project Modification area during field surveys in 2017. The proposed work access and approach to implementation of the Proposed Project Modification would avoid all vernal pools and road rut pools. The CPUC, CDFW, and USFWS verified the approach in 2017 and determined that the Proposed Project Modification would avoid impacts on vernal pools. No impact would occur.

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#### Coastal Sage Scrub and Coastal Sage Scrub/Chaparral Mix Habitat

Impacts on coastal sage scrub and coastal sage scrub/chaparral mix are summarized in Table 3.5-2. The impacts would be temporary and use of a flower pot guard structure installation method would reduce impacts on sensitive coastal sage scrub habitats, but the impacts would remain potentially significant.

**Table 3.5-2 Sensitive Habitat Disturbance**

Habitat	Disturbance Square Feet
Coastal sage scrub	1,719
Coastal sage scrub/chaparral mix	16
TOTAL	1,735

Source: (SDG&E, 2018)

SDG&E would implement all APMs and MMs contained in the FEIR. Implementation of MM Biology-6 would require SDG&E to implement habitat restoration to avoid permanent impacts in areas of temporary disturbance. The measure also requires SDG&E to mitigate for habitat loss where impacts cannot be avoided. The impact would be less than significant with implementation of the mitigation contained in the FEIR.

#### 3.5.3 Conclusion

Impacts on biological resources would be less than significant with implementation of the APMs and mitigation measures contained in the Final EIR. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on biological resources, and new mitigation measures would not be required.

### 3.6 CULTURAL RESOURCES

#### 3.6.1 Environmental Setting

Information on cultural resources within the Proposed Project Modification area was obtained through a record search and cultural resources survey performed by SDG&E. The CPUC independently verified the cultural resource information provided by SDG&E in *Cultural Resources Survey Investigation for Minor Project Refinement 8, Sycamore to Peñasquitos 230-kV Transmission Line* (AECOM, 2018 b) and requested additional investigation of a resource located within the Proposed Project Modification area in 2019. The results of the additional investigation were provided to CPUC for concurrence and approval. The cultural record search, survey, and results are summarized below.

##### 3.6.1.1 Records Searches and Surveys

###### Records Searches

SDG&E conducted an archival research for previously recorded areas and previous survey reports within a 0.25-mile buffer of the Proposed Project Modification components at the South

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Coastal Information Center (SCIC) in January 2017 (Ports & Foglia, 2017). A supplemental records search was performed for the Proposed Project Modification area by SDG&E in August 2017 (Ports & Foglia, 2017).

A desktop review was conducted to identify resources within the vicinity of the Proposed Project Modification work locations.

#### Surveys

An intensive pedestrian survey of the pole work areas outside of MCAS Miramar was conducted by AECOM on August 17, 2018. Guard structures were surveyed on August 25, 2017 (AECOM, 2018 b). An additional survey of a temporary work area and the previously recorded extents of CA-SDI-10250 that could be accessed within the SDG&E ROW was performed by AECOM on March 14, 2019 (AECOM, 2019b). MCAS Miramar is considered 100 percent inventoried and a further cultural resource survey of MCAS Miramar was not performed.

#### 3.6.1.2 Cultural Resources in the Proposed Project Modification Area

The 37 cultural resources identified within 0.25 mile of the Proposed Project Modification area are provided in Table 3.6-1. Two cultural resources, CA-SDI-10250 (prehistoric lithic scatter) and CA-SDI-11789 (prehistoric lithic scatter), were identified within 100 feet of the Proposed Project Modification, and Site P-37-024739 (the Atchison, Topeka and Santa Fe Railroad) is located within the project vicinity. Site CA-SDI-11789 and P-37-024739 are located entirely outside the proposed work area boundary and were not evaluated further.

Two previously recorded sites (CA-SDI-10250 and P-37-024739) were updated during the pedestrian surveys and one new isolate (P-37-037745) was recorded. CA-SDI-10250 was updated to account for multiple cultural resource investigations and site boundary delineations dating back to 1985. The isolate P-37-037745 was determined to be an element of CA-SDI-10250 rather than an isolated artifact, and the site boundary was determined to overlap with the Proposed Project Modification area. A portion of CA-SDI-10250, south of the proposed work

**Table 3.6-1 Cultural Resources Identified within 0.25 mile of the Work Sites**

Resource Site	Within or Adjacent to Proposed Work Areas?	Eligibility
CA-SDI-5605	No	Not evaluated
CA-SDI-5606	No	Not Evaluated
CA-SDI-5608	No	Not Evaluated
CA-SDI-8803	No	Not Evaluated
CA-SDI-10249	No	Not Evaluated
<b>CA-SDI-10250/P-37-037745</b>	<b>Yes</b>	<b>A portion of the site was tested and recommended as not eligible; portions of the site could be eligible</b>
CA-SDI-10251	No	Not Evaluated
CA-SDI-11763	No	Not Eligible

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Resource Site	Within or Adjacent to Proposed Work Areas?	Eligibility
CA-SDI-11765	No	Not Eligible
CA-SDI-11788	No	Not Eligible
CA-SDI-11789/P-37-011789	No	Not Evaluated
CA-SDI-12410	No	Not Eligible
CA-SDI-12411	No	Not Eligible
CA-SDI-12412	No	Not Eligible
CA-SDI-12413	No	Not Evaluated
CA-SDI-12414	No	Not Eligible
CA-SDI-12416	No	Not Eligible
CA-SDI-12417	No	Not Eligible
CA-SDI-12427	No	Not Eligible
CA-SDI-12438	No	Not Eligible
CA-SDI-12440	No	Not Eligible
CA-SDI-12441	No	Not Eligible
CA-SDI-12927	No	Not Eligible
P-37-014804	No	Not Eligible
P-37-014805	No	Not Eligible
P-37-014971	No	Not Eligible
P-37-014972	No	Not Eligible
P-37-014973	No	Not Eligible
P-37-014974	No	Not Eligible
P-37-014975	No	Not Eligible
P-37-014976	No	Not Eligible
P-37-014977	No	Not Eligible
P-37-014978	No	Not Eligible
P-37-014979	No	Not Eligible
P-37-014980	No	Not Eligible
P-37-014981	No	Not Eligible
P-37-015215	No	Not Eligible
P-37-024739	No	Eligible

Sources: (AECOM, 2018 b; AECOM, 2019a)

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area, has been subject to archaeological testing and was previously recommended as not eligible for CRHR; however, portions of the site could be eligible because previous testing efforts did not encompass the entire site (Duke, 2019).

Site P-37-024739 is a segment of a National Register of Historic Places-eligible, currently active railroad, and would be avoided during construction activities.

#### 3.6.2 Environmental Impacts and Mitigation

The approved Project impacts on cultural resources and applicable APMs and mitigation measures were analyzed in Section 4.3.13 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on cultural resources with implementation of the mitigation measures contained in the FEIR.

##### 3.6.2.1 Impact on Known Cultural Resources

Results of the records search and pedestrian surveys of the Proposed Project Modification area indicate that one cultural resource site (CA-SDI-10250/P-37-037745) is partially located within one of the Proposed Project Modification work areas. Construction activities would include vegetation removal and use of bucket truck outriggers, and other heavy equipment. Ground disturbance or ground surface compression (from stabilizers and heavy equipment) have the potential to damage, destroy, or displace known cultural resources that occur in overlapping work areas. The portion of CA-SDI-10250 that is located within the Proposed Project Modification area is potentially eligible for listing and impacts on the resource are, therefore, potentially significant. To avoid impacts on the potentially significant resource, SDG&E would demarcate the boundary of the cultural resource using environmentally sensitive area (ESA) flagging and would avoid equipment activity within the resource boundaries (APM CUL-2) and monitor construction at the resource site (APM CUL-1 and MM Cultural Resources-1). MM Cultural Resources-2 would require worker training to ensure workers understand ESA boundaries and consequences of impacting cultural resources. MM Cultural Resources-3 would require a monitoring report that would document protection of resources. Implementation of APM CUL-1, APM CUL-2, and MM Cultural Resources-1 through 3 would ensure that equipment, vehicles, and personnel avoid travel into the resource boundary areas and avoid impacts on the resource. The impact on known cultural resources would be less than significant with implementation of APMs and mitigation measures included in the FEIR.

##### 3.6.2.2 Impact on Undiscovered Cultural Resources

The cultural resources literature review and pedestrian surveys indicate a high sensitivity for cultural resources near several Proposed Project Modification work areas. Ground-disturbing activities for guard structure installations and bucket truck outriggers at pole access pads could disturb, damage, or destroy previously undiscovered cultural resources at or just below the ground surface. Displacement, damage, or destruction of a cultural resource would be a significant impact. SDG&E would implement the APMs and MMs included in the FEIR. Implementation of APM CUL-1 would require assessment and protection of any previously unidentified resources. MM Cultural Resources-1 would require monitoring of all ground-disturbing activities by a qualified archaeologist and Native American monitor to protect

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undiscovered resources and establish guidelines for evaluation and treatment of resources. Implementation of MM Cultural Resources-2 would require worker training to ensure workers understand ESA boundaries and consequences of impacting cultural resources. MM Cultural Resources-3 would require a monitoring report that would document protection of resources. Impacts on previously undiscovered resources would remain less than significant with implementation of APMs and mitigation measures included in the FEIR.

### 3.6.2.3 Impact on Human Remains

There is no evidence to suggest the presence of human remains within or near any of the Proposed Project Modification areas; however, disturbance of human remains would be a significant impact. SDG&E would implement the APMs and MMs included in the FEIR. In the unlikely event that human remains are encountered during ground disturbance (e.g., guard structure installation), SDG&E would implement MM Cultural Resources-4, which specifies the procedures to be followed for discovery of human remains, including stopping work within 50 feet of the find, flagging the area, contacting the County coroner and notifying the Native American Heritage Commission, if appropriate. If the remains are believed to be Native American, the most likely descendant would have 48 hours to make recommendations for the treatment of the remains. Impacts on human remains would be less than significant with implementation of the mitigation measures included in the FEIR.

### 3.6.3 Conclusion

Proposed Project Modification impacts on cultural resources would be less than significant with implementation of the APMs and mitigation measures included in the FEIR. The Proposed Project Modification activities would not result in a new impact or increase the severity of a previously analyzed impact on cultural resources, and new mitigation measures would not be required.

## 3.7 ENERGY

### 3.7.1 Setting

The Proposed Project Modification is located within SDG&E's service territory. The Energy setting for the Proposed Project Modification is consistent with the setting in the FEIR.

### 3.7.2 Environmental Impacts and Mitigation

The approved Project impacts on energy conservation were analyzed in Section 7.2 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on energy resources.

Construction of the Proposed Project Modification would require the manufacture of new materials, such as replacement dampers and clips, requiring the use of energy. The production of these materials would result in consumption of natural resources, including fossil fuels. However, SDG&E would reuse, recycle, or donate all old materials (e.g., dampers and clips) and components not needed for the Proposed Project Modification to the greatest extent

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feasible. The reuse and recycling of existing components would partially offset the energy needed to produce new materials.

Energy consumption during construction of the Proposed Project Modification would include the use of fossil fuels during transport of construction workers and equipment. Construction workers would be required to drive personal and/or company vehicles to construction areas. Construction equipment would be driven or transported by truck to work locations. The limited nature of the Proposed Project Modification activity and the short (2-week) duration of construction would limit the quantity of fossil fuels required for construction. No increase in energy inefficiency or unnecessary energy consumption are expected to occur as a direct or indirect consequence of the Proposed Project Modification.

In addition, construction vehicles would minimize unnecessary idling time and would be properly tuned and maintained in accordance with manufacturer specifications (APM AIR-2). Equipment would also be required to meet a minimum of EPA's Tier 3 emissions standards (MM Air-4). These construction practices would minimize the use of fossil fuels and ensure energy use is less than significant.

### 3.7.3 Conclusion

Implementation of approved Project APMs and MMs would ensure the efficient use of fossil fuels and would ensure the Proposed Project Modification impacts would be less than significant. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on energy.

## 3.8 GEOLOGY AND SOILS

### 3.8.1 Environmental Setting

#### 3.8.1.1 Geology

The Proposed Project Modification traverses a mix of sloping hillsides, mesas, and terraces. Elevations in the Proposed Project Modification area range from 245 feet to 388 feet. Geologic formations in the Proposed Project Modification area include:

- Holocene alluvial floodplain deposits
- Lindavista Formation
- Friars Formation
- Scripps Formation

The Proposed Project Modification area does not cross any mapped landslides; however, most of the area is underlain by landslide-prone sedimentary rocks.

#### 3.8.1.2 Soils

Mapped soil units in the Proposed Project Modification area are provided in Table 3.8-1. The Proposed Project Modification area is underlain by soils formed in marine terraces and by soils

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**Table 3.8-1 Soil Units in the Proposed Project Modification Area**

Soil Series	Description	Slope Percent	Runoff Rate	Shrink/Swell Potential	Erosion Potential
Altamont clay	Deep, well-drained soils that formed in material weathered from fine-grained sandstone and shale. Found in gently sloping to very steep uplands.	30 to 50	Medium to rapid	High	Moderate to high
Chesterton fine sandy loam	Moderately well-drained fine sandy loams. Formed in material weathered in place from soft ferruginous sandstone. Found on ridges and in swales.	5 to 9	Slow	Moderate	Slight
Olivenhain cobbly loam	Moderately well-drained, moderately deep to deep cobbly loams that consist of very cobbly clay subsoil. Alluvium found on gently to strongly sloping terrain and on dissected marine terraces	9 to 30 30 to 50	Slow to medium	Low to moderate	Low
Redding gravelly loam	Well drained gravelly loams that have a hardpan. Includes duripan horizon (cemented soil); forms in alluvium derived from mixed sources; found on nearly level or dissected and undulating to hilly high terraces	2 to 9	Very low to rapid	Low (surface) to moderate	Low
Terrace escarpments	Long, narrow, rocky areas with steep faces that rise abruptly from mean tide line to coastal plain terraces or plateaus; composed of soft coastal sandstone, hard shale, or hard, weather-resistant, fine-grained sandstone	N/A	N/A	Variable	Variable

Source: (USDA, 2018)

formed in alluvium. The soil erosion hazard ranges from low to high. Shrink/swell (expansive) potential of the soils associations varies from low to high (USDA, 2018).

#### 3.8.1.3 Paleontological Resources

A paleontological resource study was completed for the Proposed Project Modification areas in August 2017 (SDNHM, 2017). The study included a records search and literature review conducted by the San Diego Natural History Museum. The results of the study showed that no previously recorded fossil localities are located within the work areas, although six fossils are recorded within a 0.25-mile radius of the temporary work areas. The six localities produced fossil leaves and marine invertebrates including snails, clams, crabs, and sea urchins (SDNHM, 2017).

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Geological maps were reviewed to determine the paleontological sensitivity of geologic formations in the Proposed Project Modification study area. The following geologic units occur within the Proposed Project Modification area:

- Holocene alluvial floodplain deposits (Low sensitivity for paleontological resources)
- Lindavista Formation (Moderate sensitivity for paleontological resources)
- Friars Formation (High sensitivity for paleontological resources)
- Scripps Formation (High sensitivity for paleontological resources)

Moderate and high sensitivity deposits are mapped at the surface of guard structure locations GS-19 to GS-21, GS-24, and GS-26 to GS-32. Moderate and high sensitivity paleontological resource units are likely present at shallow depths beneath the low-sensitivity Holocene alluvium at GS-22 and GS-23.

#### 3.8.2 Environmental Impacts and Mitigation

The approved Project impacts on geology and soils resources and applicable APMs and mitigation measures were analyzed in Section 4.5.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on geology and soils with implementation of the mitigation measures contained in the FEIR.

The approved Project impacts on paleontological resources and applicable APMs and mitigation measures were analyzed in Section 4.4.13 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on paleontological resources with implementation of the mitigation measures contained in the FEIR.

##### 3.8.2.1 Impacts from Seismic Related Ground Failure, Landslides, or Unstable Geologic or Soil Units

Ground-disturbing construction activities for the Proposed Project Modification would be limited to trucks and equipment traveling to the temporary work area on existing unpaved roads, and the installation of guard structures; no grading would occur. The Proposed Project Modification would not involve the installation of new permanent structures. All ground-disturbing impacts would be temporary. The activity would not increase the risk of a seismic event or seismic-related ground failure. Travel on existing access roads and installation of temporary guard structures would not destabilize soils, lead to landslides, liquefaction or other landslide-related impacts due to the limited extent of ground disturbance associated with the activities.

##### 3.8.2.2 Impacts on Erosion and Loss of Topsoil

The Proposed Project Modification activities have the potential to cause minor, localized erosion as a result of vehicle travel on unpaved access roads and installation and removal of guard structures. SDG&E would implement sediment and erosion controls during the Proposed Project Modification as described in 2.2.7, above. The potential erosion impacts would be less than significant.

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### 3.8.2.3 Impacts from a Septic Tank

The proposed Project Modification would not require the installation of a septic tank. The impacts would be less than significant.

### 3.8.2.4 Impacts on Paleontological Resources

The Proposed Project Modification would have the potential to result in impacts on paleontological resources during direct-bury of the guard structure poles within formations with a moderate to high sensitivity for paleontological resources. The impacts on paleontological resources would be similar to those analyzed for construction of the approved Project in the FEIR. Impacts on paleontological resources would be potentially significant because the guard structure poles could potentially damage a paleontological resource. SDG&E would implement APMs and MMs contained in the FEIR. Implementation of paleontological monitoring in areas with moderate or high sensitivity in accordance with MM Paleontology-1, noting areas requiring paleontological monitoring on project plans in accordance with MM Paleontology-2, and evaluation and preservation of any previously undiscovered paleontological resources in accordance with MM Paleontology-3 would reduce impacts on paleontological resources. Impacts on paleontological resources would be less than significant with implementation of mitigation measures contained in the FEIR.

### 3.8.3 Conclusion

Vehicle travel on existing access roads and the temporary installation of guard structures would not cause significant impacts on geology or soils, including paleontological resources. Proposed Project Modification impacts on geology and soils would be less than significant. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on geology and soils.

## 3.9 GREENHOUSE GAS EMISSIONS

### 3.9.1 Environmental Setting

Greenhouse gas (GHG) emissions are a global consideration, as described in Section 4.14 of the FEIR. The California Air Resources Board has adopted policies to reduce greenhouse gas emissions. The environmental and regulatory setting for GHGs is consistent with the description of the setting in the FEIR.

### 3.9.2 Environmental Impacts and Mitigation

The approved Project impacts on GHG emissions and applicable APMs and mitigation measures were analyzed in Section 4.14.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on GHG emissions with implementation of the mitigation measures contained in the FEIR.

#### 3.9.2.1 Impacts from GHG Emissions

The type of equipment that would be used during Proposed Project Modification activities would be similar to the equipment used for installation of the transmission line in Segment C of

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the approved Project, which was analyzed in Section 3.14 of the FEIR (see also Section 3.4 above). Equipment used for vegetation trimming, installation of guard structures, and conductor tensioning and sagging would generate GHG emissions. The minor vehicle and equipment activity required for the Proposed Project Modification would not exceed the emissions thresholds adopted by the South Coast Air Quality Management District of 10,000 metric tons of carbon dioxide equivalent per year (SCAQMD, 2008). The impacts of the Proposed Project Modification would be less than significant.

#### 3.9.2.2 Conflict with a GHG Reduction Policy

Disposal of removed or trimmed vegetation (organic waste) in landfills would conflict with AB 1826 and would be a significant impact due to conflicts with a GHG reduction policy. SDG&E would implement the APMs and MMs included in the FEIR. MM GHG-1 requires SDG&E to dispose of organic waste, including trimmed vegetation, outside of a landfill. Implementation of MM GHG-1 would avoid conflict with a GHG reduction plan. The impact would be less than significant with implementation of the mitigation measures contained in the FEIR.

#### 3.9.3 Conclusion

Proposed Project Modification impacts on GHG would be less than significant with implementation of the mitigation measure included in the FEIR. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on GHG, and new mitigation measures would not be required.

### 3.10 HAZARDS AND HAZARDOUS MATERIALS

#### 3.10.1 Environmental Setting

The Proposed Project Modification work areas would occur on previously graded access roads and pole access pads within SDG&E ROW. No open hazardous materials sites occur within 0.25 mile of the Proposed Project Modification (SDG&E, 2018). Three poles are located within Village Nursery, where hazardous materials are stored as part of the on-going nursery operation.

#### 3.10.2 Environmental Impacts and Mitigation

The approved Project impacts on hazards and hazardous materials and applicable APMs and mitigation measures were analyzed in Section 4.11.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on hazards and hazardous materials with implementation of the mitigation measures contained in the FEIR.

##### 3.10.2.1 Impacts from Transport, Use, or Storage of Hazardous Material

The hazardous materials (fuels and fertilizer) stored at Village Nursery would not be impacted by the Proposed Project Modification. The Proposed Project Modification activities would include the routine transport, use, and disposal of common hazardous materials such as fuels and lubricants. Proposed Project Modification activities have a potential to release hazardous materials through an accidental spill or other unauthorized release associated with vehicle and

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equipment. A hazardous materials release could also occur during equipment and vehicle servicing and refueling. The potential for a release or spill is low because of the limited number of vehicles that would be used during activities and the short (2-week) duration of activities; however, spills or leaks of hazardous materials during the Proposed Project Modification activities could occur. In addition, there is a potential for release of hazardous materials due to a dig-in of a gas pipeline during guard structure installation. Public exposure to any releases of hazardous materials would be a significant impact.

SDG&E would implement APMs and MMs in the FEIR to reduce potential impacts from leaks of hazardous materials. APM HAZ-1 requires SDG&E to prepare a Safety and Environmental Awareness Program, which would provide training for Proposed Project Modification workers on hazardous materials protocols. APM HAZ-2 requires SDG&E to implement spill containment and daily vehicle inspections. APM HAZ-3 requires SDG&E contractors to implement their own compliance management programs to ensure that regulatory requirements are adhered to and that worker and public safety are secured. MM Hazards-3 would further minimize accidental spill impacts and hazardous materials exposure by requiring SDG&E to prepare and implement a Hazardous Substance Control and Emergency Response Plan. MM Hazards-4 would require SDG&E to uncover or “pothole” existing utility pipelines prior to excavation for guard structures and MM Utilities-3 would require SDG&E to notify the appropriate utility companies of construction activities. Any spills or leaks of hazardous materials would be properly contained and public exposure to hazardous materials would be avoided through implementation of the APMs and mitigation measures contained in the FEIR.

#### **3.10.2.2 Impact on Hazardous Materials Sites and Hazardous Emissions Near Schools**

There are no existing or proposed schools, or open hazardous materials sites within 0.25 mile of the Proposed Project Modification. Excavation activities are limited to guard structure installations. The Proposed Project Modification would not create emissions from construction within a hazardous materials site or handle hazardous materials within 0.25 mile of a school.

#### **3.10.2.3 Impact on Air Traffic**

There is no public airport within 2 miles of the Proposed Project Modification. The nearest airstrip to the Proposed Project Modification is the MCAS Miramar airstrip, located approximately 1 mile east of the Proposed Project Modification. The Proposed Project Modification would not install any new structures and no helicopters would be required for the modification. The Proposed Project Modification would not impact air traffic.

#### **3.10.2.4 Impact on Emergency Access**

The Proposed Project Modification may result in lane closures on public roads during guard structure installation activities. Interference with emergency access would be a significant impact. SDG&E would implement the APMs and MMs in the FEIR. SDG&E would implement a Construction Transportation Management Plan in accordance with MM Traffic-1, maintain emergency access in accordance with MM Traffic-6, and notify emergency personnel of road closures in accordance with MM Traffic-8 to reduce impacts on emergency access. Impacts on emergency access would be less than significant with implementation of the mitigation measures contained in the FEIR.

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### 3.10.2.5 Impact on Unexploded Ordnance

The Proposed Project Modification is partially located within MCAS Miramar, which was historically used for bombing and munitions testing, creating the potential to encounter unexploded ordnance during ground-disturbing activities. Installation of guard structures or vehicle travel in areas of unexploded ordnance would be a significant effect. SDG&E would implement the APMs and MMs in the FEIR. Implementation of a survey for unexploded ordnance and personnel training in accordance with MM Hazards-6 would reduce the risk of injury or death involving unexploded ordnance. Impacts from unexploded ordnance would be less than significant with implementation of the mitigation measures contained in the FEIR.

### 3.10.2.6 Impact from Shock Hazards

No new transmission lines would be installed or electrified as a result of the Proposed Project Modification. The Proposed Project Modification activities would not create any potential shock hazards. No impact related to shock hazards would occur.

### 3.10.2.7 Impact on Wildfire Hazards

The entire Proposed Project Modification area is located within a very high fire hazard severity zone. Proposed Project Modification impacts on wildfire hazards are addressed in Section 3.21, below.

### 3.10.3 Conclusion

Proposed Project Modification impacts on hazards and hazardous materials would be less than significant with implementation of the APMs and mitigation measures included in the FEIR. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact relating to hazards and hazardous materials, and new mitigation measures would not be required.

## 3.11 HYDROLOGY AND WATER QUALITY

### 3.11.1 Environmental Setting

The Proposed Project Modification activities would be located near Rose Creek in Rose Canyon (refer to Figure 1.2-1). Rose Creek is the primary east-west drainage channel that passes within the Proposed Project Modification area. Rose Creek flows southwest and drains into Mission Bay and then ultimately flows into the Pacific Ocean. The stream flow of Rose Creek in the area of the Proposed Project Modification is mostly ephemeral, where the stream tends to become active after rainfall.

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

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The Rose Creek 100-year floodplain extends into the Proposed Project Modification area south of the railroad tracks and east of I-805. The 100-year floodplain is located within the work area for guard structure GS-23.

#### **3.11.2 Environmental Impacts and Mitigation**

The approved Project impacts on hydrology and water quality and applicable APMs and mitigation measures were analyzed in Section 4.6.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on hydrology and water resources with implementation of the mitigation measures contained in the FEIR.

##### **3.11.2.1 Impact from Violation of Water Quality Standards or Waste Discharge Requirements**

The Proposed Project Modification would require crossing of a water resource. A qualified wetland biologist conducted a field assessment on August 31, 2017, to identify and mark the outer limits of water resources in the Proposed Project Modification area (AECOM, 2018 a). SDG&E would place temporary steel plates over Rose Creek to allow vehicles and equipment to cross Rose Creek to access the Proposed Project Modification work sites and avoid discharge to waters of the U.S. and state. The Proposed Project Modification would not require dewatering and would not involve any discharges to waters. The Proposed Project Modification would not involve activities that could violate water quality standards or waste discharge requirements. Impacts on water quality would be less than significant.

##### **3.11.2.2 Impacts on Groundwater Supply**

The Proposed Project Modification would not require groundwater use. No dewatering would be required for the Proposed Project Modification. The Proposed Project Modification would not require installation of new impervious surfaces. No impact on groundwater supplies or recharge would occur.

##### **3.11.2.3 Impacts on the Course of Stream or River and Run-off**

The Proposed Project Modification would not require any grading. All guard structures would be installed in upland areas and would not affect the course of a stream or river. Vehicle travel and vegetation removal on existing access roads and pole access pads would not alter the existing drainage patterns, alter the course of any stream and/or river, or increase the amount of runoff generated from the area. No changes would occur to the existing velocity or volume of storm water flows. The Proposed Project Modification would not impact the course of a stream or river, alter drainage patterns, or cause an increase in run-off or erosion from the area.

##### **3.11.2.4 Impacts on Flood Flows**

The Proposed Project Modification would include installation of guard structures within the 100-year floodplain. Guard structures would be temporary and removed at the completion of construction. The guard structures would not redirect any flood flows due to the short-term temporary nature of the guard structures. No impact on flood flows would occur.

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### 3.11.3 Conclusion

Proposed Project Modification impacts on hydrology and water quality would be less than significant. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on hydrology and water quality.

## 3.12 LAND USE AND PLANNING

### 3.12.1 Environmental Setting

The Proposed Project Modification would be located entirely within SDG&E ROW within MCAS Miramar and the City of San Diego. Land use plans for MCAS Miramar and the City of San Diego were discussed in Section 4.9 of the FEIR.

### 3.12.2 Environmental Impacts and Mitigation

The approved Project impacts on land use and planning were analyzed in Section 4.9.12 of the FEIR. The CPUC determined that the approved Project would have no impact on land use and planning.

#### 3.12.2.1 Impacts on an Established Community

The Proposed Project Modification would not introduce any permanent infrastructure. All activities would be conducted within SDG&E's ROW. No impact from physically dividing an established community would occur.

#### 3.12.2.2 Conflict with an Applicable Land Use Plan

Proposed Project Modification activities would occur in SDG&E ROW. The activities would be similar to existing SDG&E operation and maintenance activities that occur in the area. The Proposed Project Modification would not conflict with any land use plans.

Pursuant to GO No. 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the Proposed Project Modification. No impact would result from conflicts with an applicable land use plan because local land use plans do not apply to the Proposed Project Modification and the Proposed Project Modification would not conflict with any land use plan.

### 3.12.3 Conclusion

The Proposed Project Modification would have no impact on land use and planning. The Proposed Project Modification would not result in any new impacts or increase the severity of a previously analyzed impact on land use and planning.

## 3.13 MINERAL RESOURCES

### 3.13.1 Environmental Setting

The California Surface Mining and Reclamation Act of 1975 requires that the State Geologist classify land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the land. Eight of the of the Proposed Project Modification pole work areas are

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located within MRZ 2 and a buffer from MRZ2 (City of San Diego, 2008). The remaining temporary work areas are located in MRZ 4. The MRZs are defined as:

- MRZ 2: Areas where adequate information indicates significant mineral deposits are present or where it is judged that there is a high likelihood for their presence
- MRZ 4: Areas where available information is inadequate for assignment to any other MRZ

No active mining claims are located within the Proposed Project Modification area.

#### 3.13.2 Environmental Impacts and Mitigation

The approved Project impacts on mineral resources were analyzed in Section 4.5.12 of the FEIR. The CPUC determined that the approved Project would have no impact on mineral resources.

The Proposed Project Modification includes temporary work and guard structure installation within SDG&E's ROW. The Proposed Project Modification would not affect access to any mineral resources. No impact on mineral resources would occur.

#### 3.13.3 Conclusion

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

### 3.14 NOISE

#### 3.14.1 Environmental Setting

The Proposed Project Modification is located in an open space area that is adjacent to industrial, agricultural, and military land uses. The southern end of the Proposed Project Modification alignment would be within 200 feet of I-805, which dominates ambient noise levels in the area.

The Proposed Project Modification area is located approximately 1.15 miles from the airstrip at MCAS Miramar. The closest sensitive receptor (a residence) is approximately 585 feet west of pole Z479042 and on the opposite side of I-805. The nearest school to the Proposed Project Modification is Standley Middle School, located 1.35 miles west of pole Z479040.

#### 3.14.2 Environmental Impacts and Mitigation

The approved Project impacts on noise and applicable APMs and mitigation measures were analyzed in Section 4.8.13 of the FEIR. The CPUC determined that the approved Project would have a significant and unavoidable impact on noise.

##### 3.14.2.1 Impacts from Generation of Noise Levels in Excess of Standards and Temporary or Periodic Substantial Increase in Noise Levels

SDG&E has proposed a construction schedule that complies with the City of San Diego noise standards. The Proposed Project Modification would require construction equipment similar to

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the equipment used for stringing conductor for the Sycamore-Peñasquitos 230-kV transmission line, which includes bucket trucks, cranes, a caterpillar tractor (bulldozer), transmission line trucks, a flatbed trailer, a semi-tractor, framers, and a water truck; however, helicopters would not be required for construction of the Proposed Project Modification. A pulling rig (which could result in noise levels of 80 dBA Leq at 50 feet; refer to Table 4.8-10 of the FEIR) would be the loudest piece of equipment associated with wire tensioning. Wire tensioning at the poles would generate noise of 52.2 dBA (Leq) at the residence near the pole, the nearest sensitive receptor (FHWA, 2008). Noise from traffic on I-805 is estimated to be between 70 and 80 dBA at the closest sensitive receptor (FHWA, 2003). Noise from the Proposed Project Modification would not be noticeable above the noise from freeway traffic. Noise levels would not exceed noise thresholds and the Proposed Project Modification would not cause a substantial temporary increase in noise levels. The impact on noise levels would be less than significant.

#### **3.14.2.2 Impact from Permanent Increase in Noise Levels**

The Proposed Project Modification would not introduce any new equipment or infrastructure. The Proposed Project Modification would have no effect on permanent noise levels.

#### **3.14.2.3 Impact from Location within 2 Miles of an Airport Land use Plan**

The construction of the Sycamore-Peñasquitos 230-kV transmission line occurred on Miramar Road, approximately 0.85 mile from the MCAS Miramar airstrip. The Proposed Project Modification would be approximately 1.15 miles from the airstrip at MCAS Miramar. Construction workers may be exposed to noise generated by aircraft flying over the Proposed Project Modification area; however, aircraft noise levels would be less than the noise levels generated by construction equipment activities. The MCAS Miramar aircraft would therefore not expose Proposed Project Modification construction workers to excessive noise levels. Impacts would be less than significant.

#### **3.14.3 Conclusion**

The Proposed Project Modification would have a less-than-significant impact on noise. The Proposed Project Modification would not result in a new impact or increase the severity of a previously identified impact related on noise.

### 3.15 POPULATION AND HOUSING

#### **3.15.1 Environmental Setting**

The Proposed Project Modification would occur within SDG&E's ROW. No housing is located in the Proposed Project Modification area.

#### **3.15.2 Environmental Impacts and Mitigation**

The approved Project impacts on population and housing were analyzed in Section 4.16.12 of the FEIR. The CPUC determined that the approved Project would have no impact on population and housing.

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### 3.15.2.1 Impact on Population Growth

The Proposed Project Modification would involve work for a 2-week period and would not create any permanent jobs. The Proposed Project Modification would have no impact on population growth.

### 3.15.2.2 Impact on Displaced People or Housing

The Proposed Project Modification would include work on an existing 230-kV overhead transmission line in an area where housing does not exist. The Proposed Project Modification would not displace people or housing. No impact would occur.

### 3.15.3 Conclusion

The Proposed Project Modification would not impact population and housing. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on population and housing.

## 3.16 PUBLIC SERVICES

### 3.16.1 Environmental Setting

The Proposed Project Modification is located within the existing SDG&E ROW, primarily on open space located within MCAS Miramar. Routes to the Proposed Project Modification access roads would include Governor Drive, Nobel Drive, Miramar Road, and Eastgate Mall.

### 3.16.2 Environmental Impacts and Mitigation

The approved Project impacts on public services and applicable APMs and MMs were analyzed in Section 4.17.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on public services with implementation of the mitigation measures contained in the FEIR.

#### 3.16.2.1 Impacts on Governmental Facilities

The Proposed Project Modification is located in SDG&E's ROW, and would not affect any governmental facilities including fire protection, police protection, schools, parks, or other public facilities. The Proposed Project Modification would have no effect on governmental facilities.

#### 3.16.2.2 Impact on Demand for Governmental Services and Facilities

The Proposed Project Modification would not create any permanent jobs and would not induce population growth in the area. The Proposed Project Modification would not increase demand for governmental services. The Proposed Project Modification would have no impact on governmental services and facilities.

### 3.16.3 Conclusion

The Proposed Project Modification would have no impact on public services. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on public services.

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### 3.17 RECREATION

#### 3.17.1 Environmental Setting

The Proposed Project Modification area is within SDG&E's existing ROW. The majority of the Proposed Project Modification is surrounded by MCAS Miramar, which is not open to the public. The Proposed Project Modification is located approximately 500 feet west of Rose Canyon Open Space Park. Rose Canyon Open Space Park is located west of I-805 and is owned by the City of San Diego.

#### 3.17.2 Environmental Impacts and Mitigation

The approved Project impacts on recreation and applicable APMs and MMs were analyzed in Section 4.10.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on recreation with implementation of the mitigation measures contained in the Final EIR.

##### 3.17.2.1 Impact on Parks

The Proposed Project Modification would be located on land owned by MCAS Miramar and within SDG&E ROW. The Proposed Project Modification would not affect any parks, including the nearby Rose Canyon Open Space Park. The Proposed Project Modification would not create any permanent employment and would not induce population growth that could cause increased use and physical deterioration of parks. The Proposed Project Modification would have no impact on the need for parks or physical deterioration of parks.

##### 3.17.2.2 Impact from Disruption of Recreational Activities or Recreational Value

The Proposed Project Modification would not disrupt any recreational activities because the Proposed Project Modification area is not available for recreational use. The nearest recreational area to the Proposed Project Modification area is Rose Canyon Park. The short-term duration (2 weeks) and minor activities required to implement the Proposed Project Modification would not decrease the recreational value of any recreational facilities. The Proposed Project Modification would have no impact on recreational activities or the value of any recreational resources.

#### 3.17.3 Conclusion

The Proposed Project Modification would have no impact on recreation. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on recreation.

### 3.18 TRANSPORTATION

#### 3.18.1 Environmental Setting

The Proposed Project Modification work areas would be accessed from SDG&E's existing unpaved access roads. The access roads are not accessible to the public. Vehicles would travel to the access roads from Governor Drive, Nobel Drive, Miramar Road, and Eastgate Mall.

## 3 ENVIRONMENTAL ANALYSIS

### 3.18.2 Environmental Impacts and Mitigation

The approved Project impacts on recreation and applicable APMs and MMs were analyzed in Section 4.7.13 of the FEIR. The CPUC determined that the approved Project would have a significant and unavoidable impact on transportation and traffic.

#### 3.18.2.1 Conflict with a Plan for Performance of the Circulation System

The Proposed Project Modification would require one to two construction vehicles at each work location per day, and approximately three to four personal worker vehicles. The Proposed Project Modification would generate approximately 12 vehicle trips during the 2-week construction period. The additional vehicle activity on roads near the Proposed Project Modification would not exceed any screening criteria for evaluation of the circulation system, and the impact on transportation would be less than significant.

#### 3.18.2.2 Impact on Air Traffic

The Proposed Project Modification would not install any new structures or transmission lines. No impact on air traffic would occur.

#### 3.18.2.3 Impact on Traffic Hazards

Heavy equipment used during construction would enter and exit the work area from publicly accessible roads. The roads adjacent to the Proposed Project Modification access roads include high speed roads, and the slow travel of heavy trucks and vehicles entering and existing the work area could pose a hazard to motorists, bicyclists and pedestrians. Impacts from the traffic hazard is potentially significant. SDG&E would implement all applicable APMs and MMs contained in the FEIR. Implementation of a Construction Transportation Management Plan in accordance with MM Traffic-1 would reduce impacts from construction hazards on vehicle, pedestrian and bicycle travel. The impact from traffic hazards would be less than significant with implementation of the mitigation measures contained in the FEIR.

#### 3.18.2.4 Impact on Emergency Access and Temporary Lane Closure Impacts on Traffic Flow

Short-term lane closures on public roads may be required for the installation of guard structures adjacent to the roadway. The impact of temporary lane closure on emergency access is addressed under Section 3.10.2.4, above. The impact of the lane closures on traffic flow, including bicycle and pedestrian access, is potentially significant because the lane closure could temporarily cause unsafe travel conditions for multiple modes of transit. SDG&E would implement all applicable APMs and MMs contained in the FEIR. A Construction Transportation Management Plan, including flaggers and safety measures, would be implemented in accordance with MM Traffic-1, lane closures would be limited to off-peak periods in accordance with MM Traffic-6 and advance notification of lane closures would be required in accordance with MM Traffic-7. The mitigation measures would reduce the potential for the project to affect traffic flow and cause unsafe driving conditions. Impacts on traffic flow as a result of lane closures would be less than significant with implementation of the mitigation measures contained in the EIR.

## 3 ENVIRONMENTAL ANALYSIS

### 3.18.3 Conclusion

The Proposed Project Modification would have a less-than-significant impact on traffic and transportation. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on traffic and transportation, and new mitigation measures would not be required.

## 3.19 TRIBAL CULTURAL RESOURCES

### 3.19.1 Environmental Setting

The Notice of Preparation for the Project was issued August 11, 2014. Assembly Bill (AB) 52, which requires consultation with Native American tribes, went into effect for projects filed after July 1, 2015. AB 52 consultation is not required for an EIR addendum or for a project initiated prior to AB 52. For the purpose of analyzing the Proposed Project Modification, tribal cultural resources would consist of prehistoric resources that are eligible for listing on the CRHR or any resources identified by the Sacred Land File search. A record search and field survey were conducted within the Proposed Project Modification area to define cultural resources, including potential tribal cultural resources. Refer to Section 3.6.1 above for further information on existing CRHR eligible prehistoric resources in the vicinity of the Proposed Project Modification. No tribal cultural resources are known to occur within the Proposed Project Modification area based on a search of the Sacred Lands File.

### 3.19.2 Environmental Impacts and Mitigation

There are no known tribal cultural resources within the Proposed Project Modification work areas; therefore, the Proposed Project Modification would not impact any known tribal cultural resources. Similar to the Project, the Proposed Project Modification could result in a new significant impact if previously unknown tribal cultural resources are impacted during construction activities.

The Proposed Project Modification would require minimal ground disturbance. Installation of the guard structures would require auguring to depths of 6 to 8 feet. Some of the excavations would occur along developed roads, which have a low potential for buried tribal cultural resources. Installation of guard structures at four locations would have the potential to encounter, damage, or destroy previously undiscovered tribal cultural resources and cause a potentially significant impact on the resource. SDG&E would implement all applicable APMs and MMs contained in the FEIR. Implementation of MM Cultural-1 would require SDG&E to have a Native American monitor on site when working in areas that are sensitive for tribal cultural resources. MM Cultural-1 also requires flagging and avoiding and tribal cultural resources encountered during construction. The impact on tribal cultural resources would be less than significant with implementation of the mitigation measures contained in the FEIR.

### 3.19.3 Conclusion

The Proposed Project Modification would have a less-than-significant impact on tribal cultural resources with implementation of the mitigation measures contained in the FEIR. The Proposed

### 3 ENVIRONMENTAL ANALYSIS

Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on tribal cultural resources, and new mitigation would not be required.

#### 3.20 UTILITIES AND SERVICE SYSTEMS

##### 3.20.1 Environmental Setting

The Proposed Project Modification SDG&E ROW. Other electric lines, a gas pipeline, and telephone lines are located within the transmission corridor adjacent to the Proposed Project Modification.

##### 3.20.2 Environmental Impacts and Mitigation

The approved Project impacts on utilities and applicable APMs and MMs were analyzed in Section 4.17.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on utilities with implementation of the mitigation measures contained in the FEIR.

###### 3.20.2.1 Impact on Wastewater Treatment, Water Treatment, and Stormwater Drainage Facilities

The Proposed Project Modification would not generate any wastewater. No stormwater drainage facilities are located in the Proposed Project Modification area and the modification activities would not affect stormwater drainage. The Proposed Project Modification would not create demand for water and would not impact water treatment facilities. No impact on wastewater treatment, water treatment, or stormwater facilities would occur.

###### 3.20.2.2 Impact on Water Supply

The Proposed Project Modification would not create a new demand for water. Water may be used for dust control, if needed during the 2-week duration of re-tensioning activities. No grading would occur. The amount of water used for dust control due to vehicle travel on existing access roads would be minimal, if any is required. The impact on water supply would be less than significant.

###### 3.20.2.3 Impact on Landfills and Solid Waste

As described in Section 2.2.8, components removed during the Proposed Project Modification would be recycled. The Proposed Project Modification would generate minimal solid waste associated with workers and components that cannot be reused or recycled. Management and disposal of solid waste would comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste, and no impact would occur. The impacts on landfill capacity would be less than significant.

###### 3.20.2.4 Cause Damage or Deterioration of Utility Pipelines

One gas pipeline and overhead telecommunicate lines are located within the transmission corridor adjacent to the Proposed Project Modification. No ground-disturbing activities would occur above the buried gas pipeline and no telecommunication lines would be affected by the re-tensioning activities. Re-tensioning of the existing transmission line would not affect the

## 3 ENVIRONMENTAL ANALYSIS

operation of the transmission line and would not cause additional risk of corrosion on nearby metallic pipelines due to alternative currents. No impact from damage or deterioration of utility pipelines would occur.

### 3.20.3 Conclusion

The Proposed Project Modification would have a less-than-significant impact on utilities. The Proposed Project Modification would not result in a new impact, or increase the severity of a previously analyzed impact on utilities.

## 3.21 WILDFIRE

### 3.21.1 Environmental Setting

Wildland fire protection in California is the responsibility of the State (State Responsibility Area [SRA]), local government (Local Responsibility Area [LRA]), or the federal government (Federal Responsibility Area). The California Department of Forestry and Fire Protection (CAL FIRE) provides California Fire Hazard Severity Zone Maps, which classify who has the primary financial responsibility for preventing and suppressing fires. Lands are removed from SRA when they become incorporated by a city, are changed in ownership to the federal government, become more densely populated, or are converted to intensive agriculture that minimizes the risk of wildfire. LRA is defined as land managed by local agencies and includes incorporated cities, cultivated agriculture lands, and portions of the desert. State law requires that all local jurisdictions identify very high fire hazard severity zones within their areas of responsibility.

The CPUC developed a Fire-Threat Map applicable to management of fire safety for electrical lines under D.17-01-009. The fire threat maps were developed to identify areas where there is an increased risk of utility associated wildfires. The fire threat maps were developed by the CPUC through a multi-year evaluation of fire risk data by CalFire and other stakeholders. The Fire-Threat maps were adopted on January 19, 2018.

California Fire Hazard Severity Zone Maps show that the Proposed Project Modification area is not located within an SRA. The portion of the Proposed Project Modification within the boundaries of MCAS Miramar is located within the Federal Responsibility Area. The portion of the Proposed Project Modification located outside of the boundary of MCAS Miramar is located within the Local Responsibility Area (San Diego County, 2019). The San Diego County Emergency Operations Plan (EOP), developed to address wildfires and other emergencies, was approved by the County Board of Supervisors in September 2018. The Proposed Project Modification would be located within the Peñasquitos Fireshed and within a Very High Fire Hazard Severity Zone (San Diego County, 2018). The CPUC Fire-Threat Map shows that the Proposed Project Modification is also located in a Tier II fire threat area, where there is an elevated risk of wildfire.

## 3 ENVIRONMENTAL ANALYSIS

### 3.21.2 Environmental Impacts and Mitigation

The approved Project impacts on fire and fuels management and applicable APMs and MMs were analyzed in Section 4.12.12 of the FEIR. The CPUC determined that the approved Project would have a less-than-significant impact on fire and fuels management with implementation of the mitigation measures contained in the FEIR.

The Proposed Project Modification would involve the use of construction equipment which would have the potential generate sparks, which could ignite wildfires. Due to the high fire hazard severity in the area, any ignition of a wildfire could spread rapidly and cause a significant fire hazard. SDG&E would implement all applicable APMs and MMs contained in the FEIR. APM FIRE-1 would require SDG&E to implement the Fire Prevention Plan, which identifies fire risks and fire prevention measures. Implementation of APM PS-6 would require fire patrol monitoring under the Project-specific Fire Prevention Plan. Implementation of MM Fire-1 would require SDG&E to adhere to the Project-specific Fire Prevention Plan. MM Fire-3 requires water tanks or water trucks at active construction areas. The risk of impacts from wildfire would be less than significant with implementation of the APMs and mitigation measures contained in the FEIR.

### 3.21.3 Conclusion

The Proposed Project Modification would have a less-than-significant impact on wildfire with implementation of the mitigation measures contained in the Final EIR. The Proposed Project Modification would not result in a new impact or increase the severity of a previously analyzed impact on wildfire (fire and fuels management), and new mitigation would not be required.

## 3.22 OTHER CEQA REQUIREMENTS

Growth inducing impacts, significant and irreversible impacts, and significant and unavoidable impacts of the approved Project were included in Chapter 7 of the FEIR, pursuant to California Public Resources Code § 21100.

### 3.22.1.1 Growth Inducing Impact

The Proposed Project Modification would not create any permanent jobs and would not change the capacity of the existing transmission line. The Proposed Project Modification would have no growth inducing impacts.

### 3.22.1.2 Significant and Irreversible Changes

The Proposed Project Modification would involve temporary activities at an existing transmission line. The only potential activities that would be irreversible would be the use of non-renewable resources including fuels for construction equipment and vehicles. The Proposed Project Modification would not use a significant amount of fuel and the impact from use of non-renewable resources would be less than significant. The impact from use of non-renewable resources was analyzed in Section 7.4 and the Proposed Project Modification would not result in a new impact or increase the severity of the impact.

### 3.22.1.3 Significant and Unavoidable Impacts

The Proposed Project Modification would have no significant and unavoidable impacts.

## 4 CONCLUSION

### 4 CONCLUSION

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The Proposed Project Modification would not result in new significant impacts or increase the severity of previously identified impacts on the environment. No new mitigation measures are required to ensure that impacts would remain less than significant. No new information of substantial importance has been identified, and none of the conditions described in Sections 15162 and 15163 of the CEQA Guidelines that call for preparation of a subsequent EIR are present.

## 4 CONCLUSION

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## **APPENDIX A**

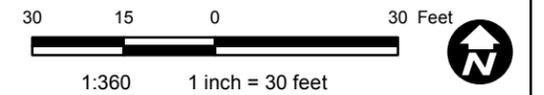
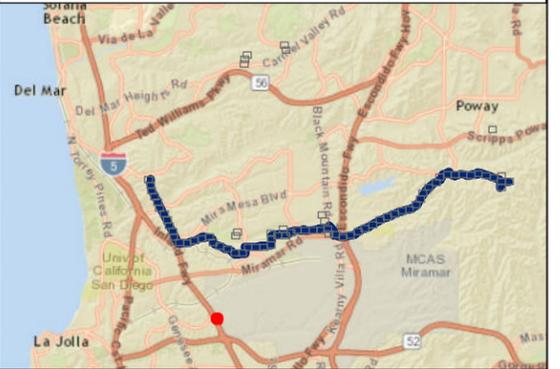
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### **Detailed Route Maps**



**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area

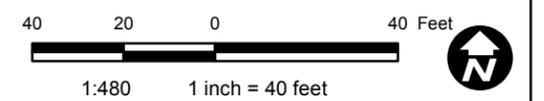
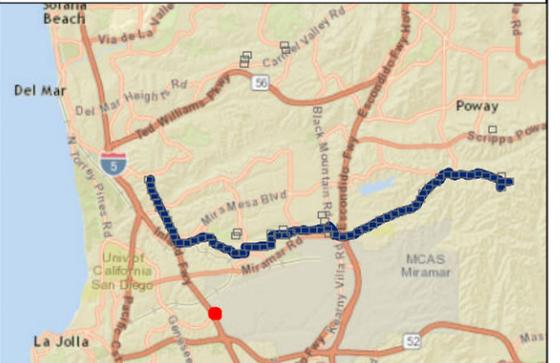


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479040**



**Legend**

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

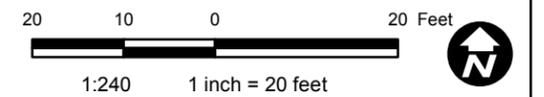
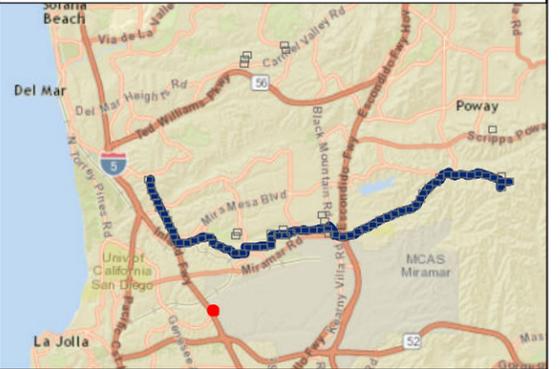


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479041**



**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area

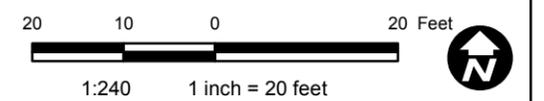
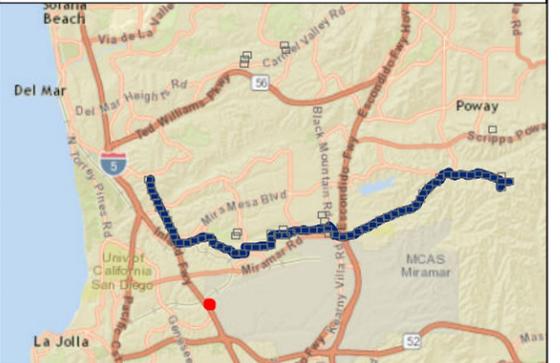


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479042**



**Legend**

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



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



Approximate location of steel plates  
for access road crossing

Rose Creek

GS-22

Z479044

Marine Corps Air Station Miramar

Marine Corps Air Station Miramar

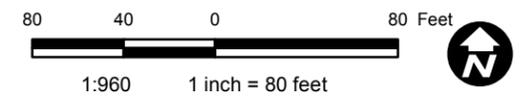
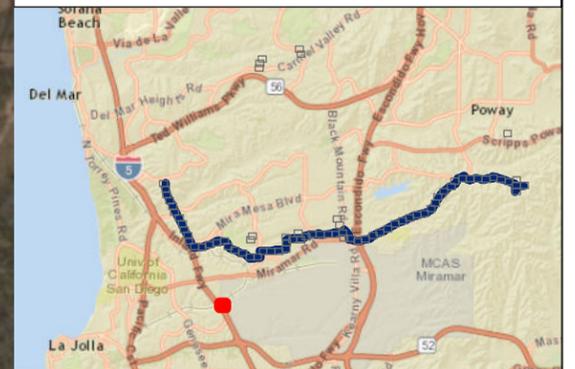
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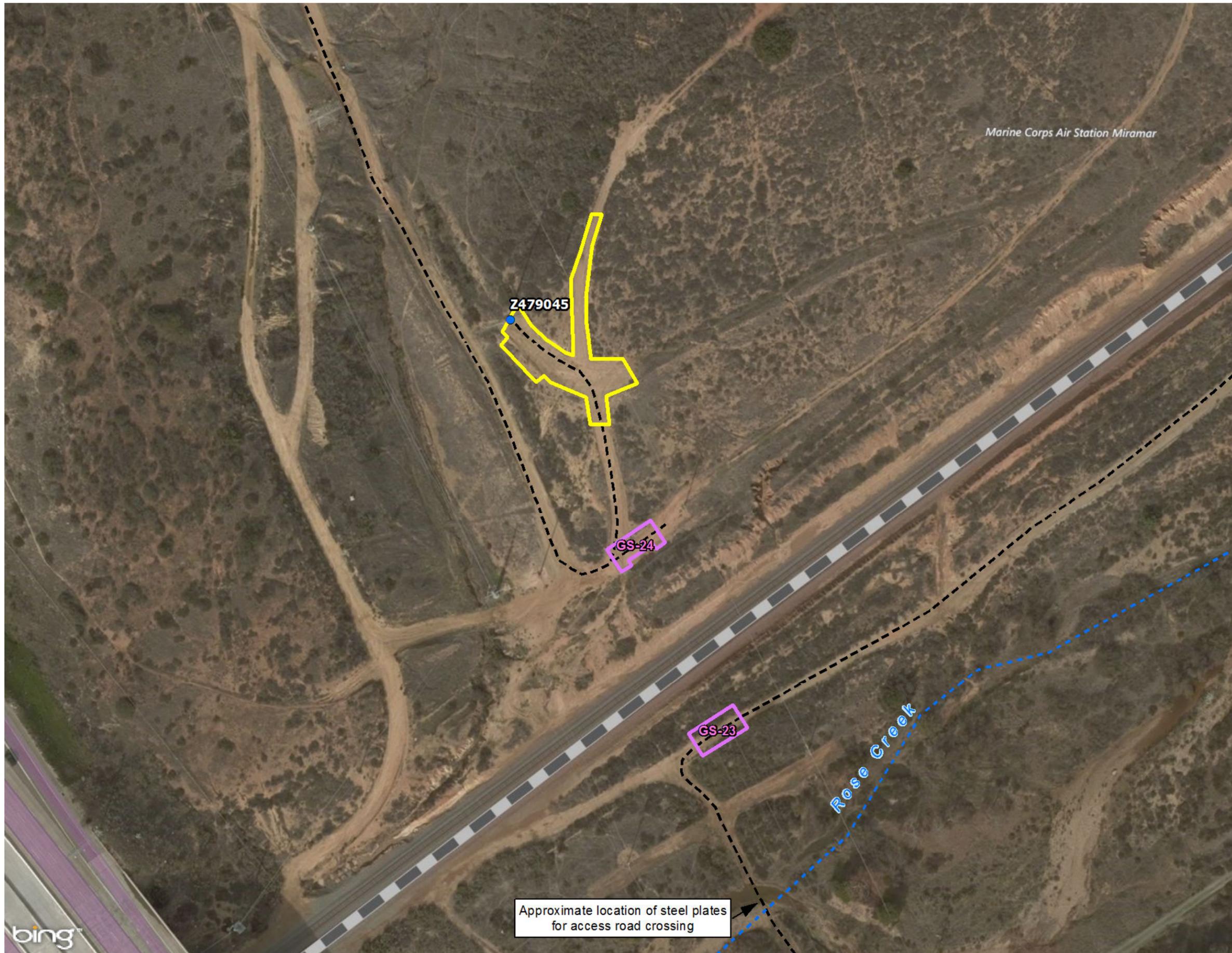
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**Legend**

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

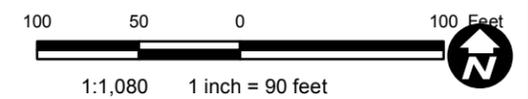
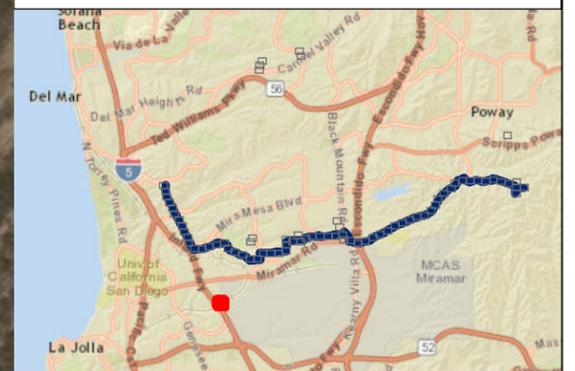


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479044**



**Legend**

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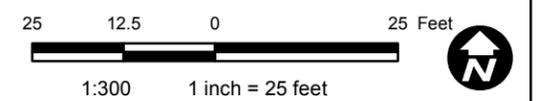
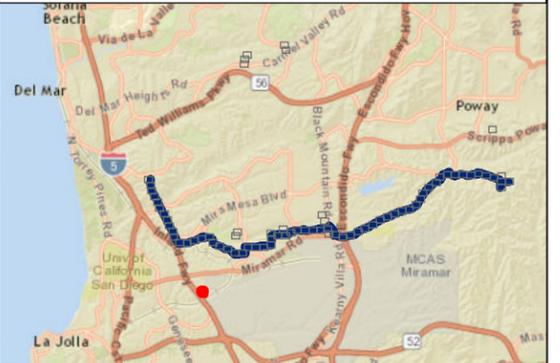


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479045**



**Legend**

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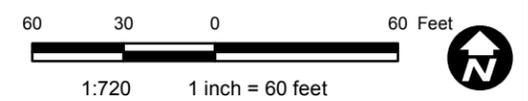
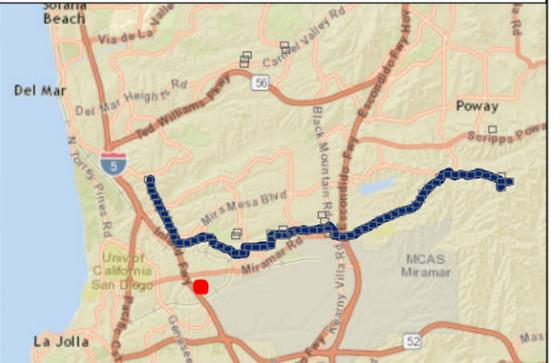


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479046**

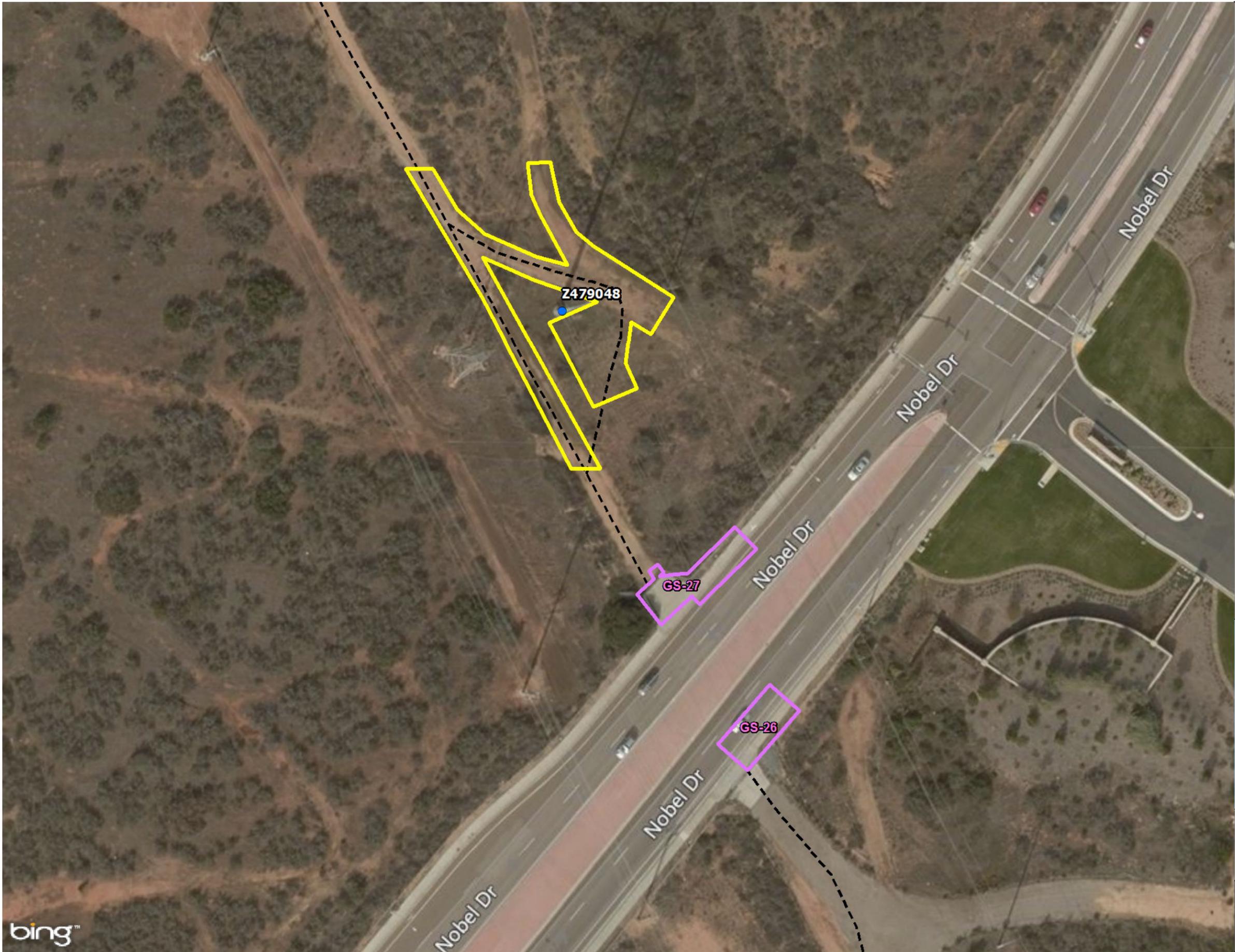


**Legend**

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

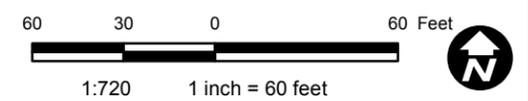
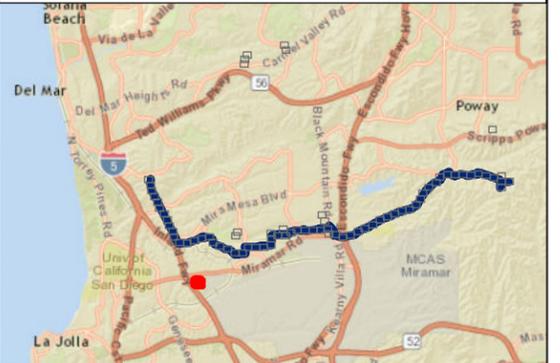


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479047**

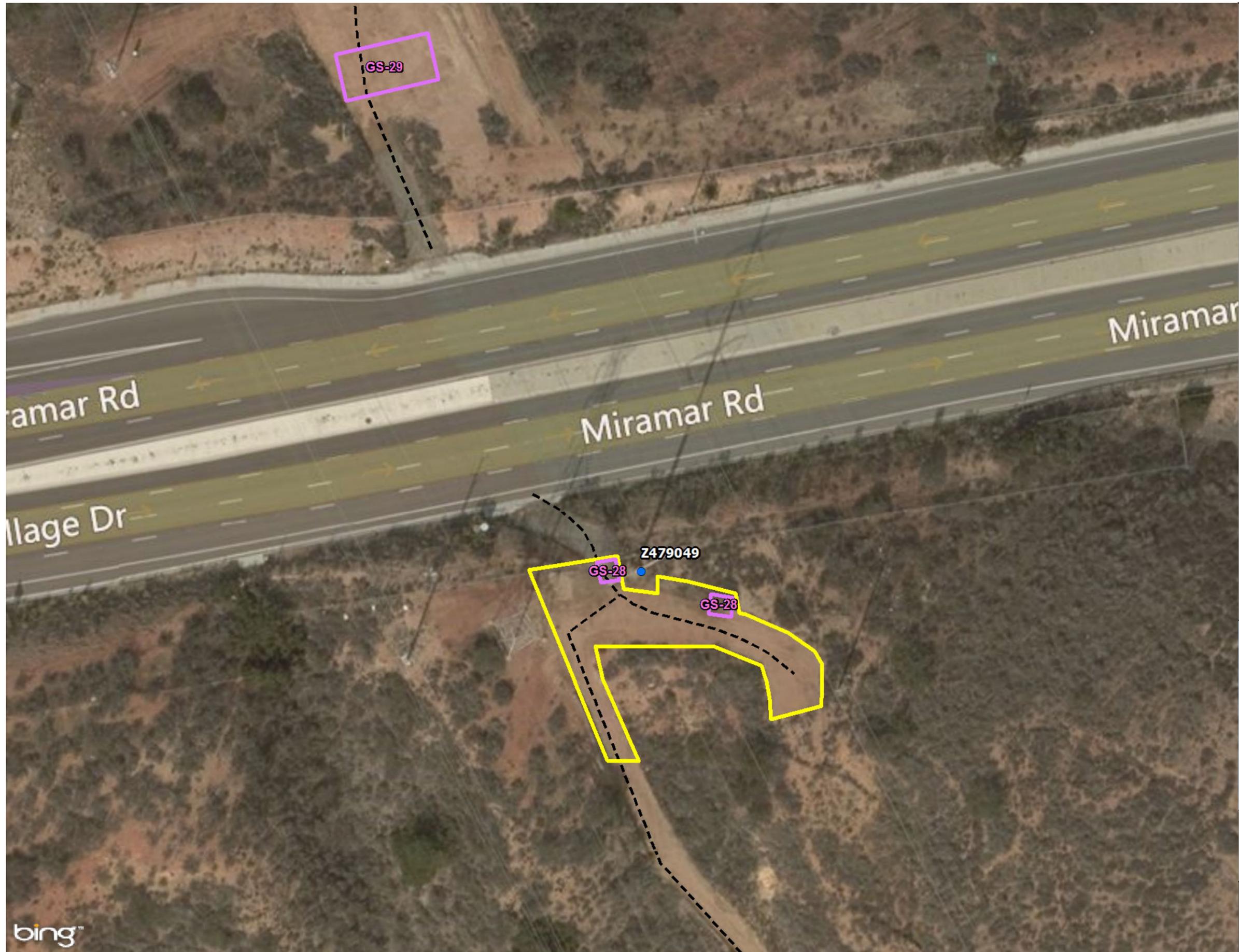


**Legend**

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- Temporary Work Area
- Guard Structure

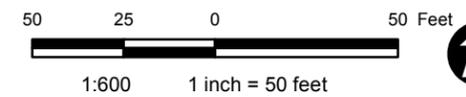
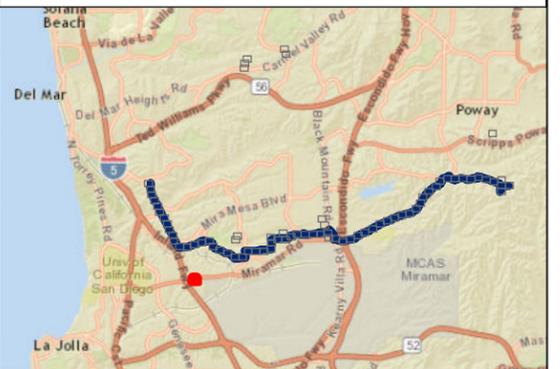


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479048**

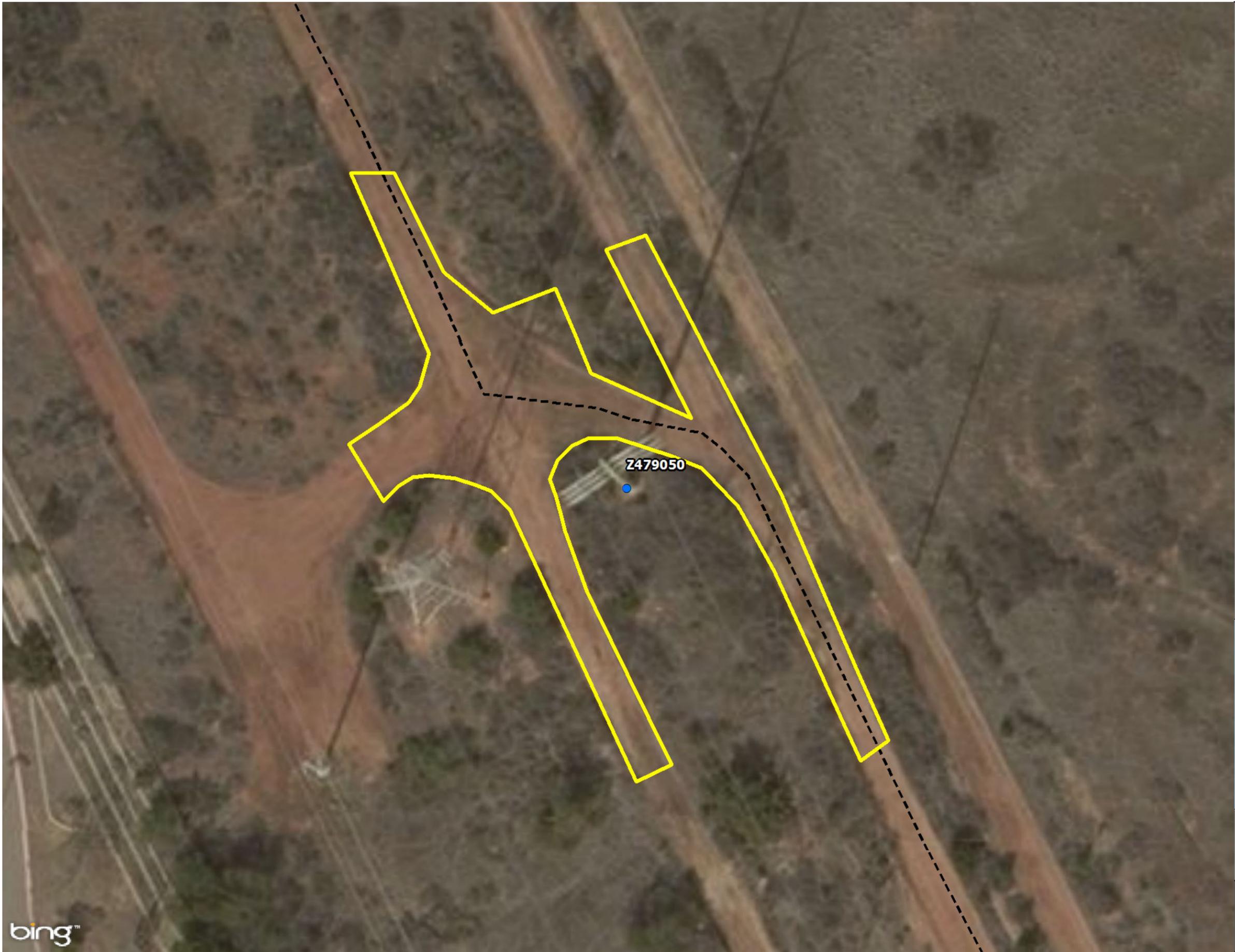


**Legend**

- MPR 8 Poles
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- Temporary Work Area
- Guard Structure

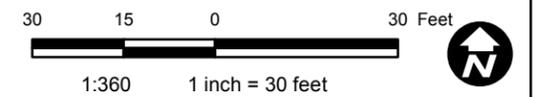
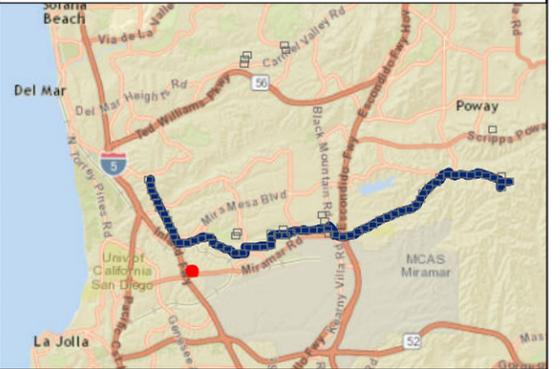


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479049**



**Legend**

- MPR 8 Poles
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- Temporary Work Area

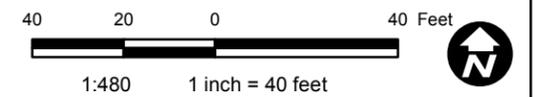
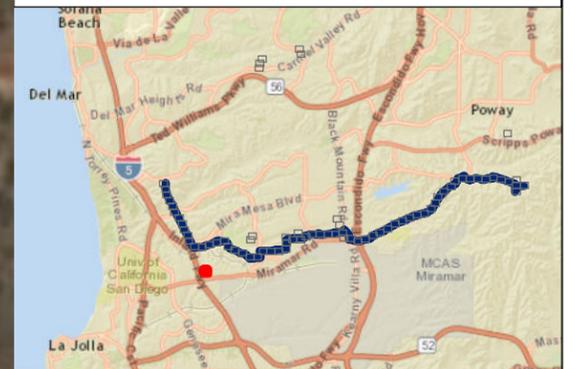


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479050**

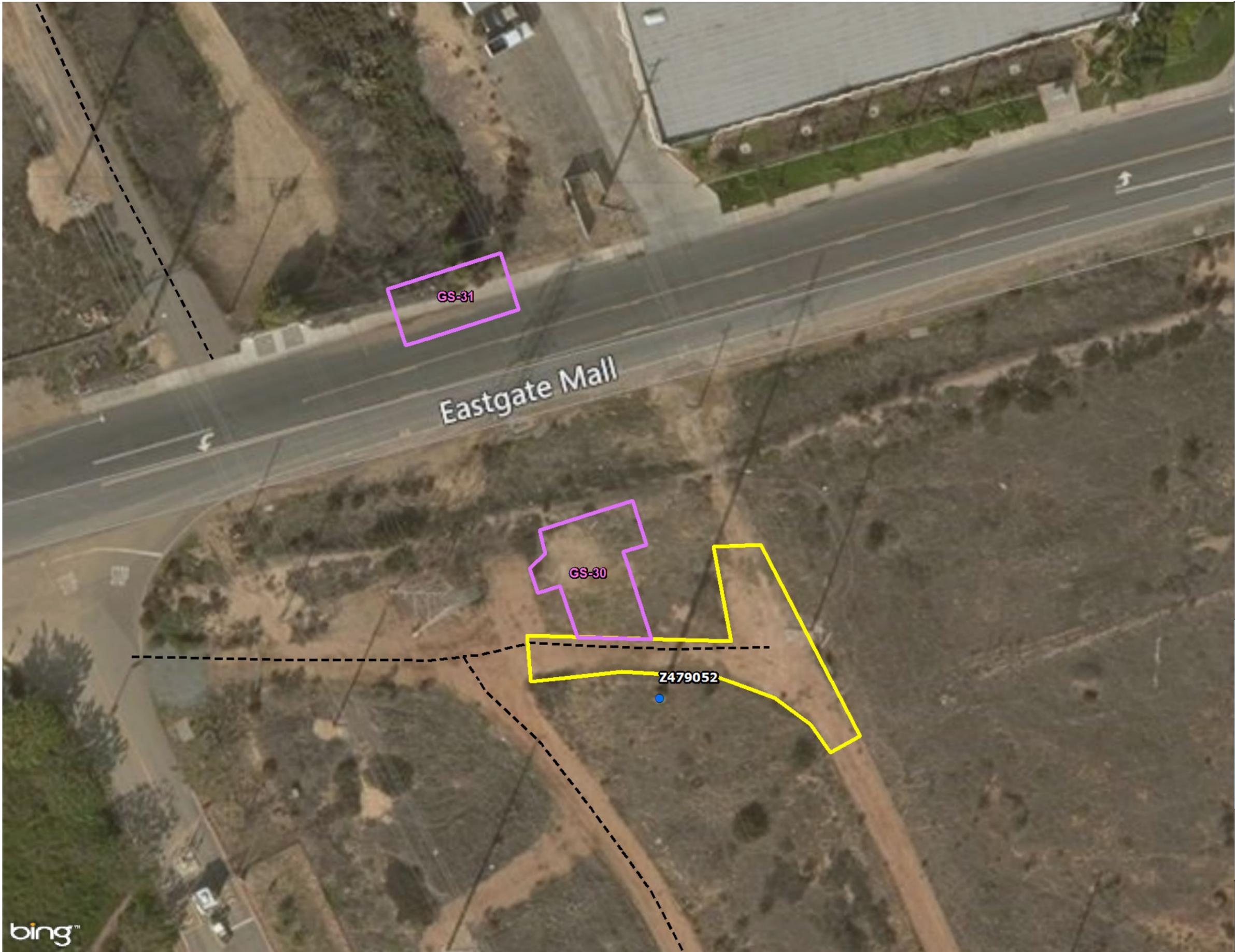


**Legend**

- MPR 8 Poles
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- Temporary Work Area

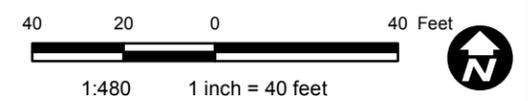
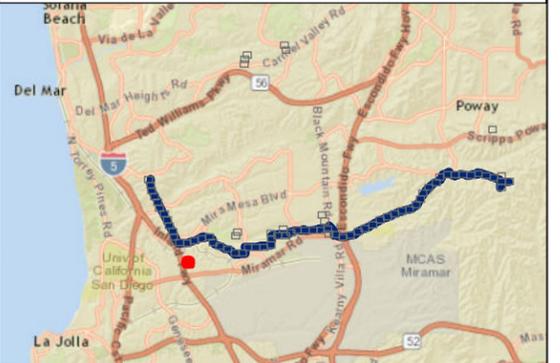


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479051**

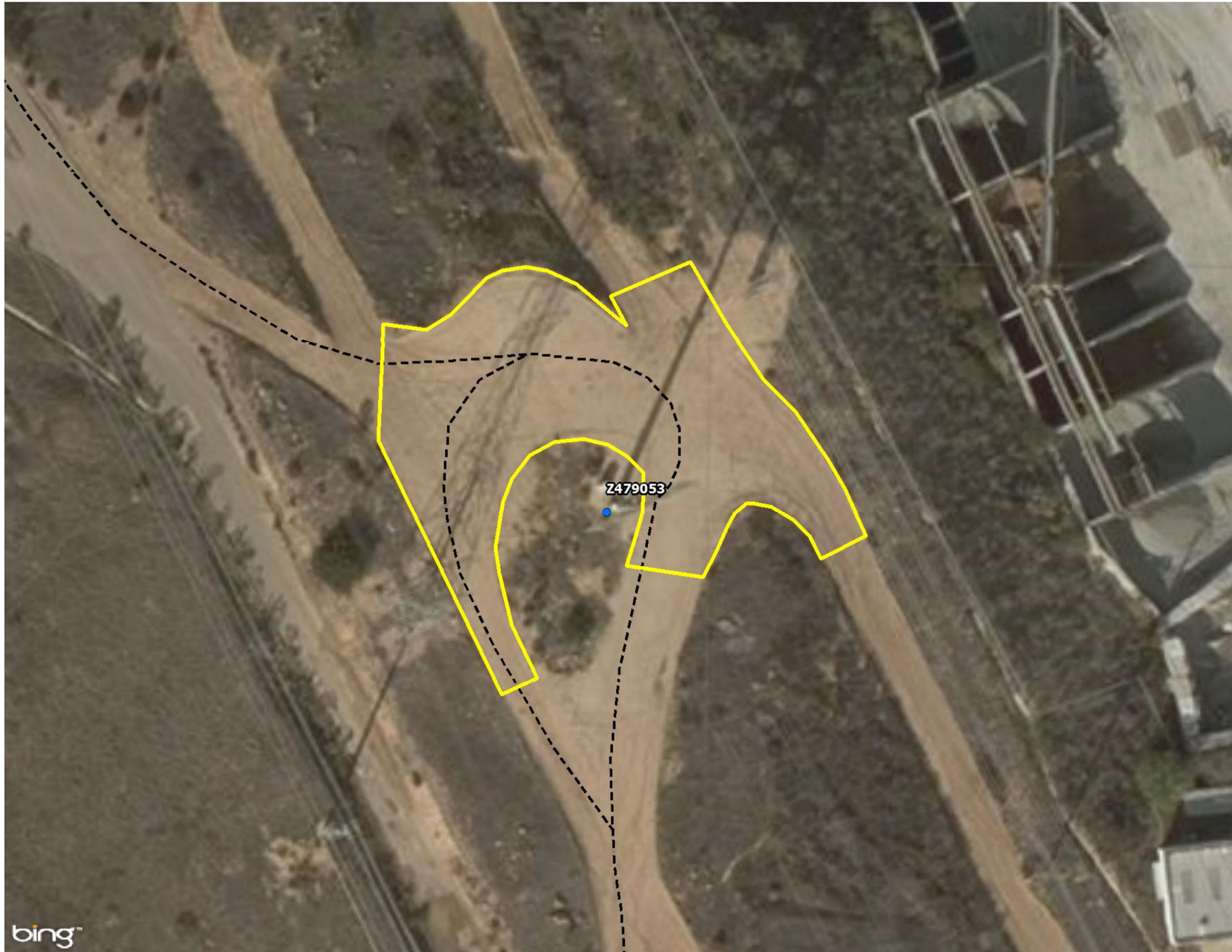


**Legend**

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

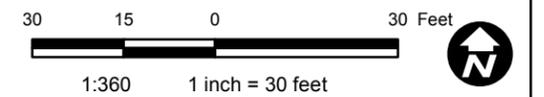
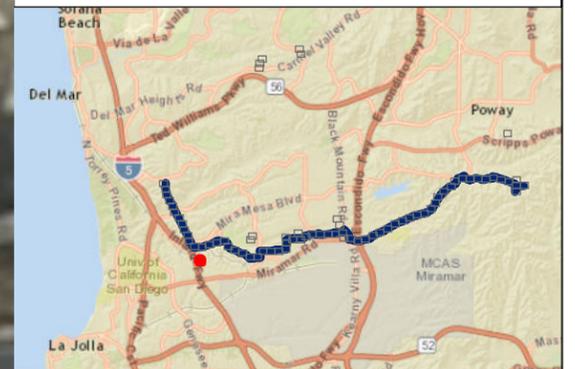


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479052**

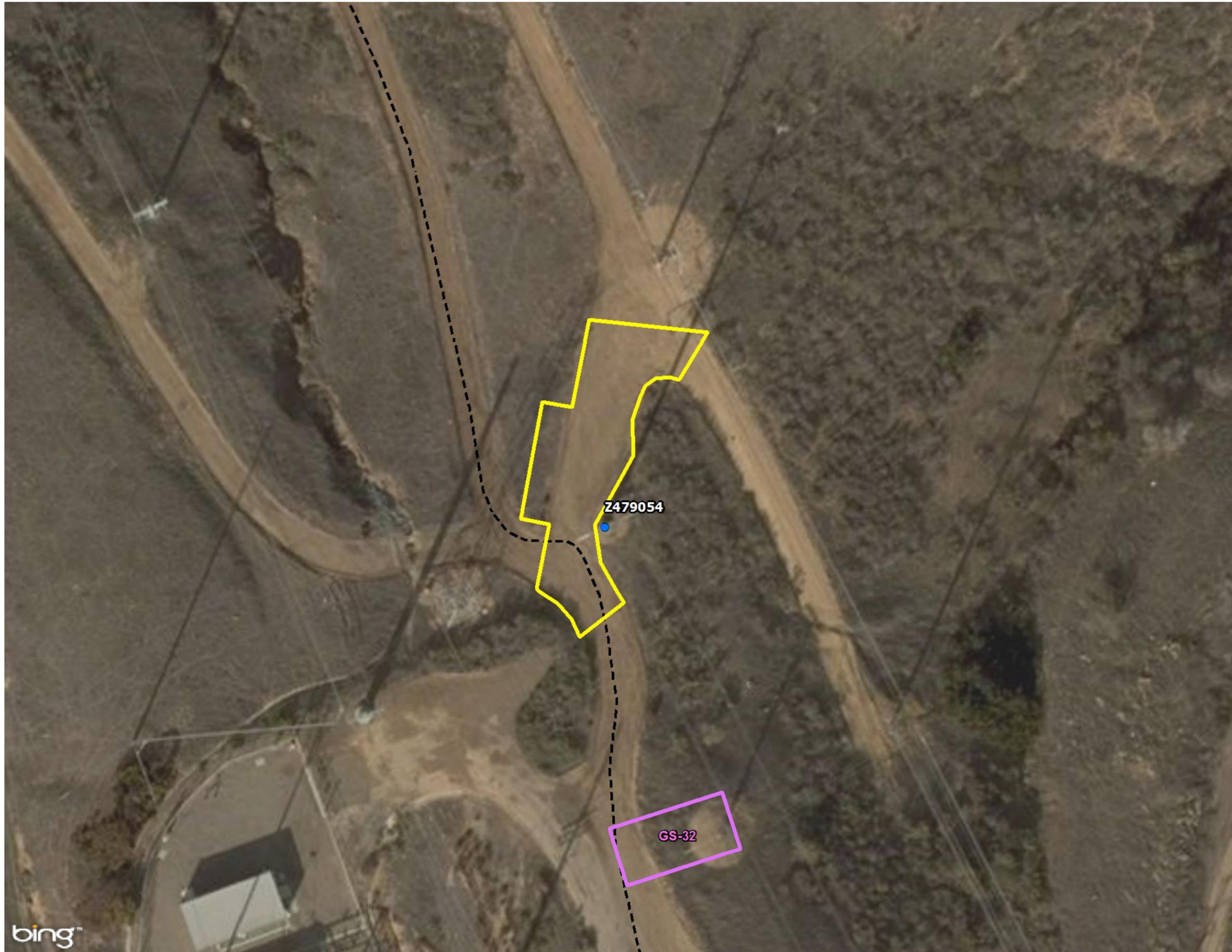


**Legend**

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

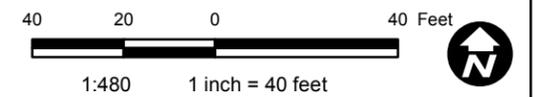
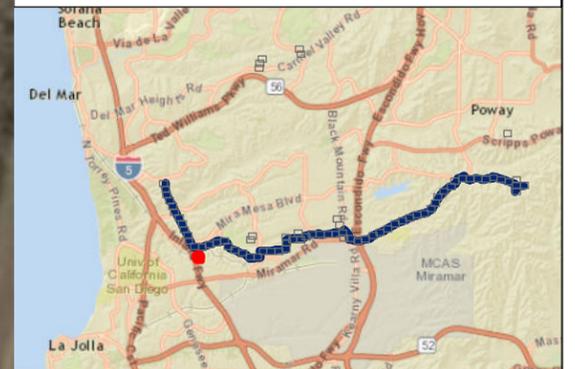


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479053**

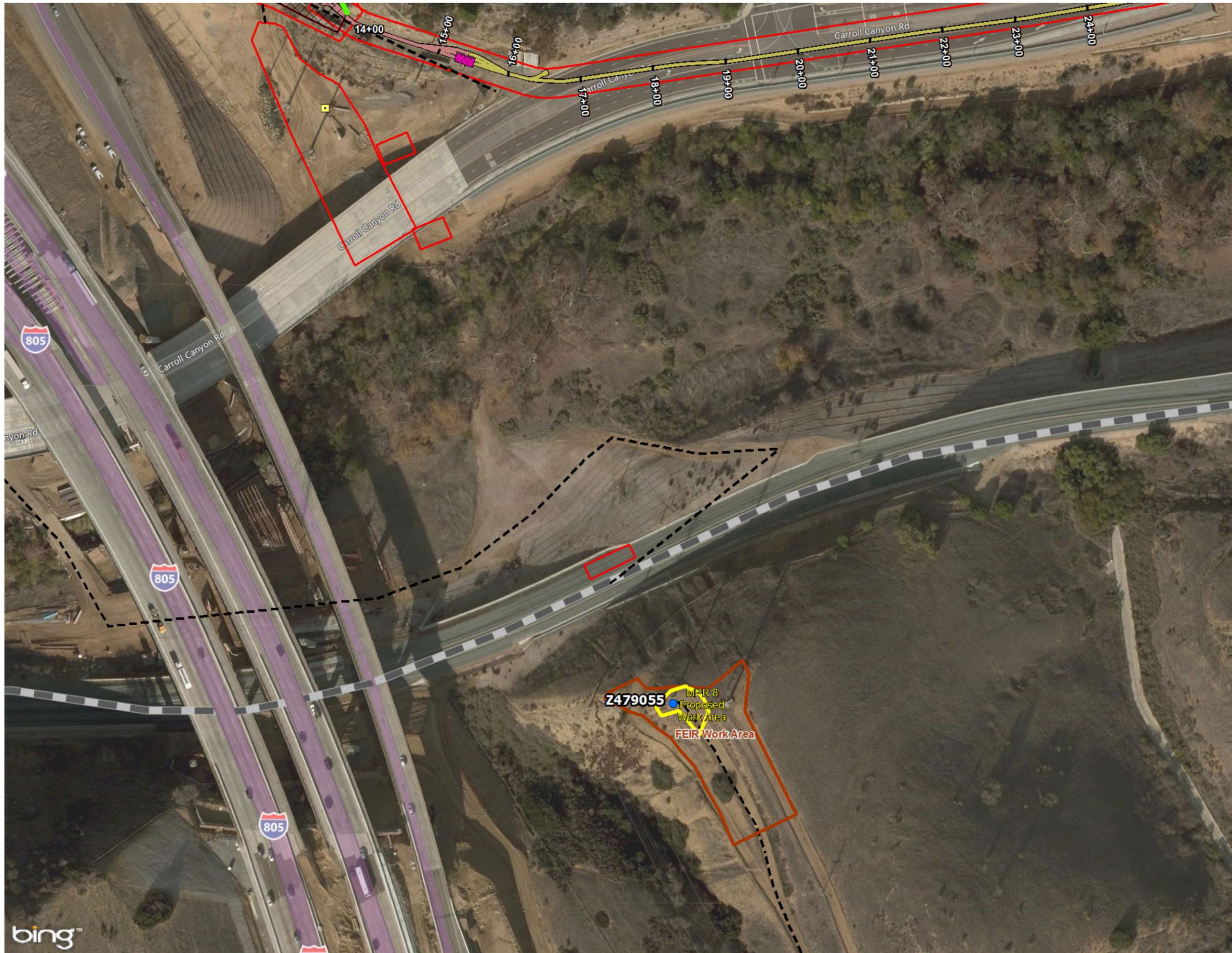


**Legend**

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

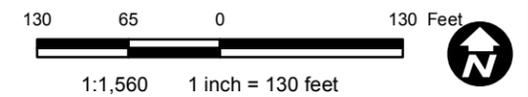
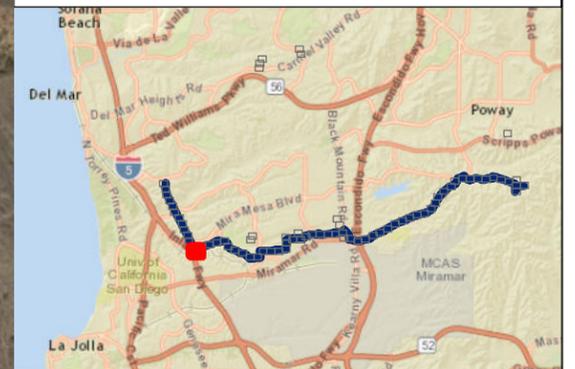


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Z479054**



**Legend**

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



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

## **APPENDIX B**

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### **Biological Resources**

## **APPENDIX B**

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### **Biological Resources**

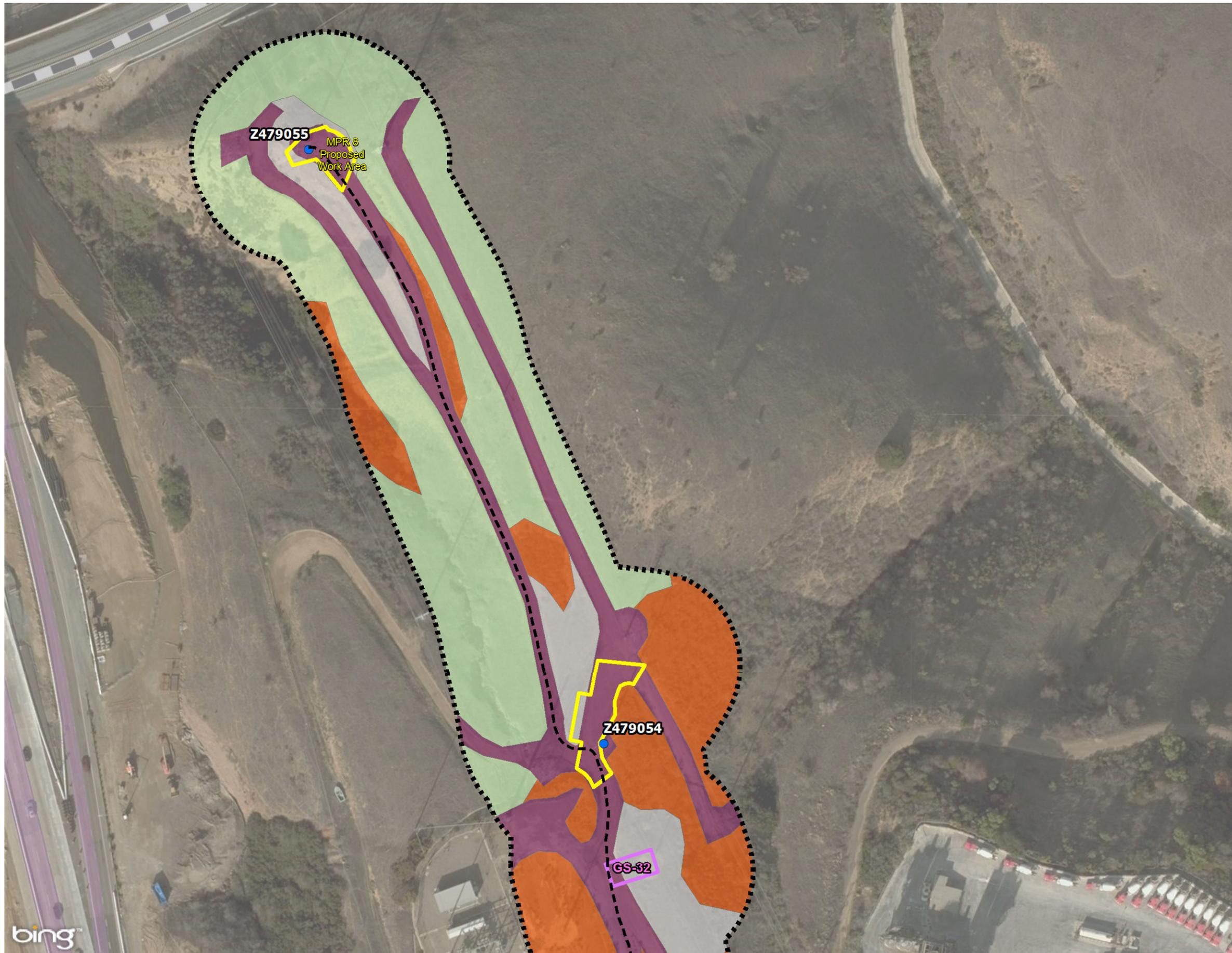
#### **Vegetation Maps**

**Vernal Pools and Wetlands Maps**

**Non-NCCP Special Status Plant Species Table**

**Biological Pre-Activity Survey Report**

**Photographs**

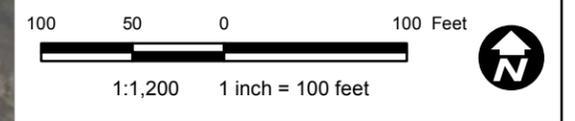
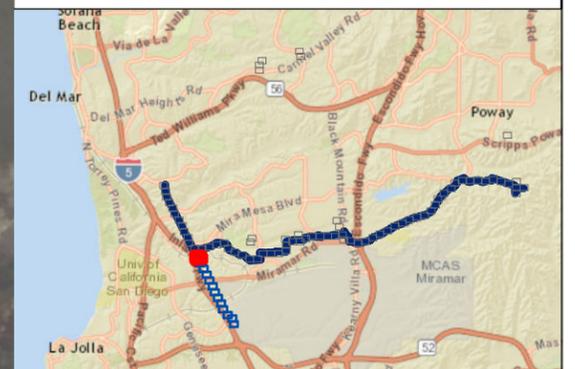


**Legend**

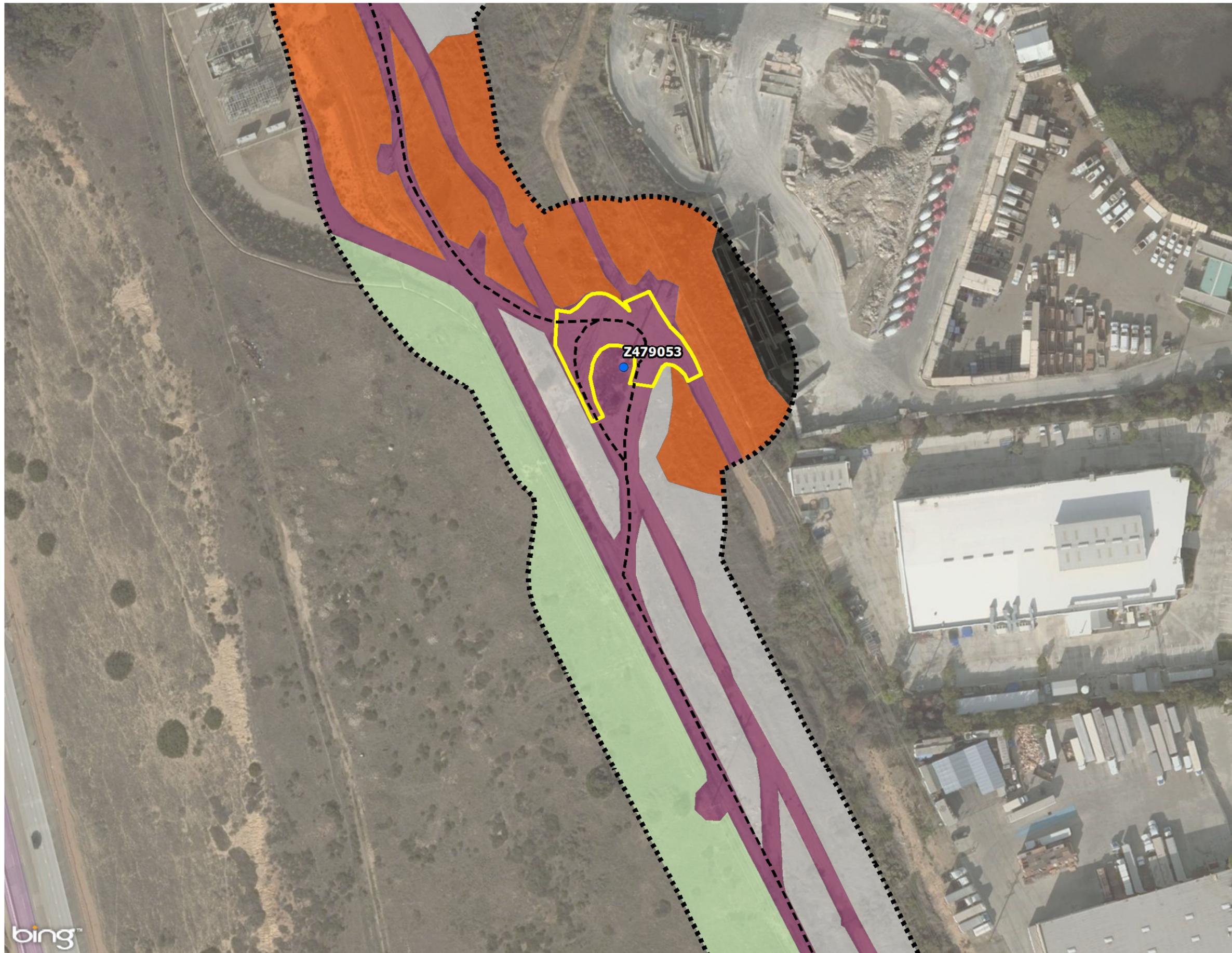
- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

**Vegetation Communities**

- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 1**

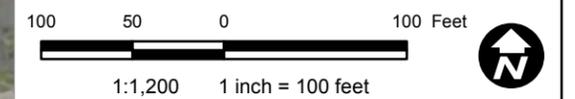
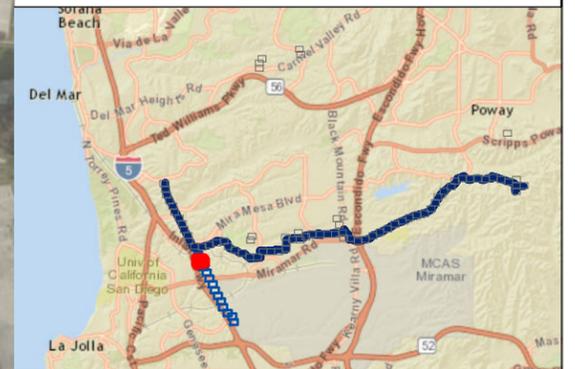


**Legend**

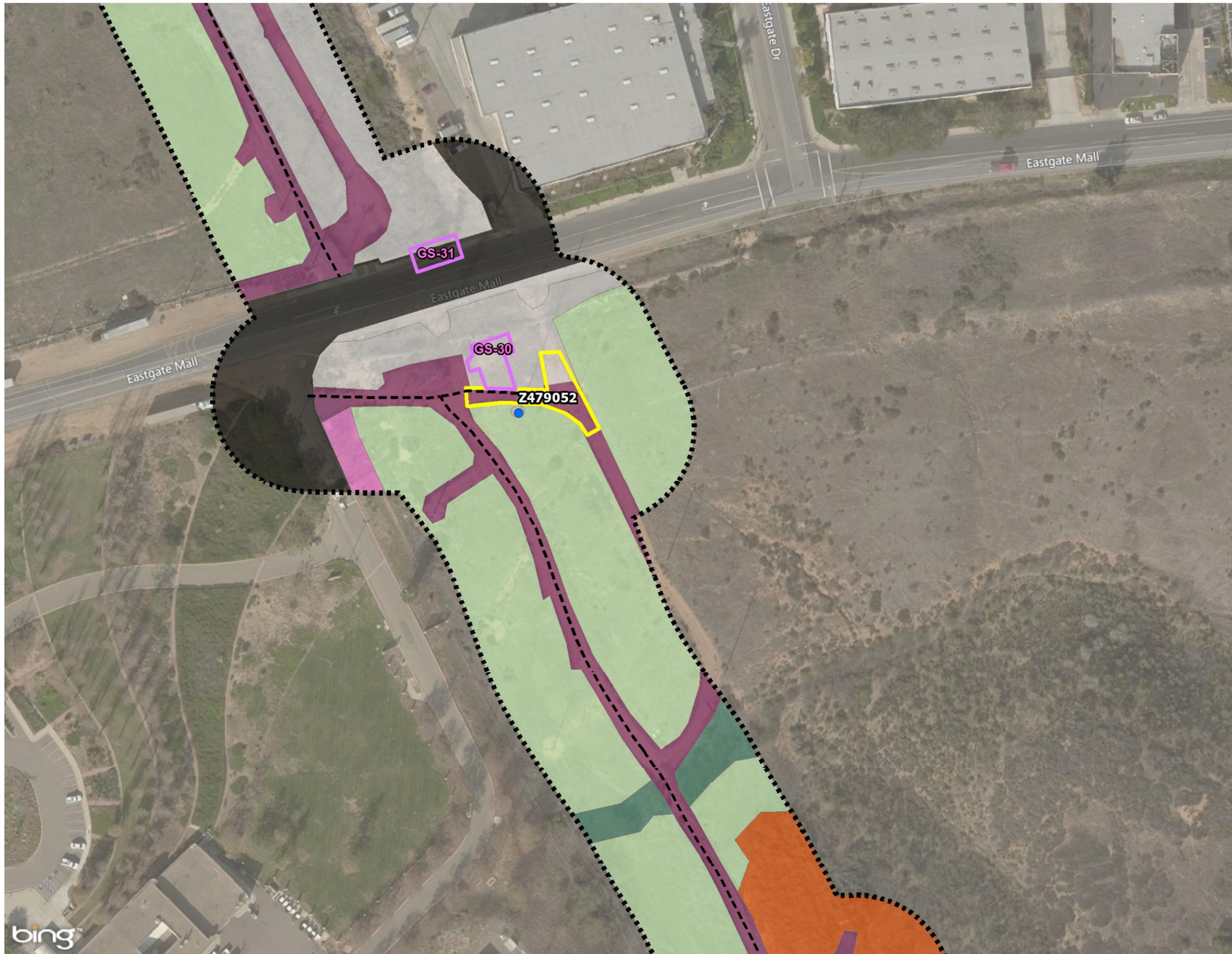
- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- ⋯ 100ft Buffer

**Vegetation Communities**

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



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 2**

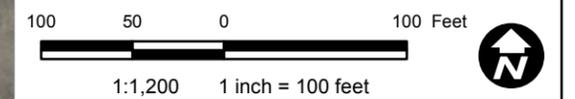
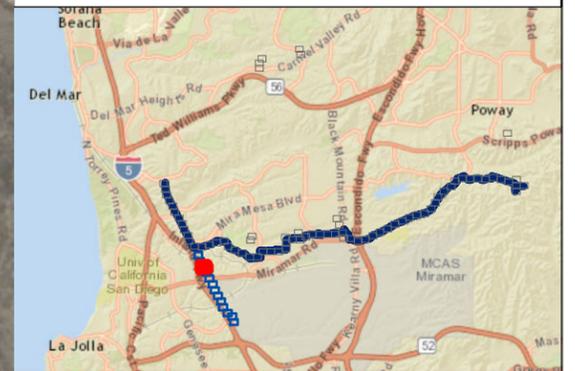


**Legend**

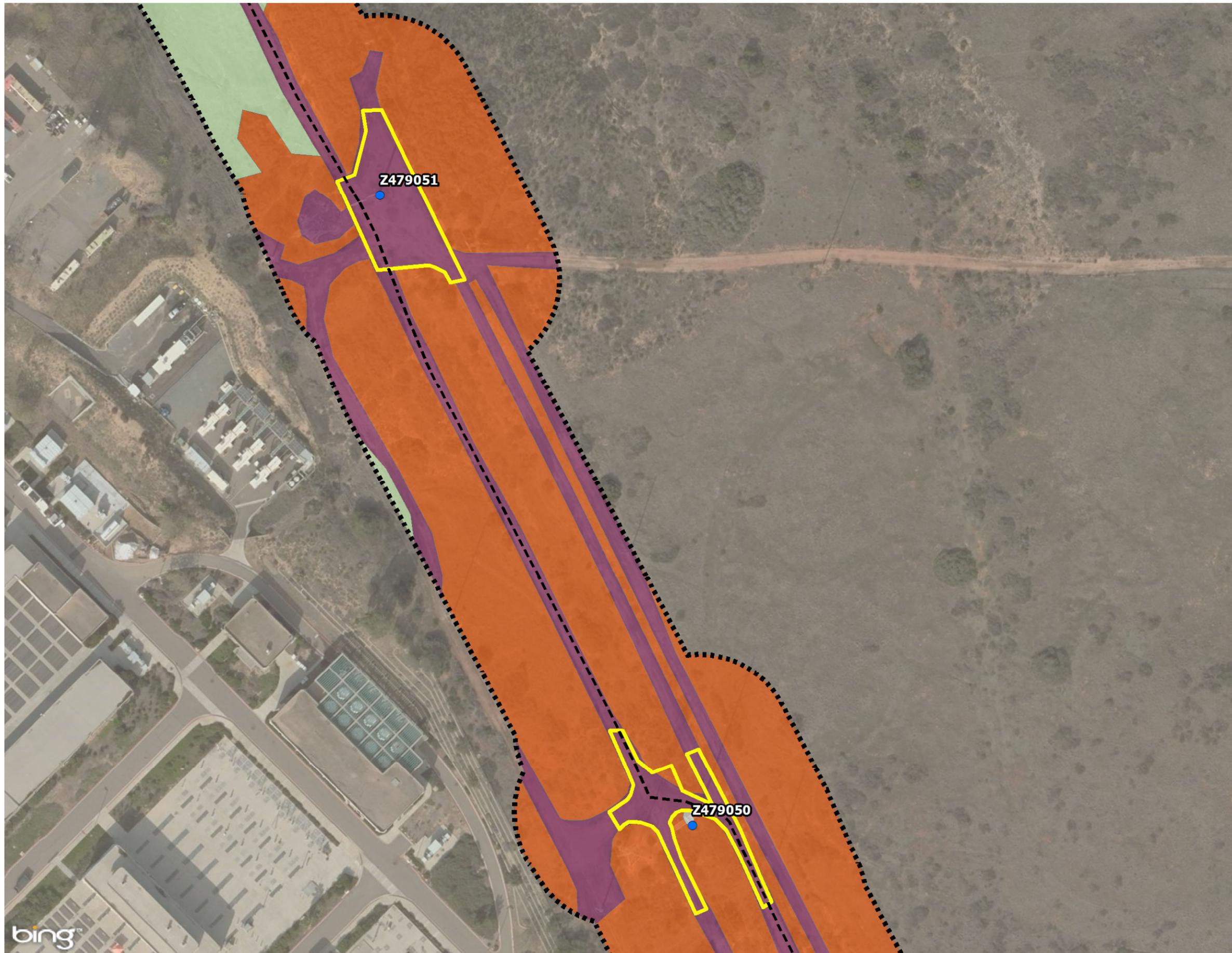
- MPR 8 Poles
- - - Access Road
- ▭ Temporary Work Area
- ▭ Guard Structure
- ▭ 100ft Buffer

**Vegetation Communities**

- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland
- Ornamental Landscaping
- Pavement - Asphalt or Concrete
- Riparian Scrub



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 3**

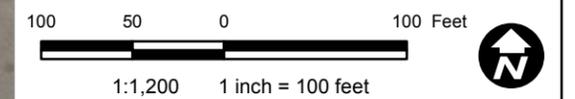
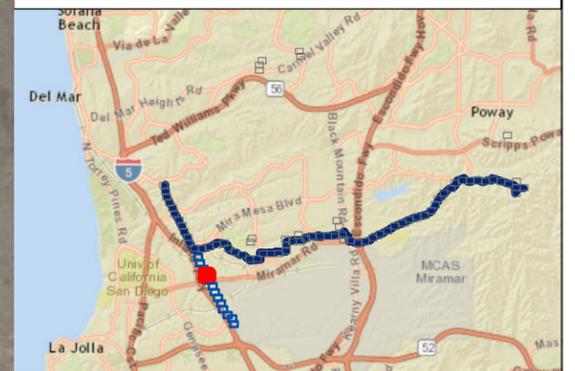


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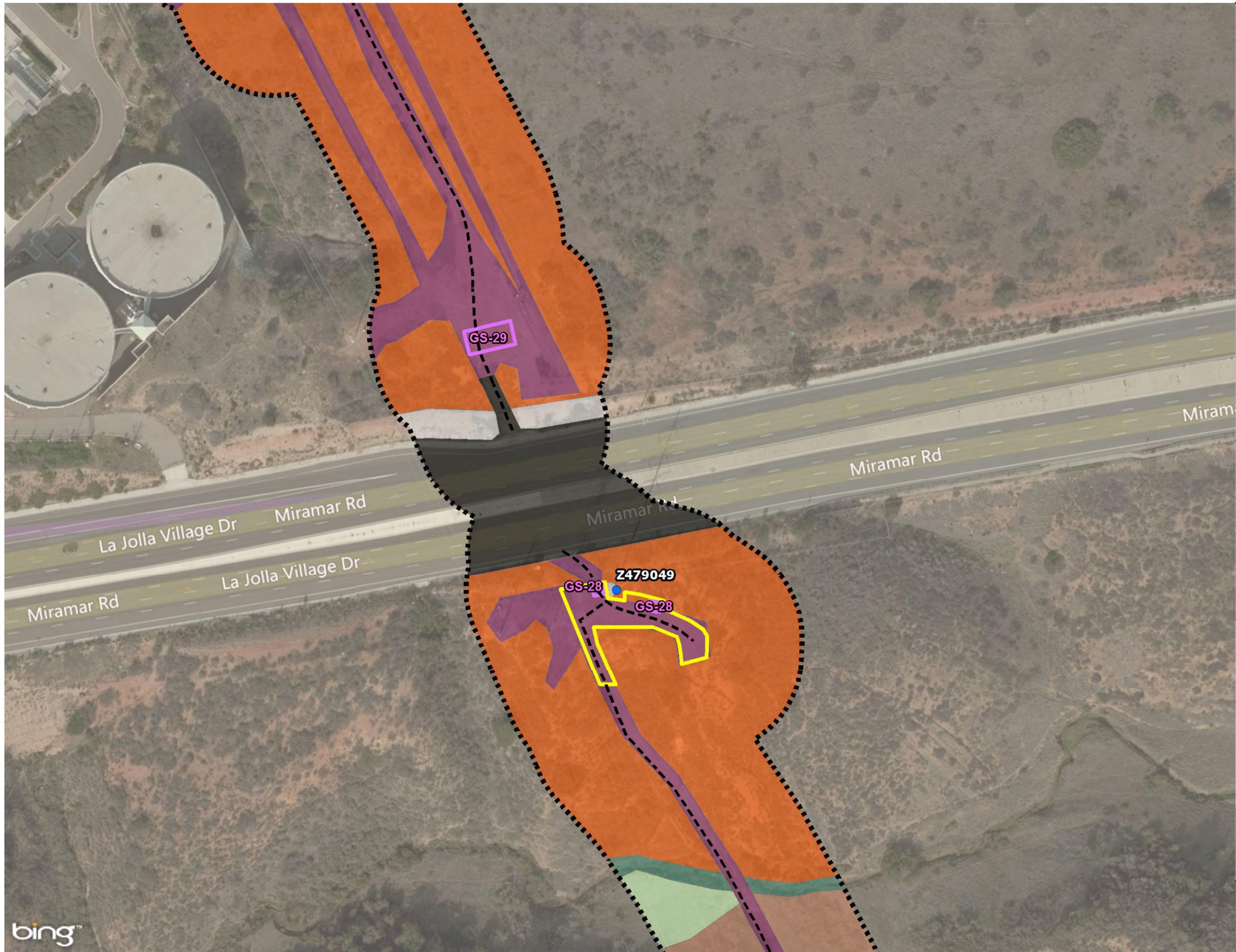
- MPR 8 Poles
- Access Road
- Temporary Work Area
- 100ft Buffer

**Vegetation Communities**

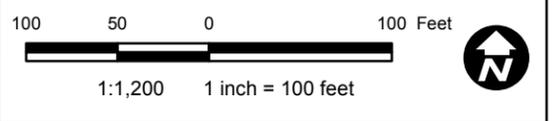
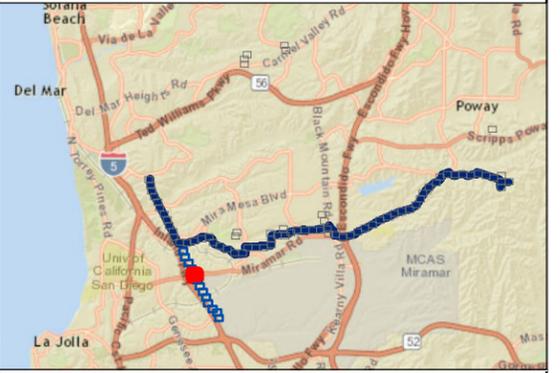
- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland



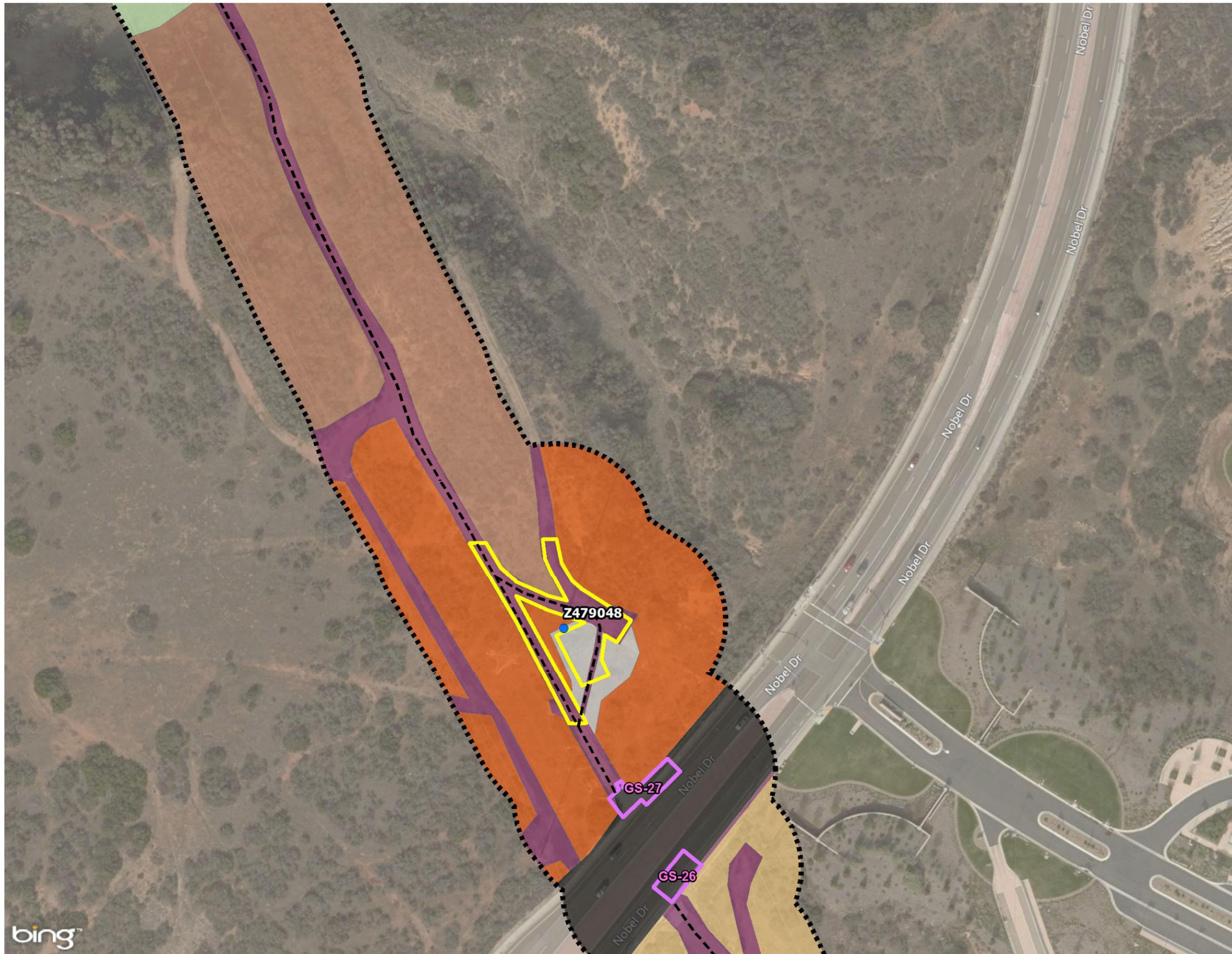
**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 4**



- Legend**
- MPR 8 Poles
  - - - Access Road
  - ▭ Temporary Work Area
  - ▭ Guard Structure
  - ▨ 100ft Buffer
- Vegetation Communities**
- Bare Ground
  - Coastal Sage Scrub
  - Coastal Sage/Chaparral Mix
  - Disturbed
  - Grassland
  - Pavement - Asphalt or Concrete
  - Riparian Scrub

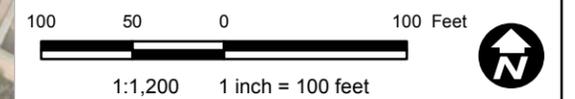
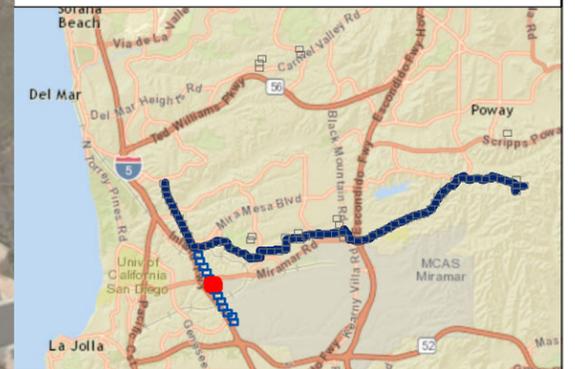


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 5**

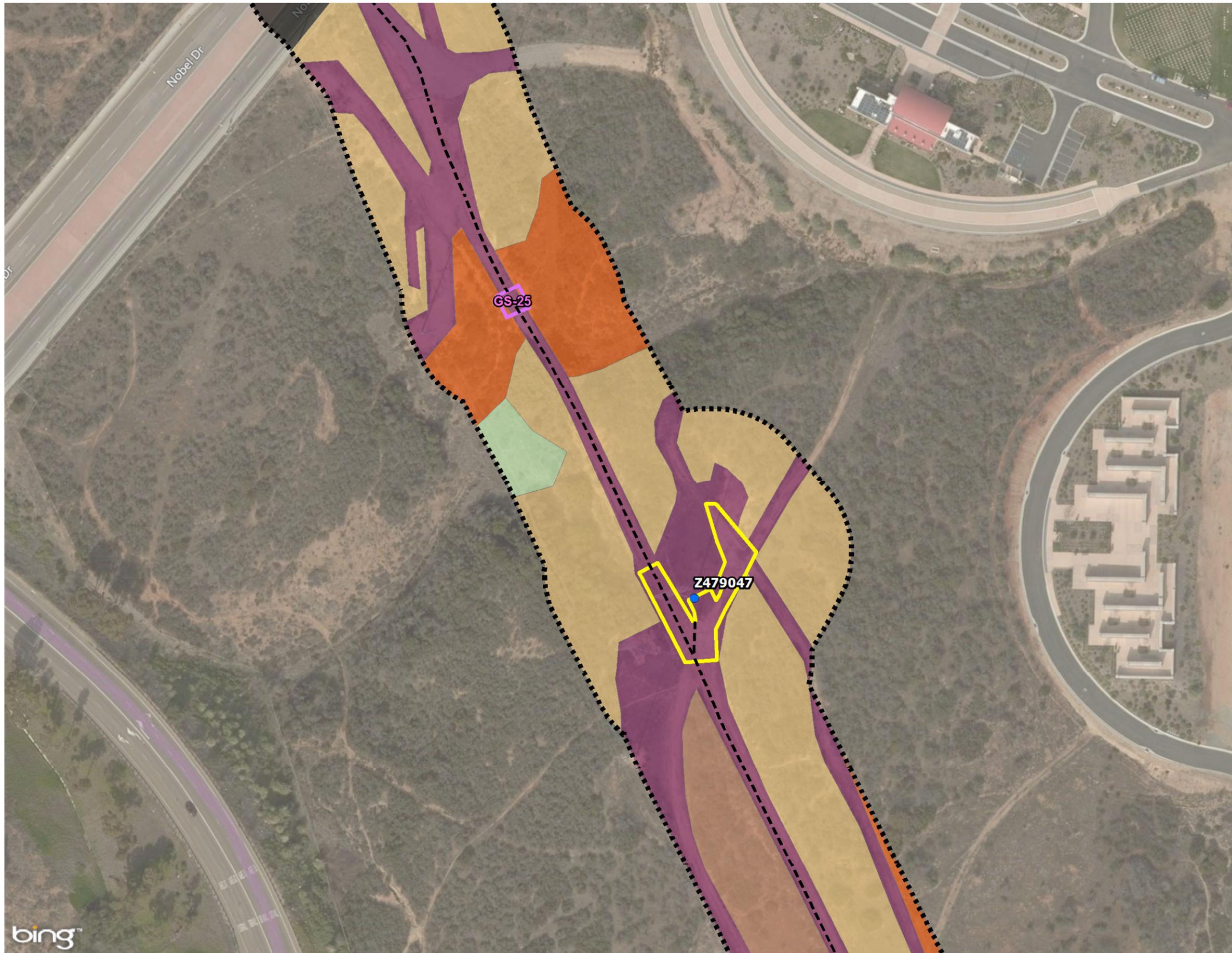


**Legend**

- MPR 8 Poles
  - Access Road
  - Temporary Work Area
  - Guard Structure
  - 100ft Buffer
- Vegetation Communities**
- Bare Ground
  - Chaparral
  - Coastal Sage Scrub
  - Coastal Sage/Chaparral Mix
  - Disturbed
  - Grassland
  - Pavement - Asphalt or Concrete

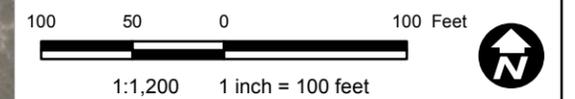
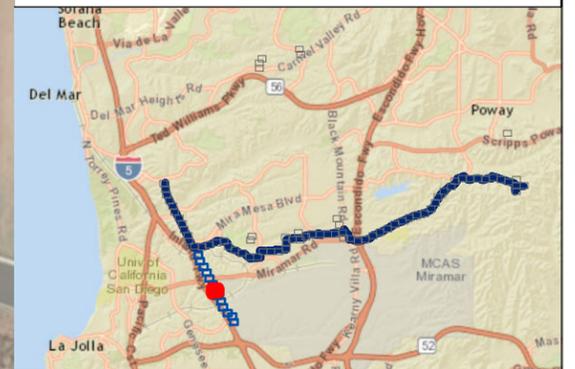


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 6**

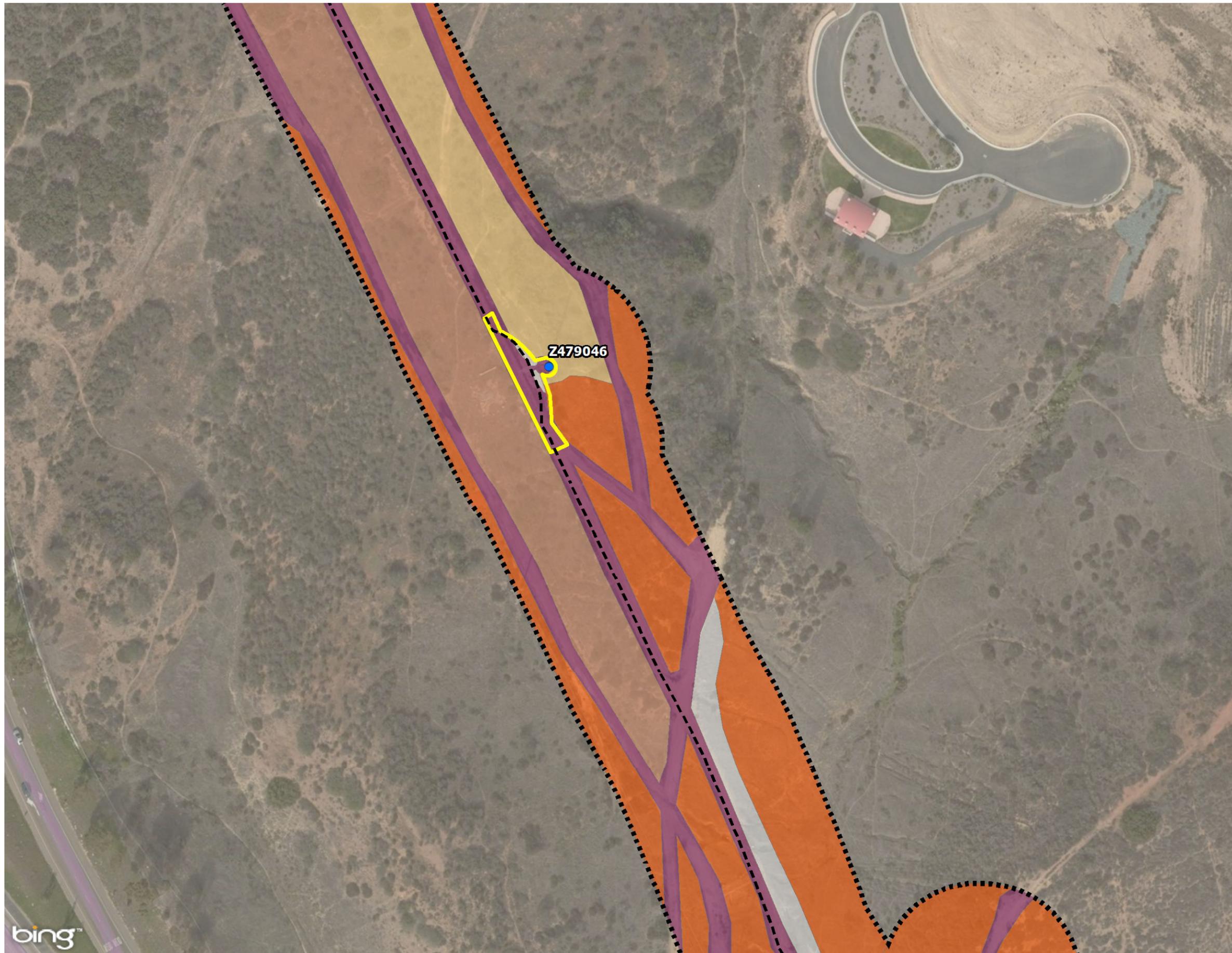


**Legend**

- MPR 8 Poles
  - Access Road
  - Temporary Work Area
  - Guard Structure
  - 100ft Buffer
- Vegetation Communities**
- Bare Ground
  - Chaparral
  - Coastal Sage Scrub
  - Coastal Sage/Chaparral Mix
  - Grassland
  - Pavement - Asphalt or Concrete



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 7**

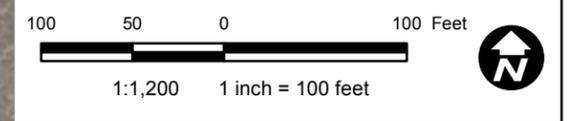
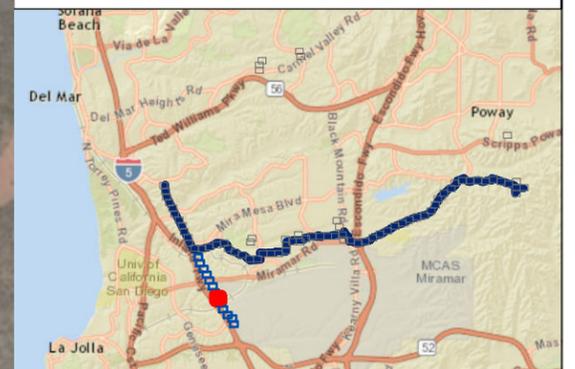


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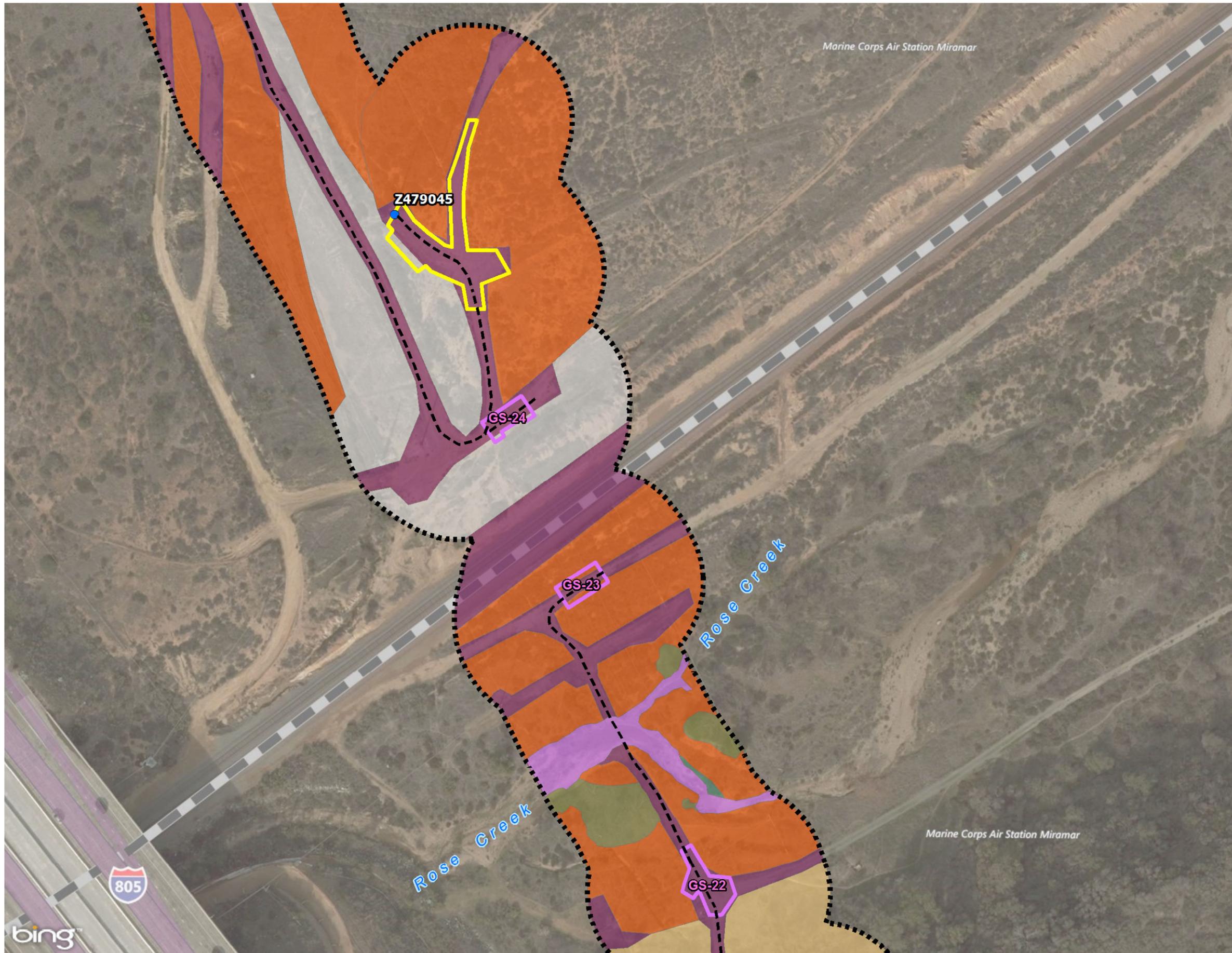
- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

**Vegetation Communities**

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



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

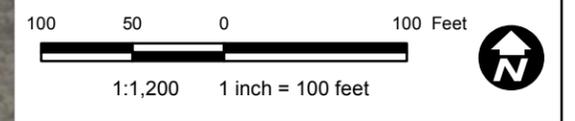
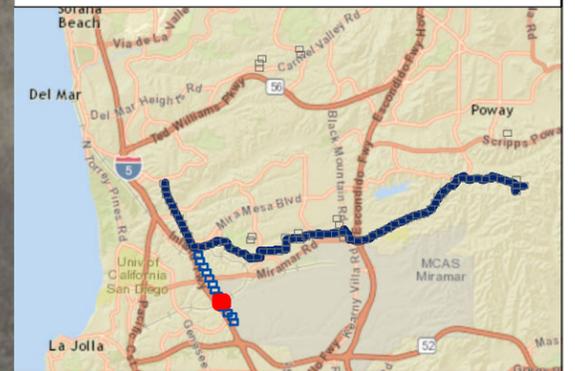


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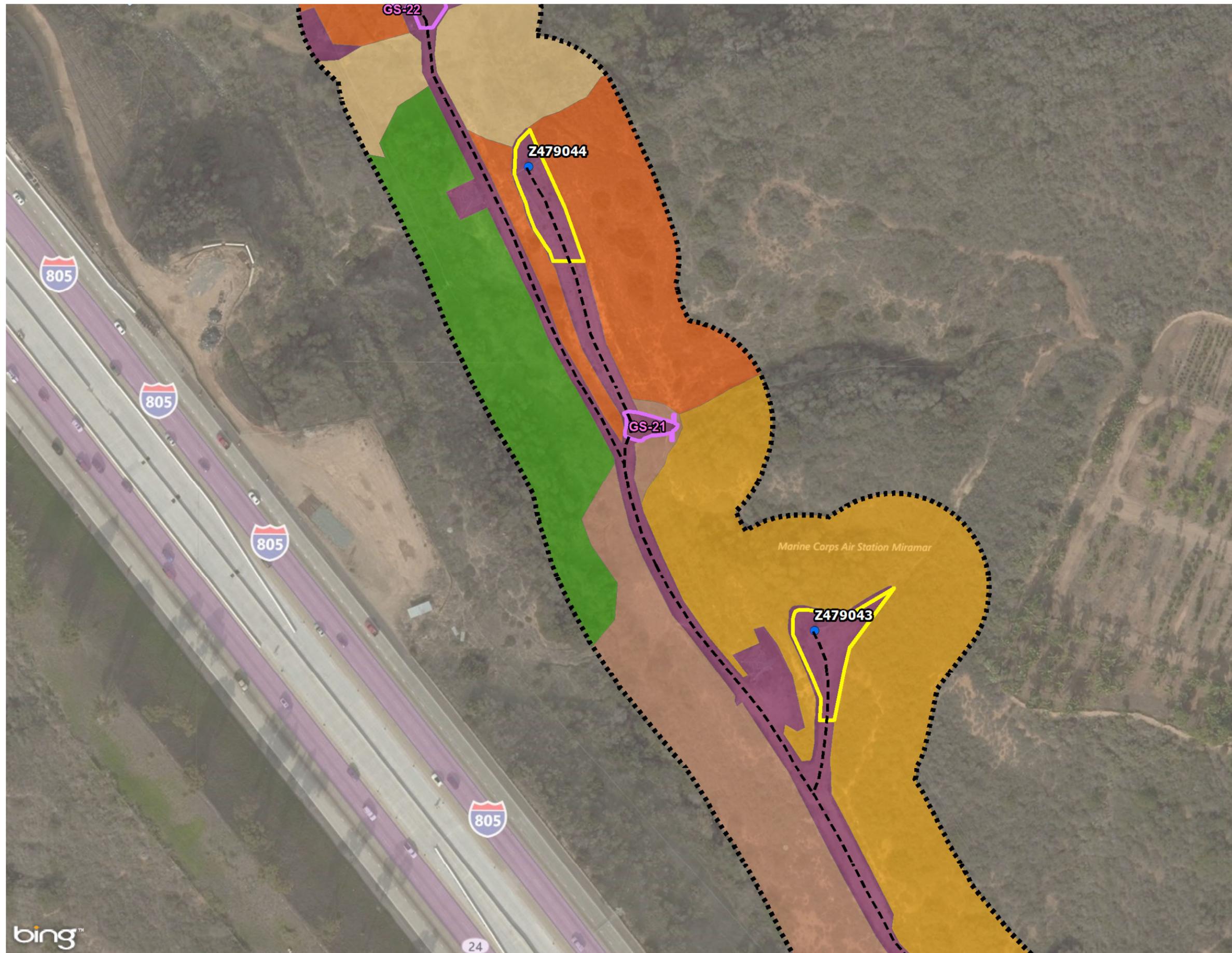
- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer

**Vegetation Communities**

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



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 9**

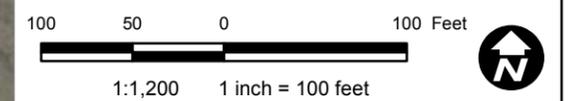
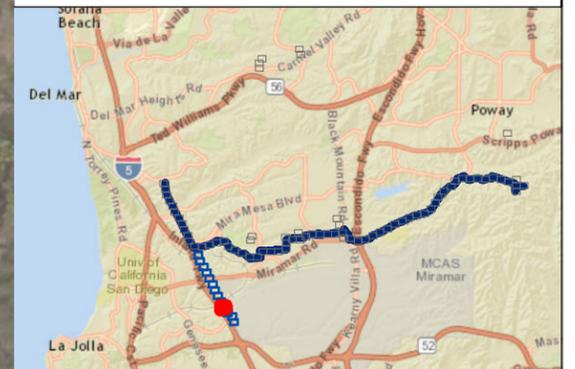


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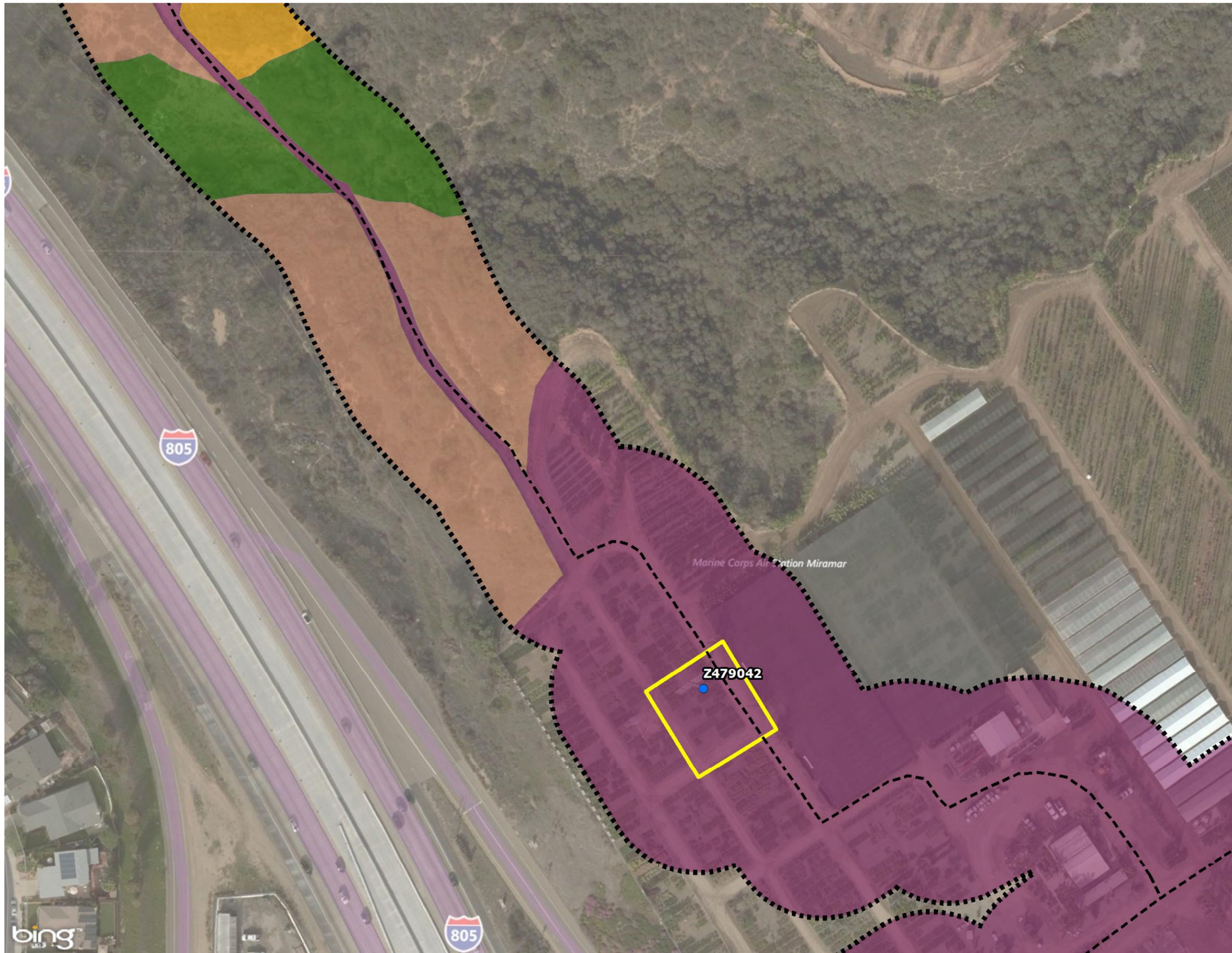
- MPR 8 Poles
- - - Access Road
- ▭ Temporary Work Area
- ▭ Guard Structure
- ▭ 100ft Buffer

**Vegetation Communities**

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



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 10**

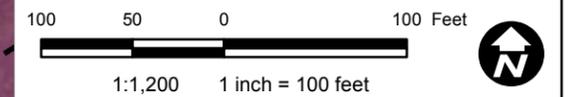
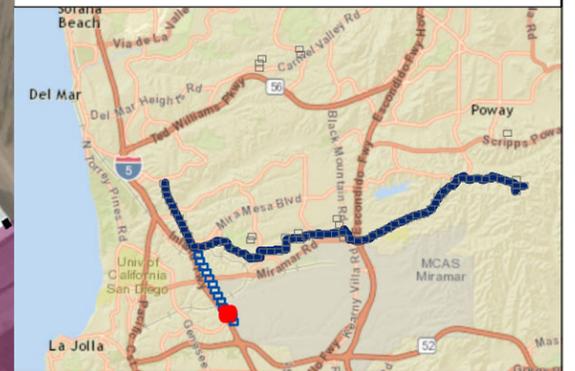


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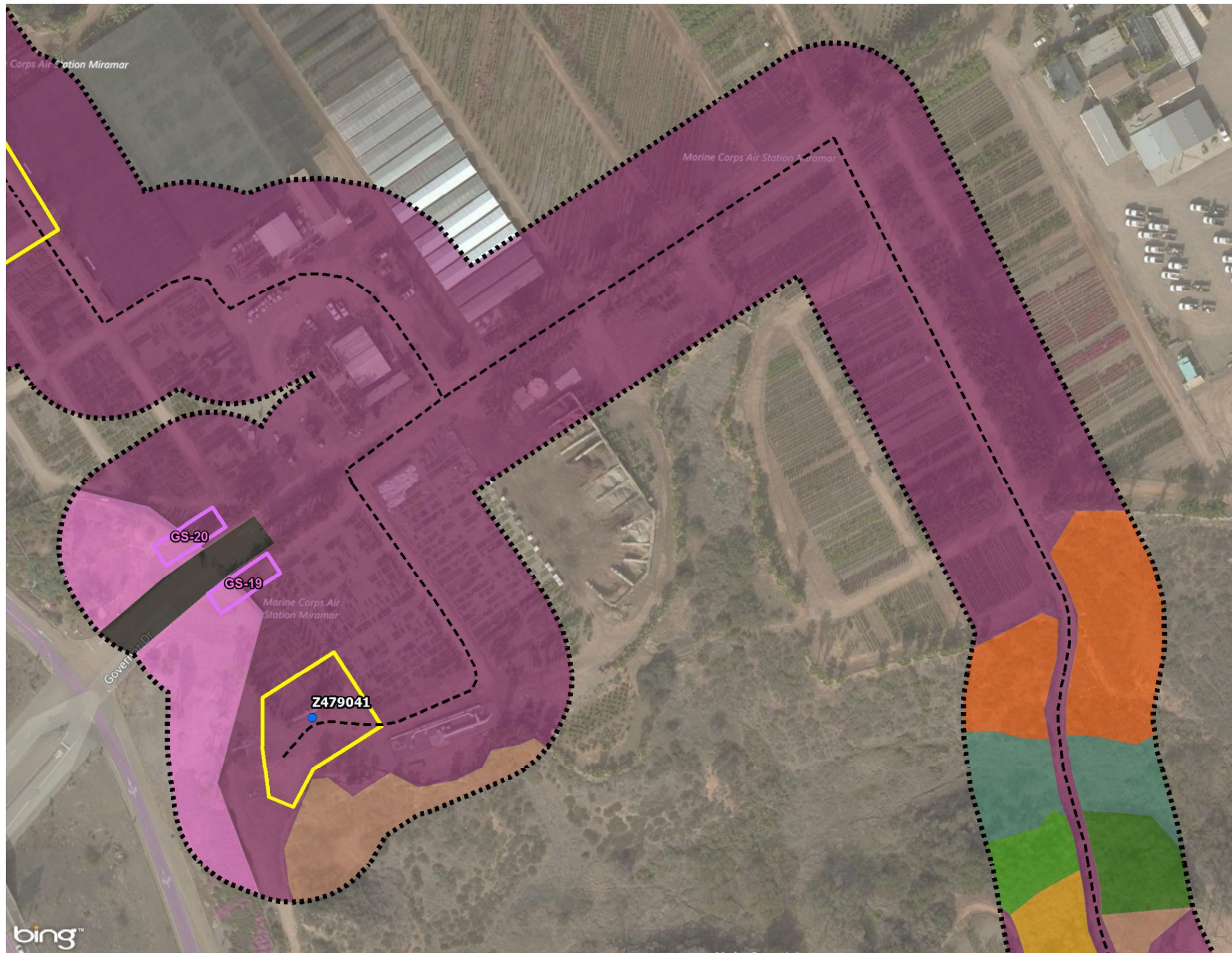
- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- ▣ 100ft Buffer

**Vegetation Communities**

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

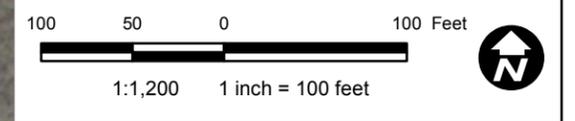
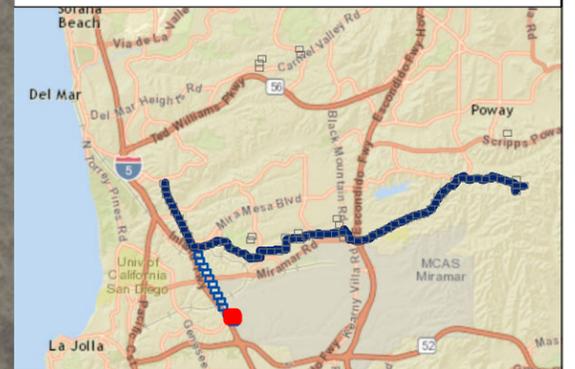


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 11**

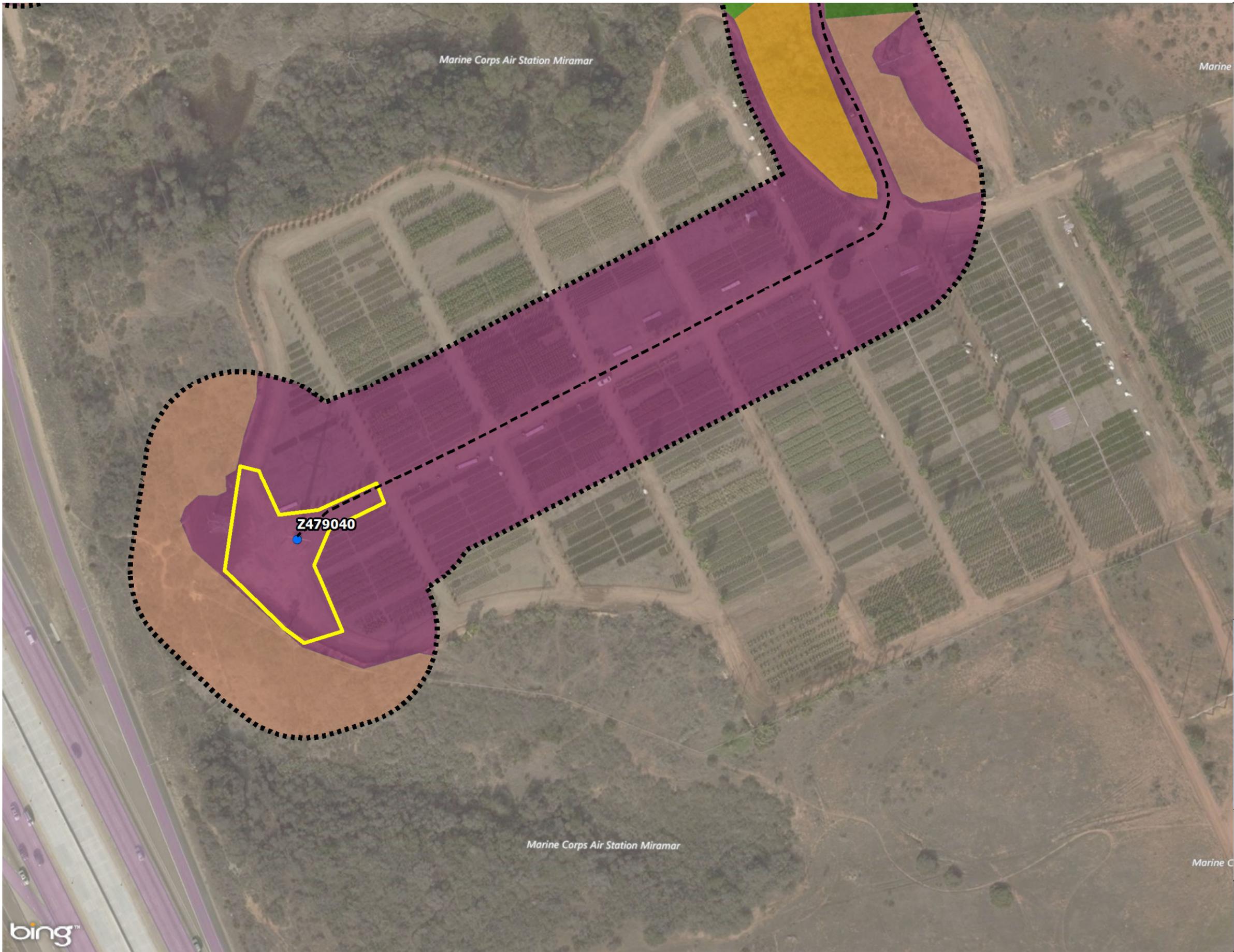


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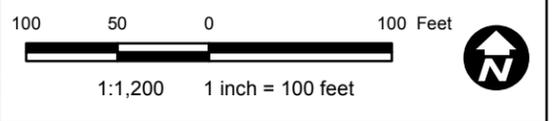
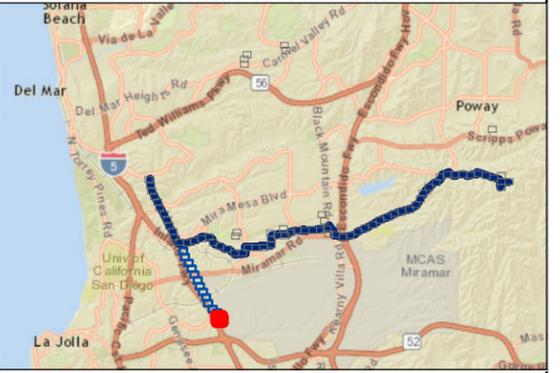
- MPR 8 Poles
  - Access Road
  - Temporary Work Area
  - Guard Structure
  - 100ft Buffer
- Vegetation Communities**
- Bare Ground
  - Coast Live Oak Forest
  - Coast Live Oak Riparian Forest
  - Coastal Sage Scrub
  - Coastal Sage/Chaparral Mix
  - Ornamental Landscaping
  - Pavement - Asphalt or Concrete
  - Riparian Scrub
  - Southern Maritime Chaparral



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 12**



- Legend**
- MPR 8 Poles
  - Access Road
  - Temporary Work Area
  - 100ft Buffer
- Vegetation Communities**
- Bare Ground
  - Coast Live Oak Forest
  - Coast Live Oak Riparian Forest
  - Coastal Sage/Chaparral Mix
  - Southern Maritime Chaparral



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vegetation Map 13**

## **APPENDIX B**

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### **Biological Resources**

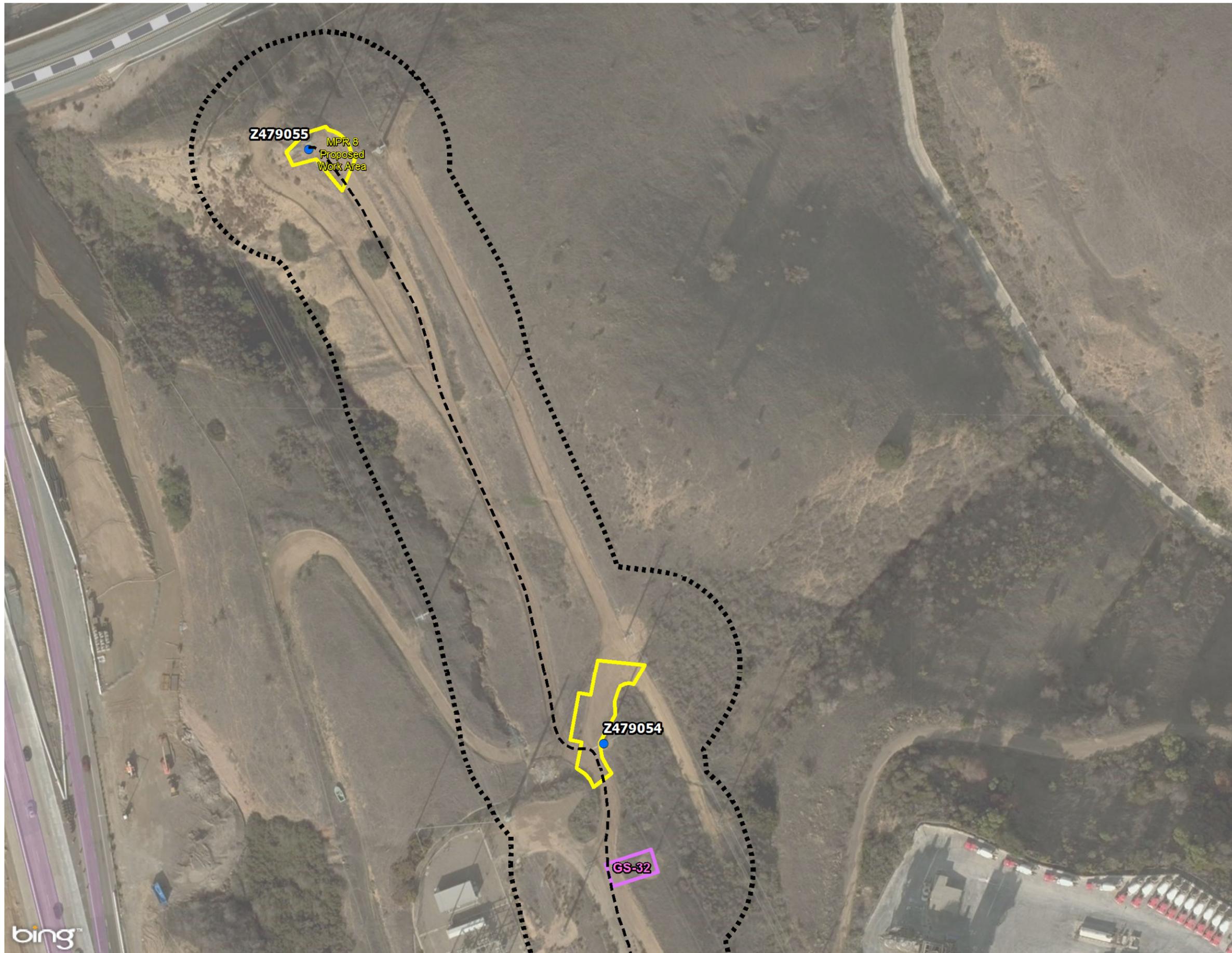
**Vegetation Maps**

**Vernal Pools and Wetlands Maps**

**Non-NCCP Special Status Plant Species Table**

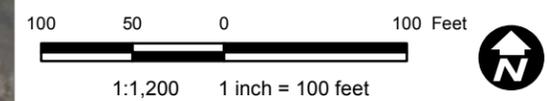
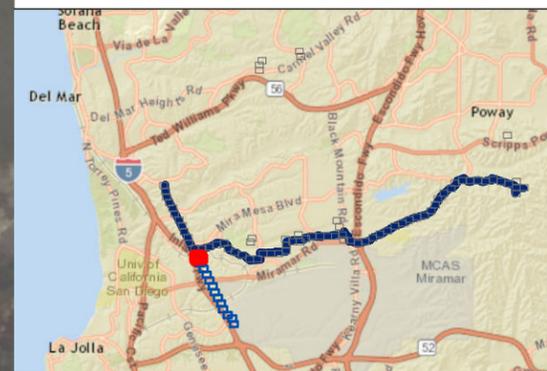
**Biological Pre-Activity Survey Report**

**Photographs**

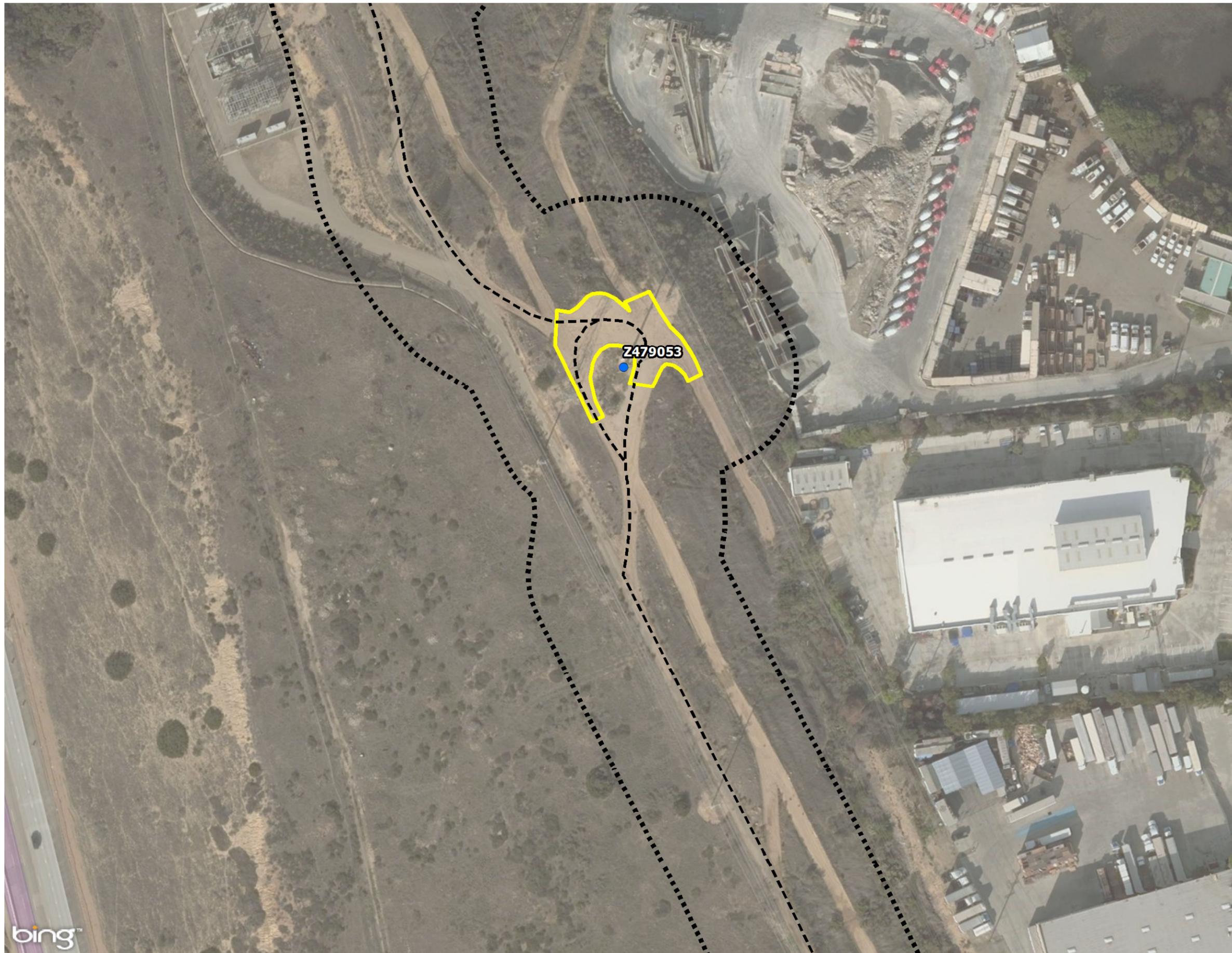


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- Guard Structure
- █ 100ft Buffer

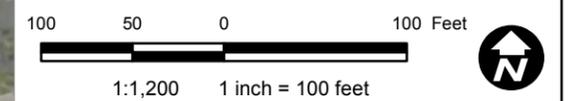
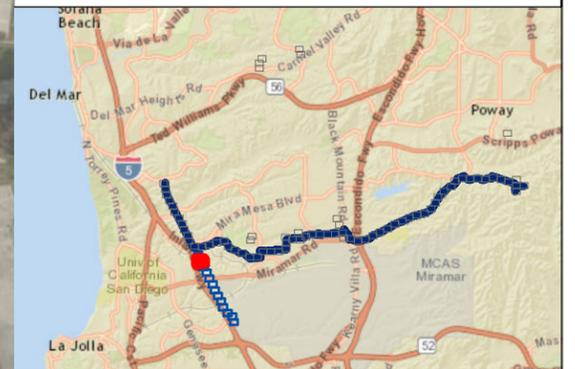


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 1**

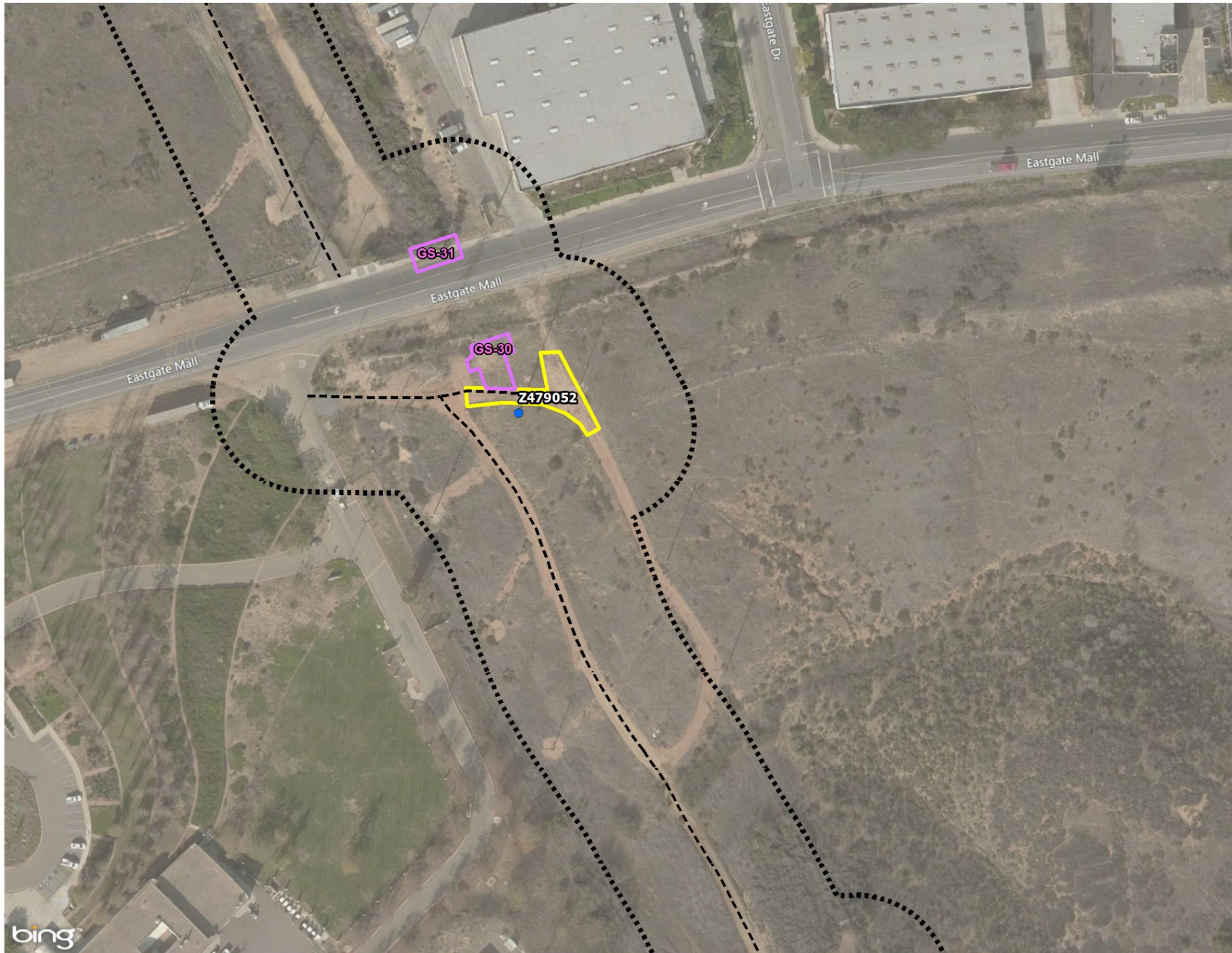


**Legend**

- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- 100ft Buffer

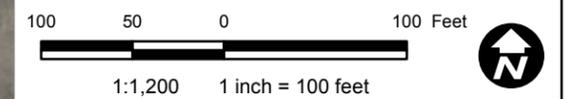
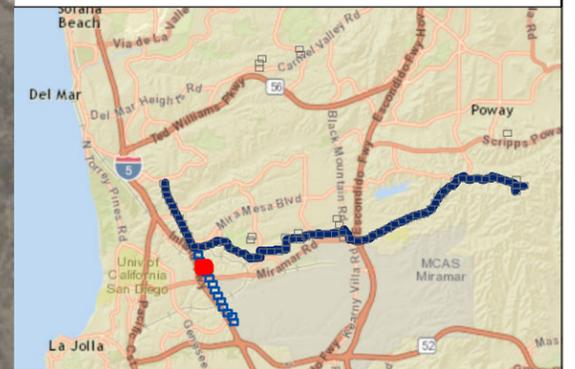


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 2**

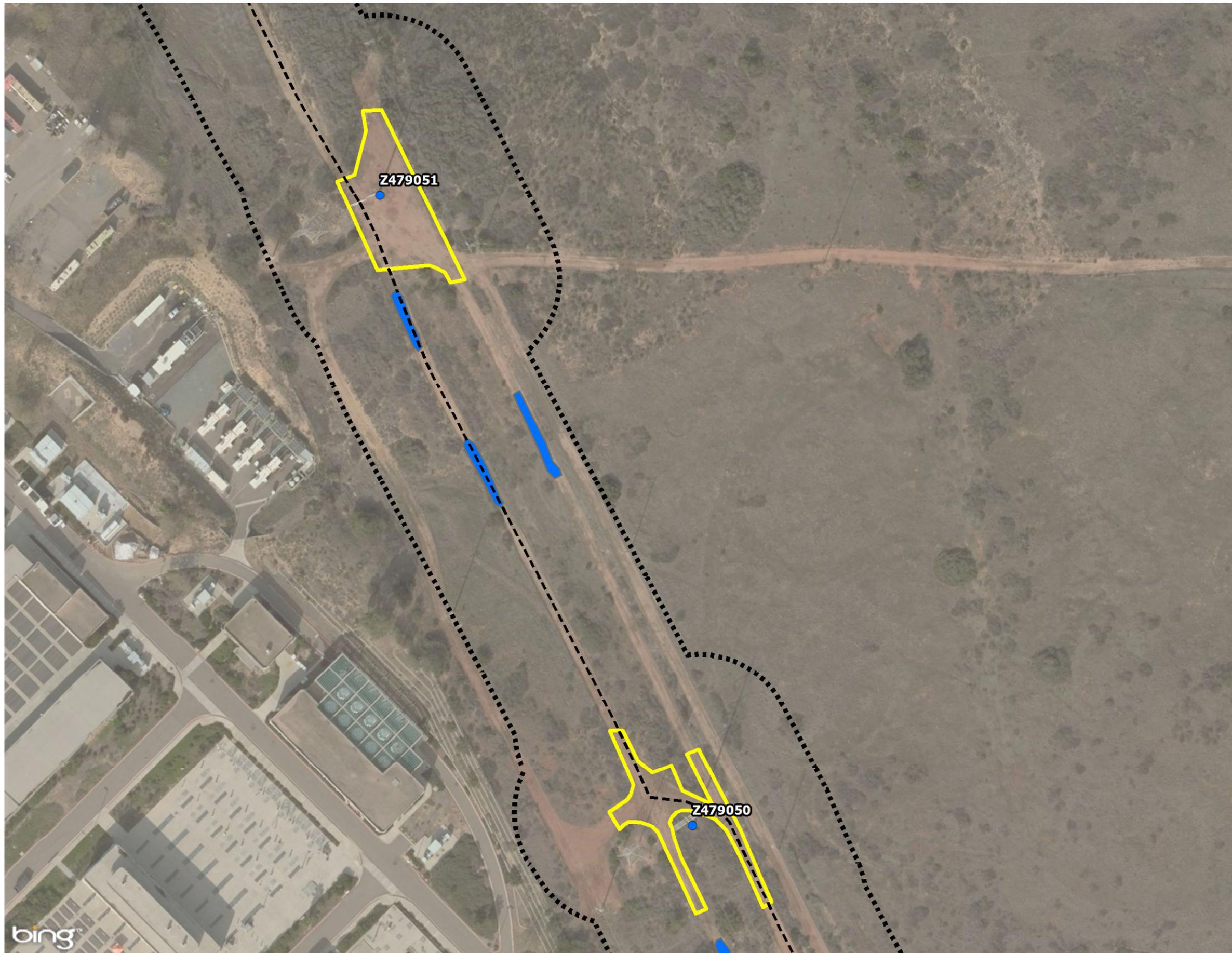


**Legend**

- MPR 8 Poles
- - - Access Road
- ▭ Temporary Work Area
- ▭ Guard Structure
- ▨ 100ft Buffer

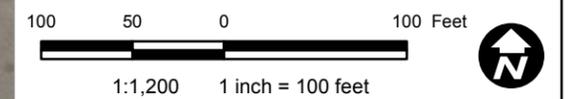
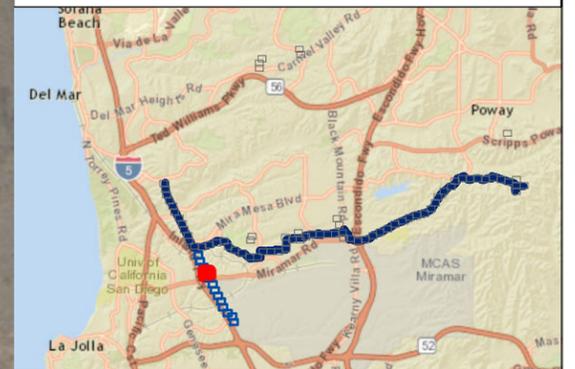


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 3**

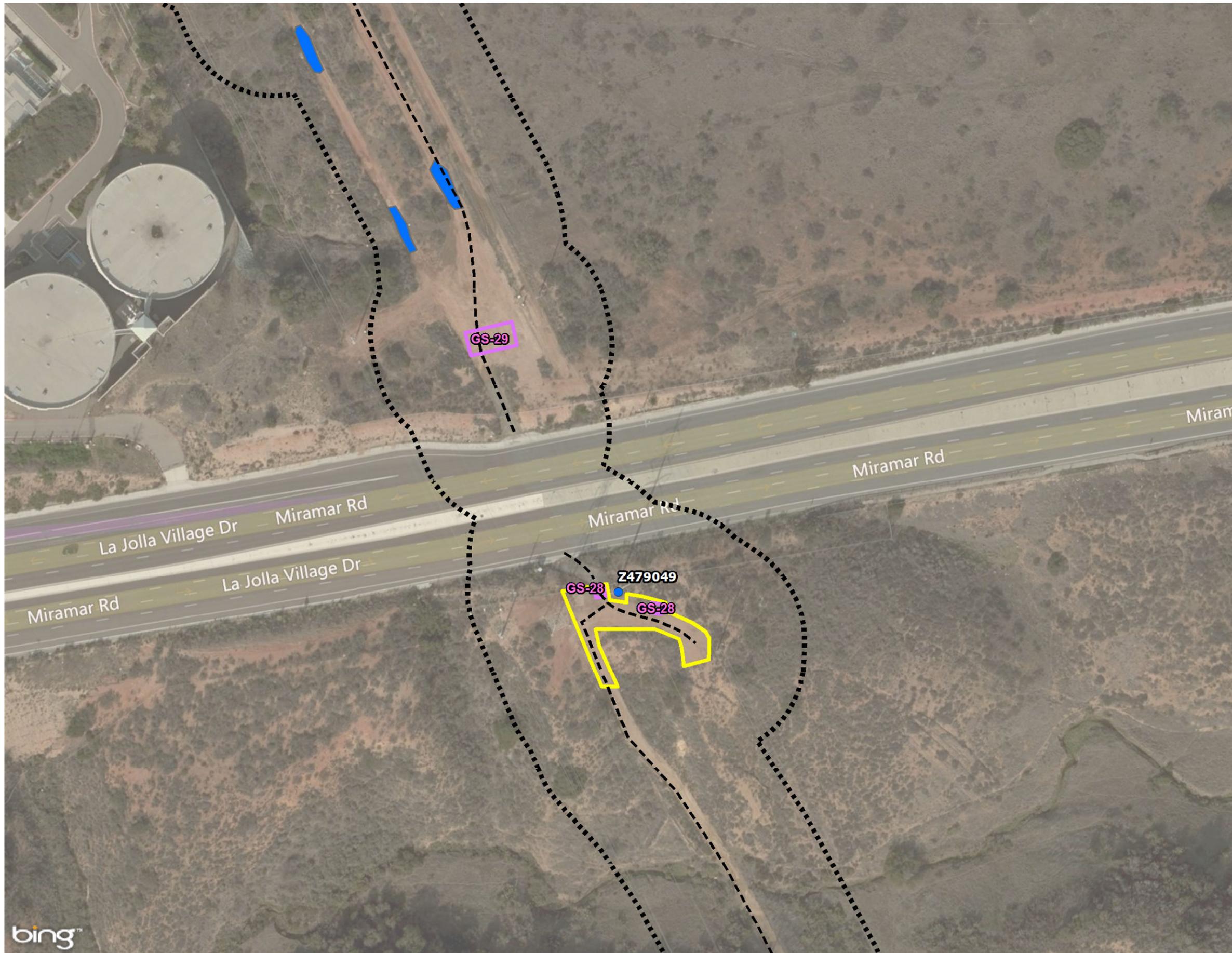


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- 100ft Buffer
- Disturbed Road Pools

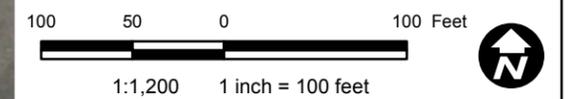
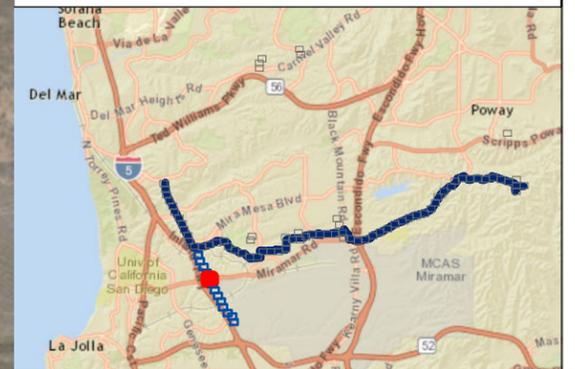


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 4**

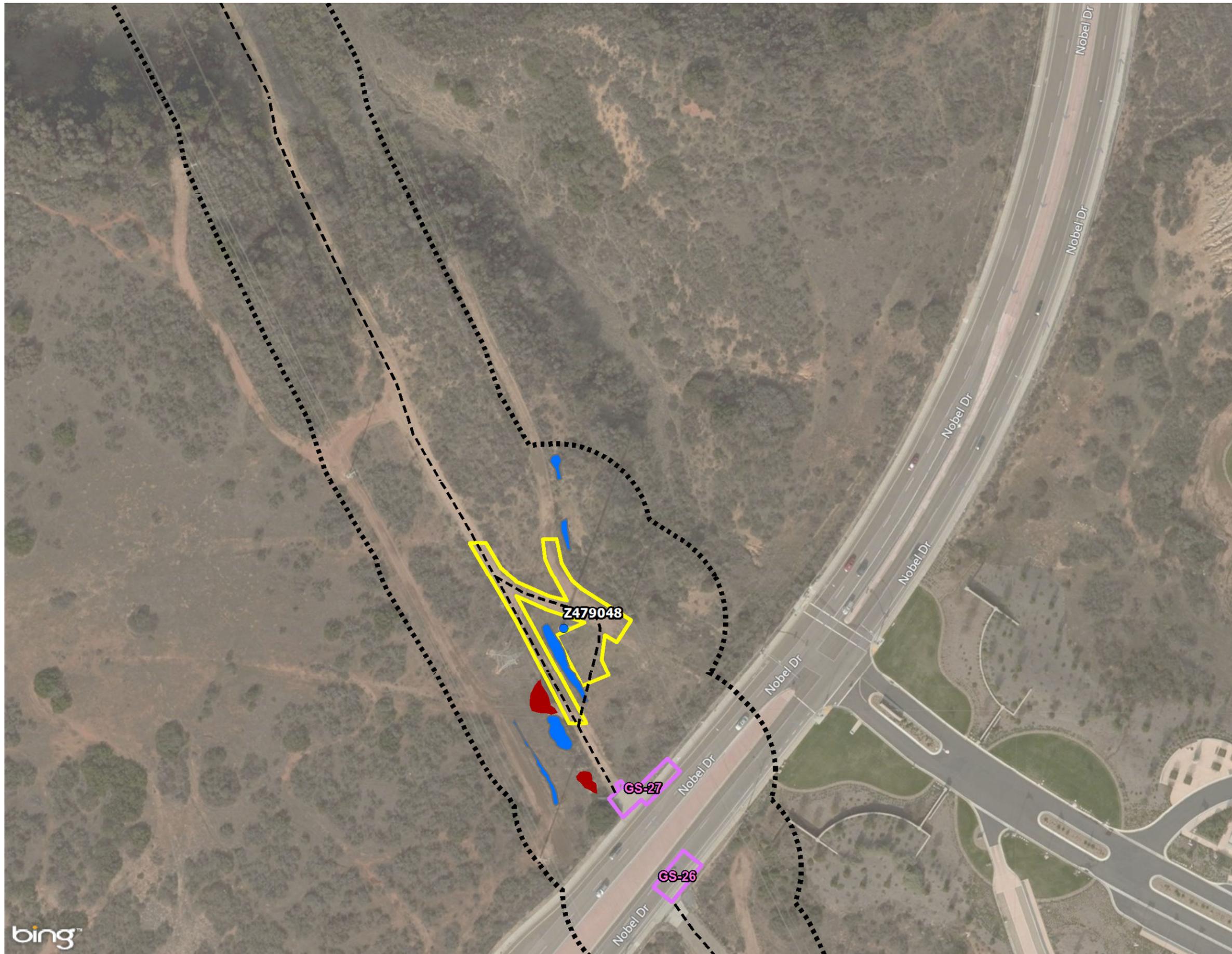


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Disturbed Road Pools

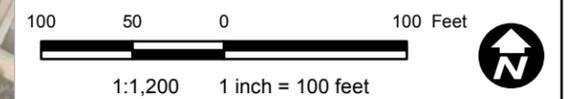
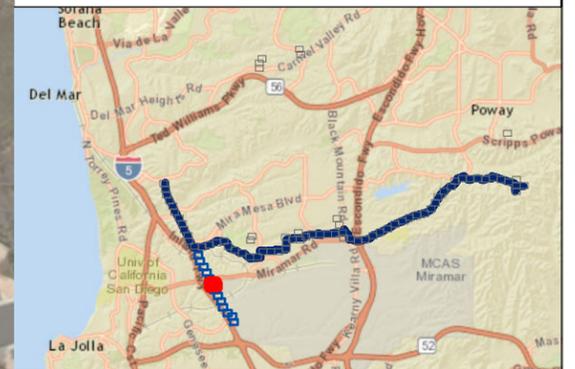


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 5**

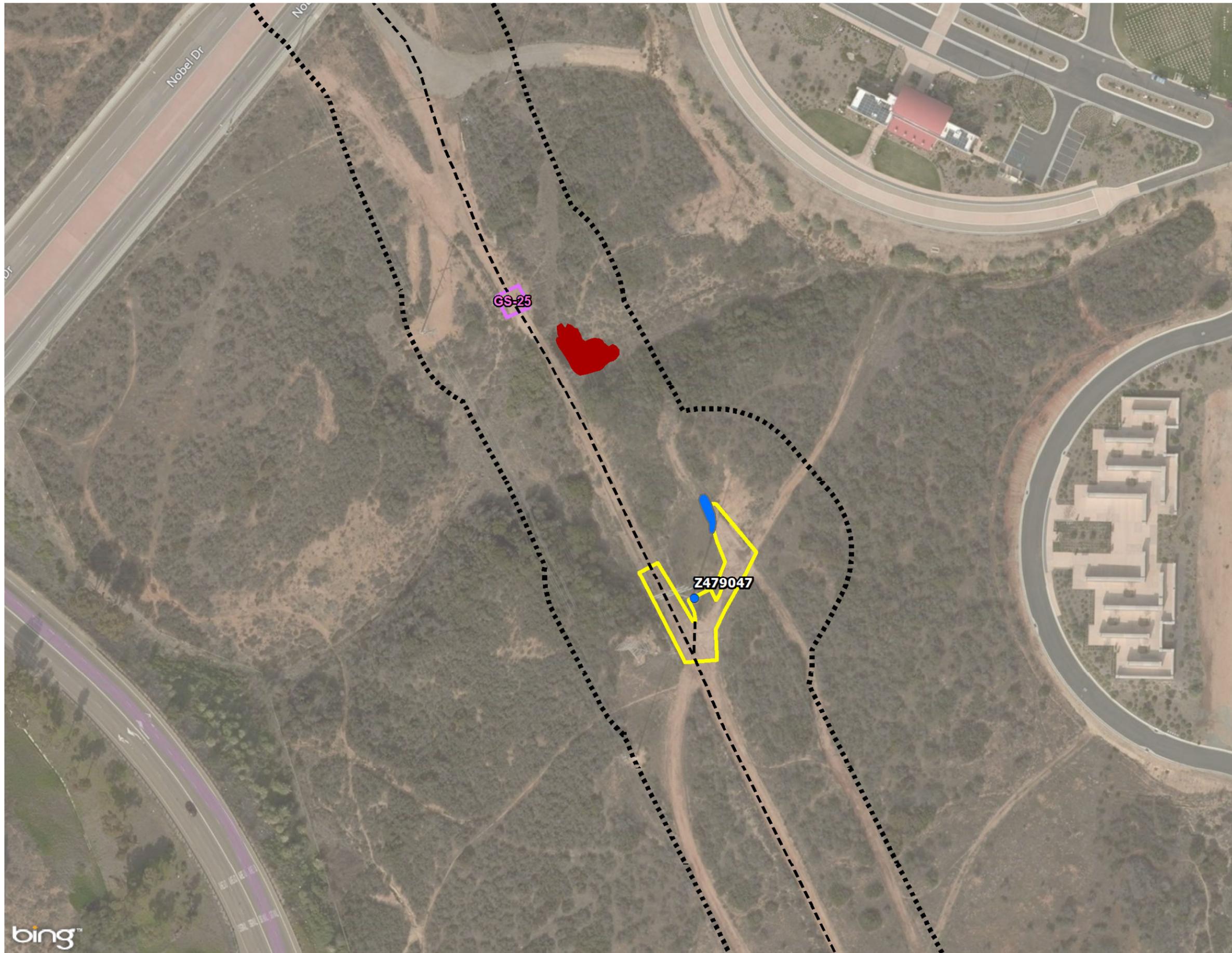


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Vernal Pools
- Disturbed Road Pools

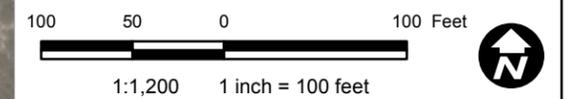
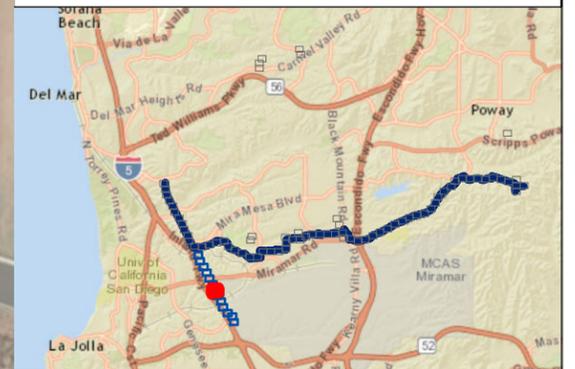


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 6**

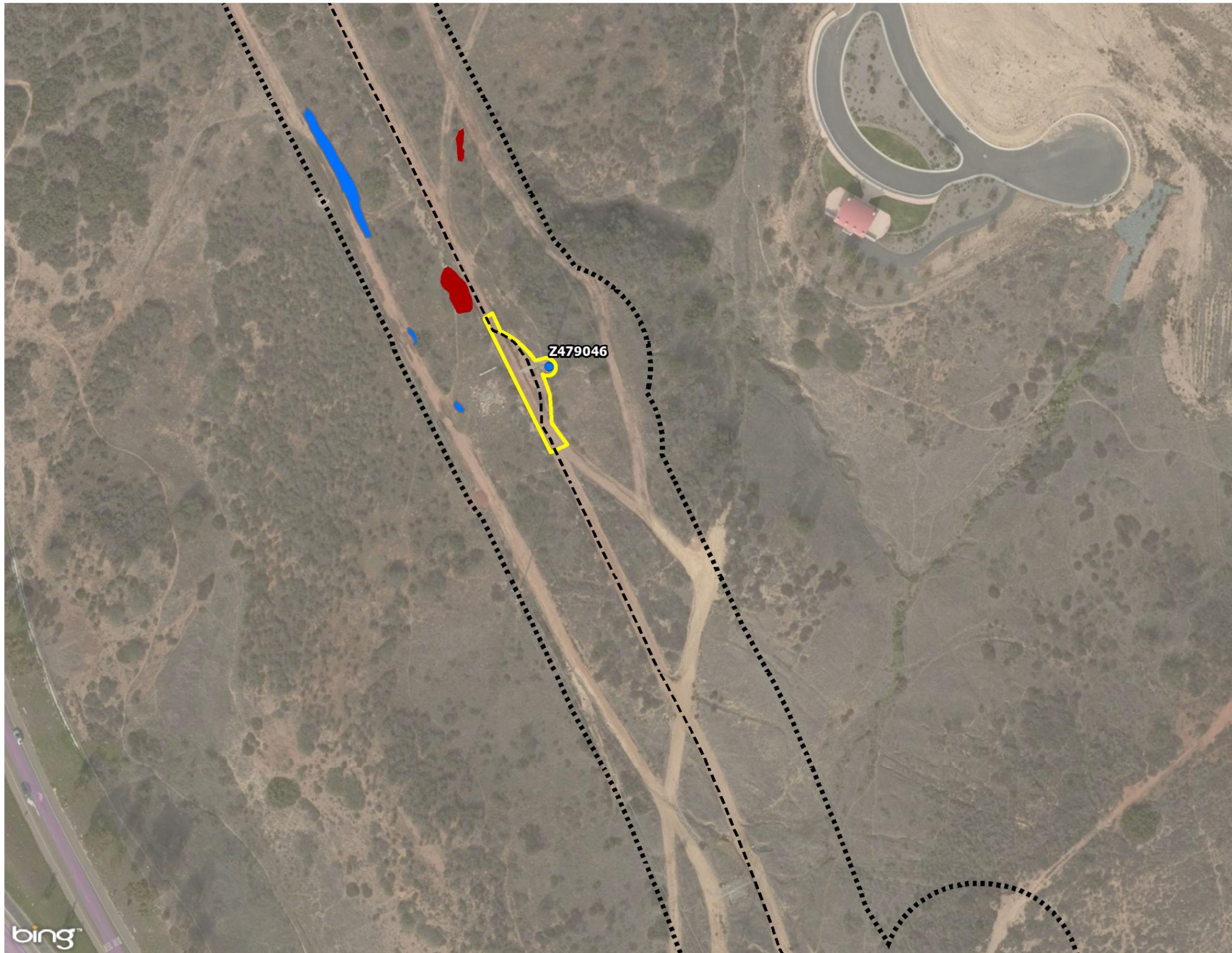


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- Guard Structure
- 100ft Buffer
- Vernal Pools
- Disturbed Road Pools

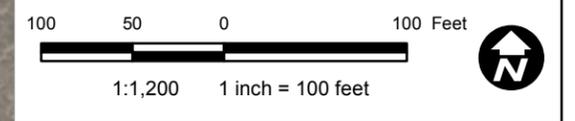
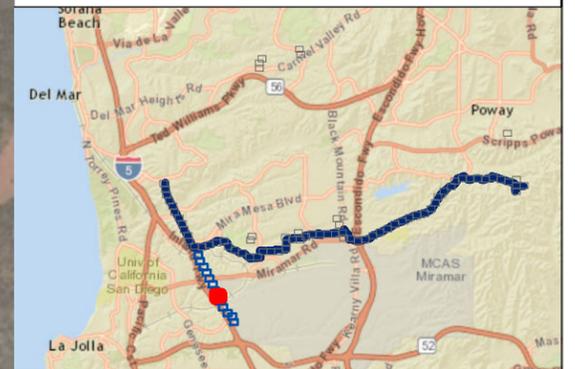


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 7**

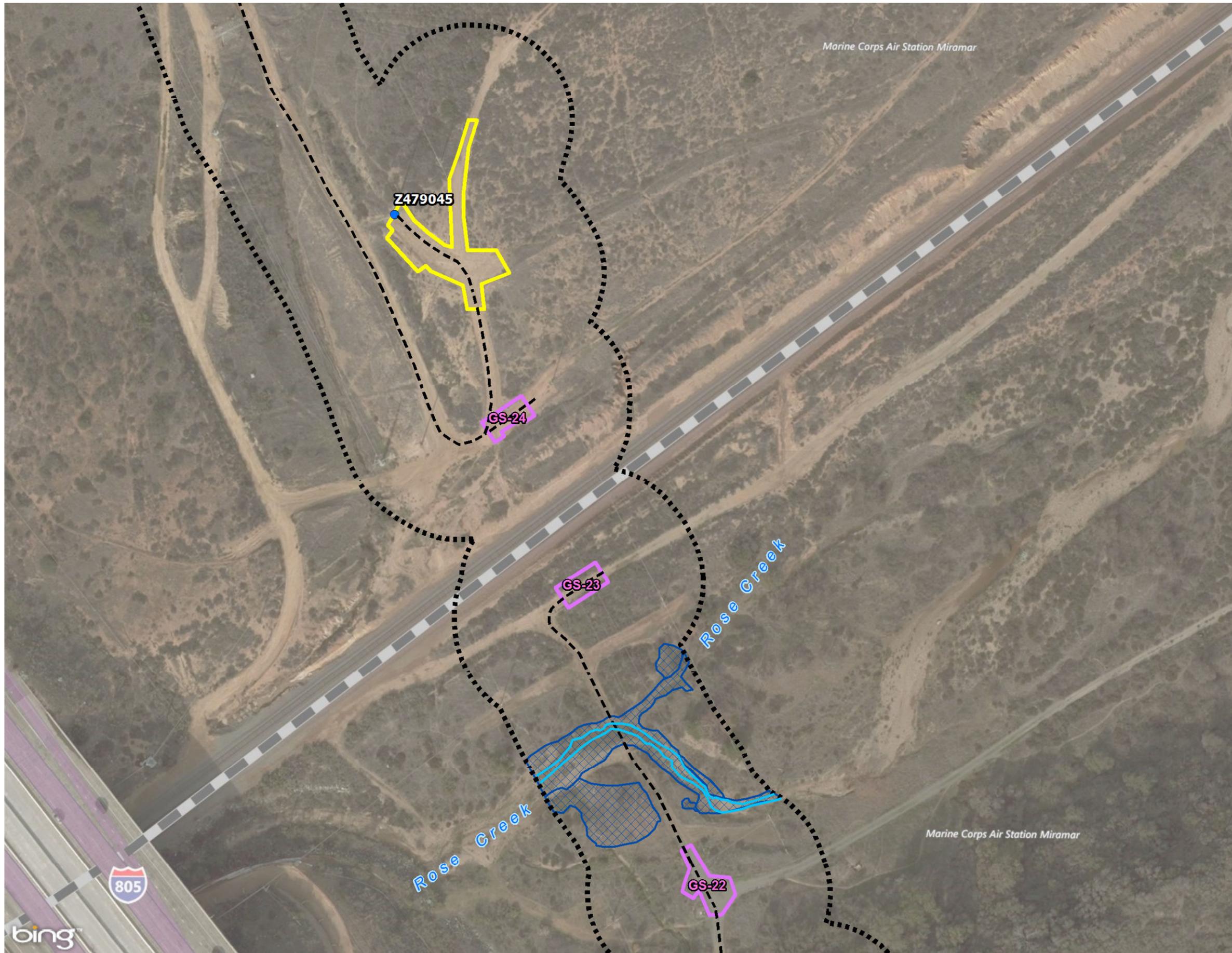


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- 100ft Buffer
- Vernal Pools
- Disturbed Road Pools

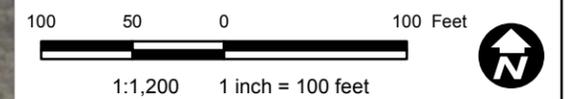
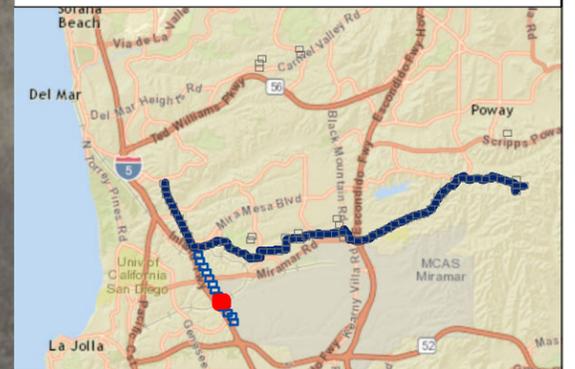


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 8**

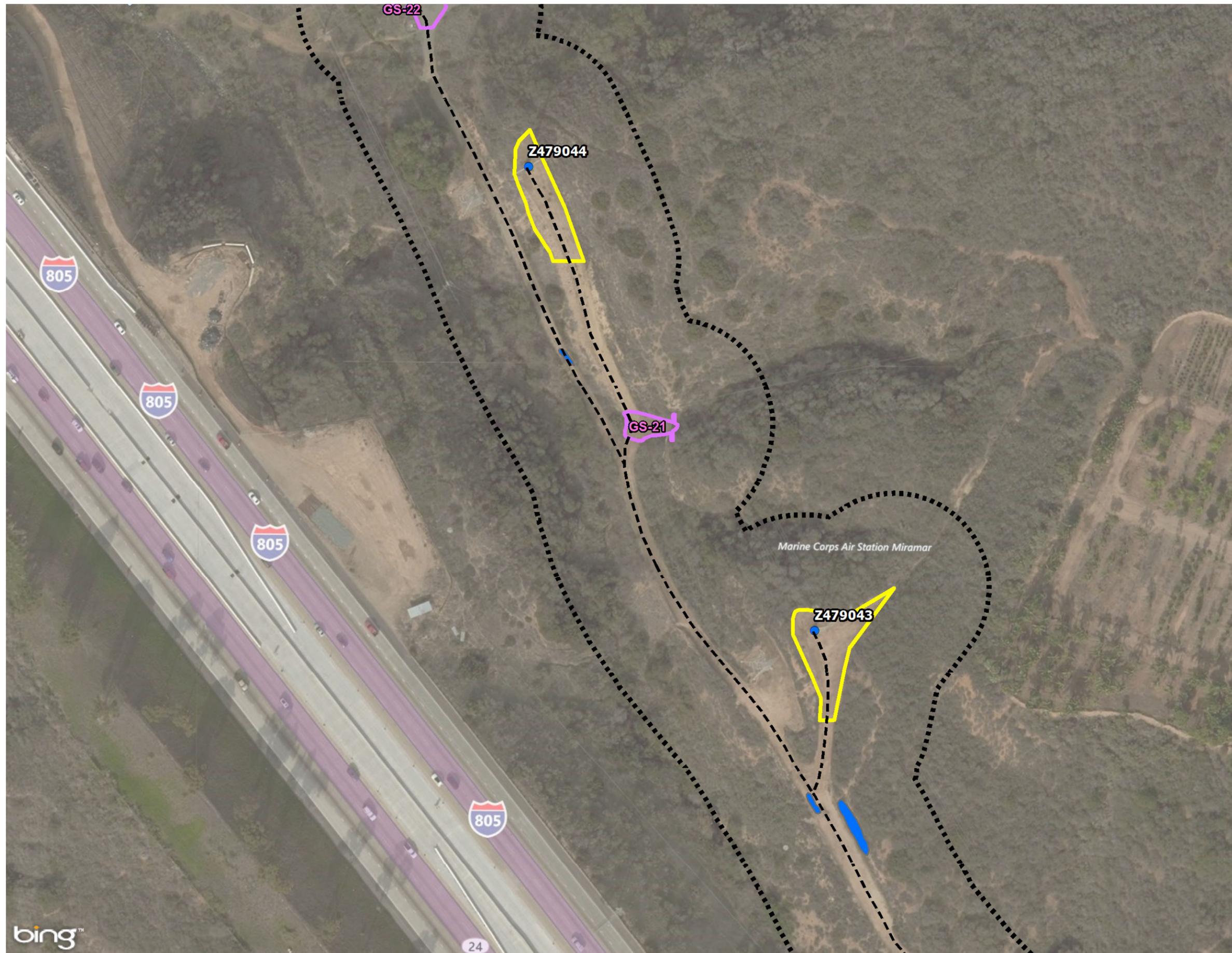


**Legend**

- MPR 8 Poles
- - - Access Road
- ▭ Temporary Work Area
- ▭ Guard Structure
- ▨ 100ft Buffer
- ▨ CDFW Jurisdiction
- Ordinary High Water Mark (OHWM)

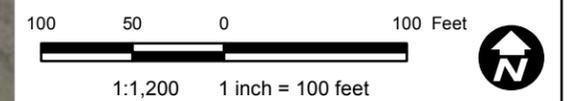
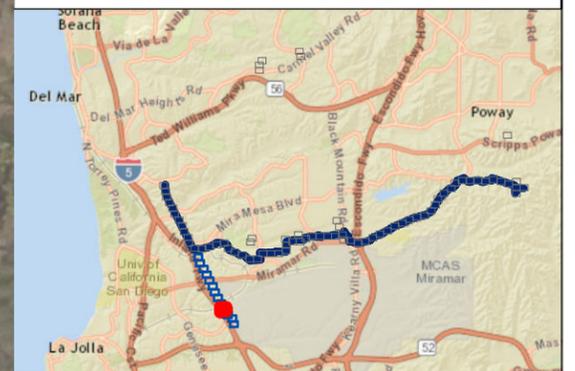


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 9**

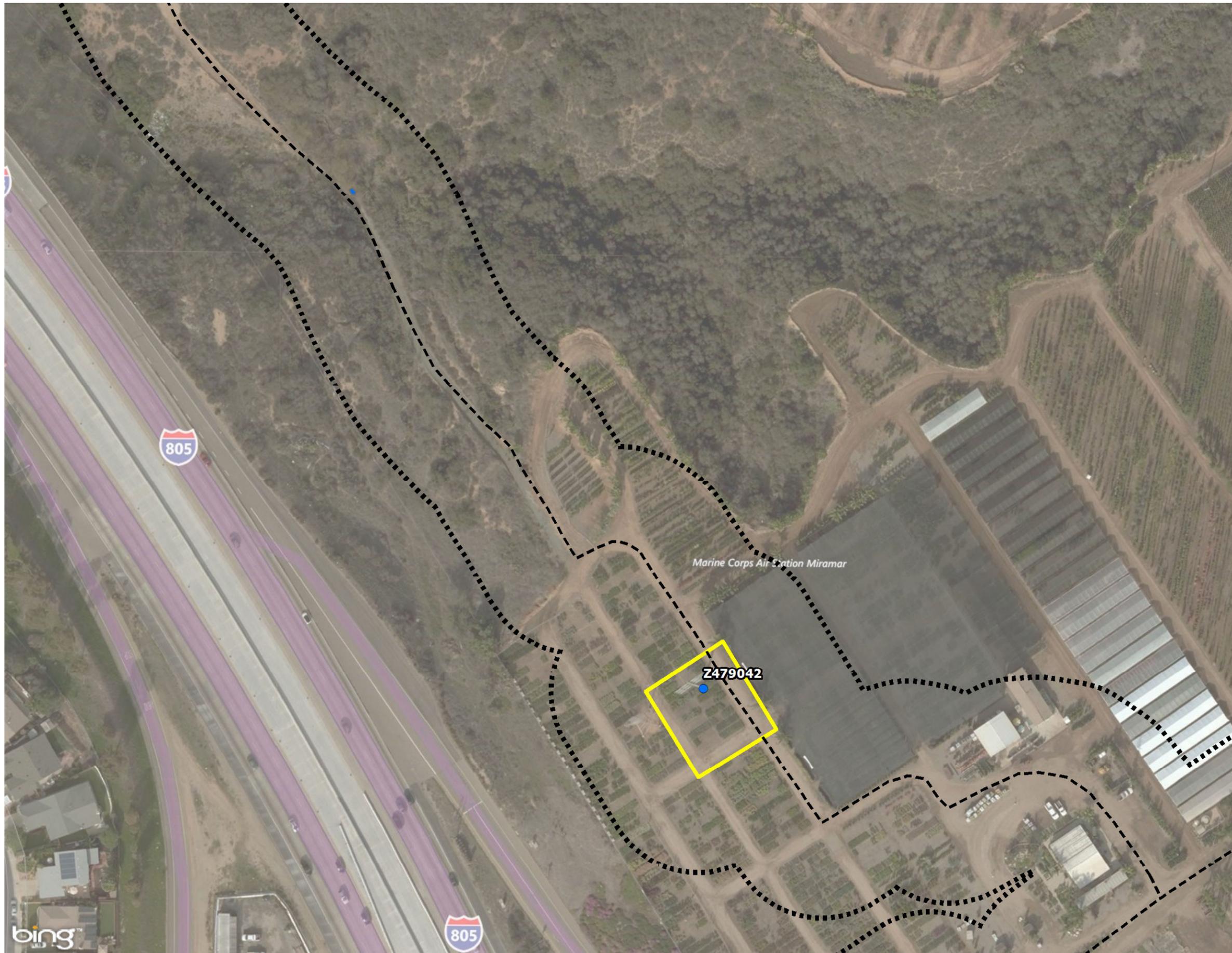


**Legend**

- MPR 8 Poles
- - - Access Road
- ▭ Temporary Work Area
- ▭ Guard Structure
- ▨ 100ft Buffer
- ▭ Disturbed Road Pools

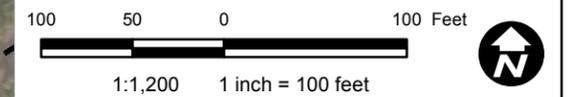
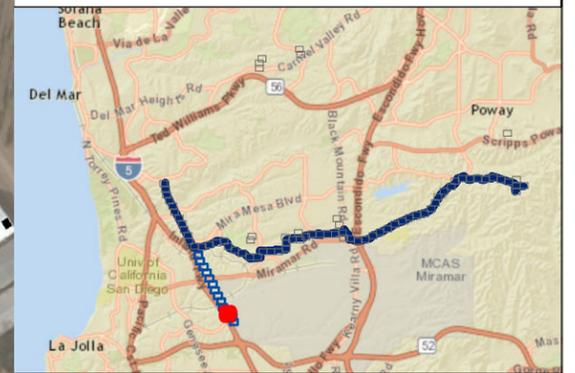


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 10**

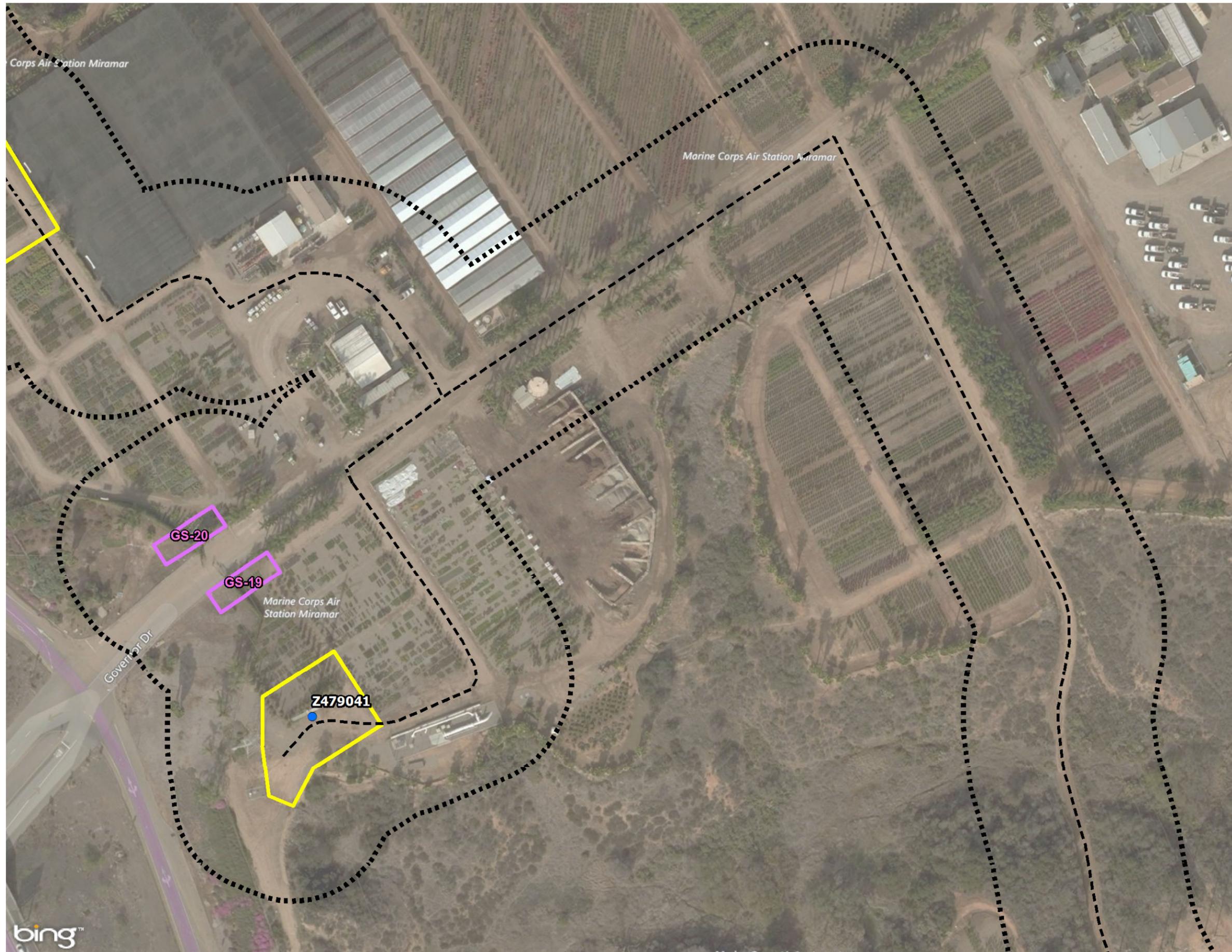


**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- 100ft Buffer
- Disturbed Road Pools

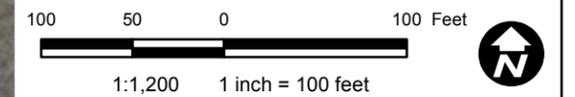
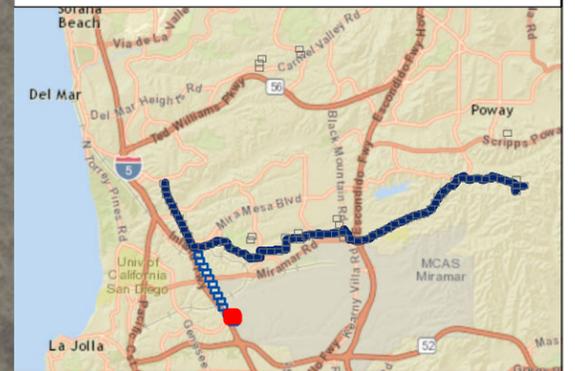


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 11**

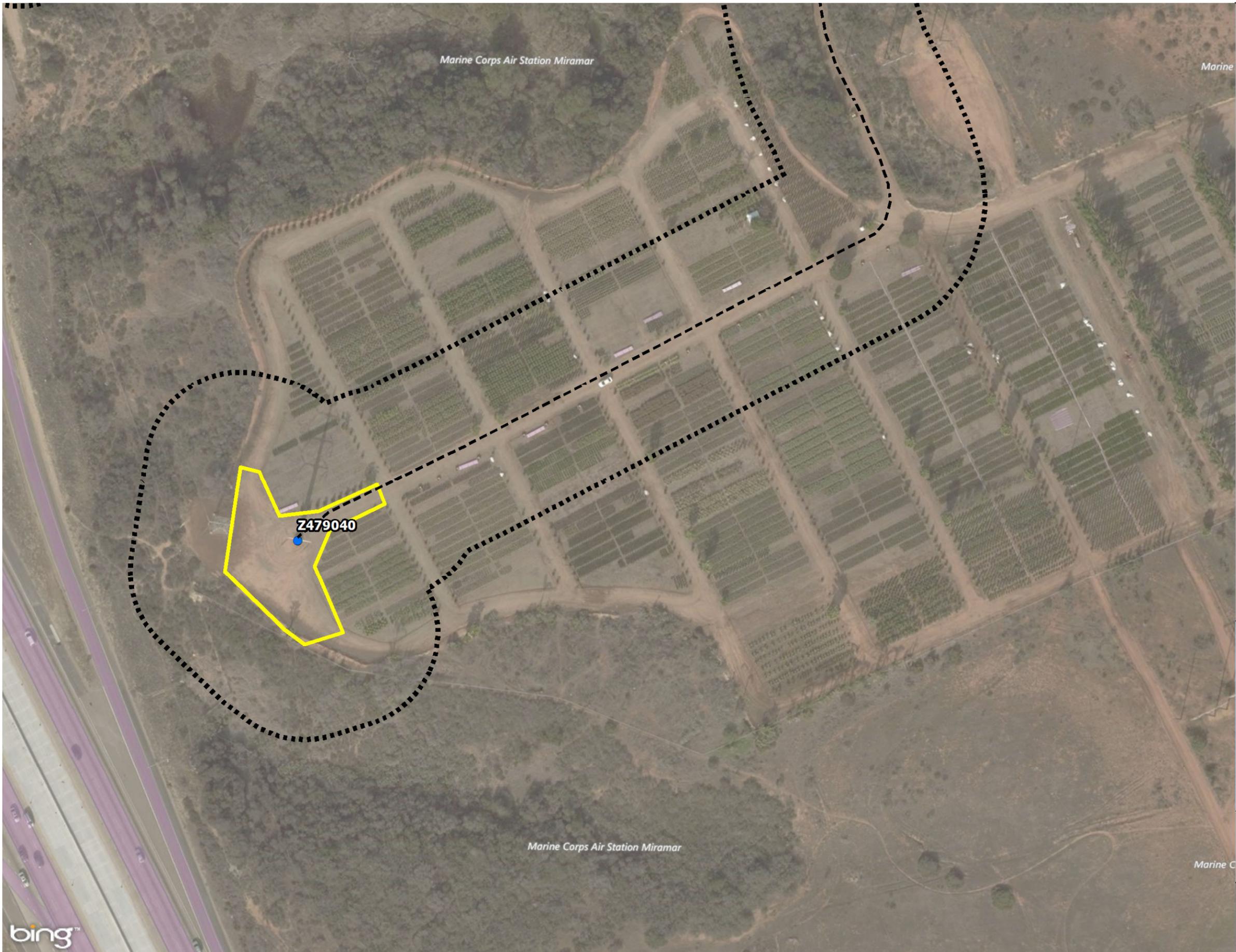


**Legend**

- MPR 8 Poles
- - - Access Road
- Temporary Work Area
- Guard Structure
- ⋯ 100ft Buffer

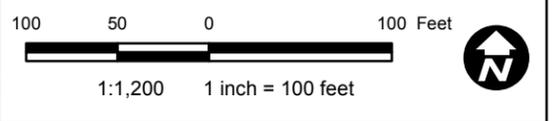
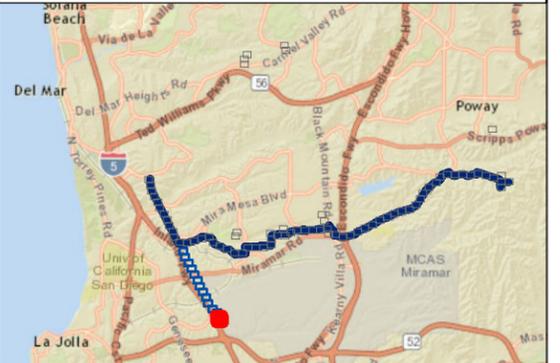


**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 12**



**Legend**

- MPR 8 Poles
- Access Road
- Temporary Work Area
- 100ft Buffer



**Sycamore to Peñasquitos  
230kV Transmission Line Project  
Proposed Refinement Area - MPR 8  
Vernal Pools and Wetlands Map 13**

## **APPENDIX B**

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### **Biological Resources**

Vegetation Maps

Vernal Pools and Wetlands Maps

**Non-NCCP Special Status Plant Species Table**

Biological Pre-Activity Survey Report

Photographs

Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts

According to the California Natural Diversity Database, the following non-NCCP covered species have been recorded within 1 mile of the Project. Of these species, all were evaluated in the FEIR, with the exception of Cambell's liverwort, salt spring checkerbloom, bottle liverwort, and coastal whiptail. The first three of these species are not anticipated to occur within MPR #8 work areas. While coastal whiptail has the potential to occur and was not previously identified individually by species in the FEIR, the FEIR assessment of impacts to special-status reptile species can be considered inclusive of this species, and mitigation per the FEIR would offset any potential impact.

Plant Species			
Species	Status <sup>1</sup>	Primary Habitat Association	Potential to Occur/Comments
California adolphia ( <i>Adolphia californica</i> )	CRPR 2B.1	Dry slopes, chaparral, coastal sage scrub, grassland	This species is not expected to occur in the work areas, as it was not observed during the survey, and would have been observed if present.
San Diego sagewort ( <i>Artemisia palmeri</i> )	CRPR 4.2	Drainages in chaparral, coastal sage scrub, riparian, mesic and sandy soils	Observed immediately west of the access road between poles P479043 and P479044, and one individual was observed on the east perimeter of GS-22. Additionally, the species was observed adjacent to Rose Creek, but outside of any of the work areas. The areas where this species is present will not be accessed for Project activities and species will be flagged for avoidance. As a result, no impacts to this species are anticipated.
Summer holly ( <i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i> )	CRPR 1B.2	Chaparral, cismontane woodland	This species is not expected to occur in the work areas, as it was not observed during the survey, and would have been observed if present.
Campbell's liverwort ( <i>Geothallus tuberosus</i> )	CRPR 1B.1	Shady areas in moist coastal sage scrub habitat and vernal pools	Not expected to grow within any of the coastal sage scrub within the work areas at poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these areas is relatively open and dry. While potentially suitable habitat occurs in the understory of dense shaded poison oak ( <i>Toxicodendron diversilobum</i> ) within a total of 16 square feet of the work area of GS-21, this species is not expected to occur as it is only known from a locality in the Project vicinity, and is not known to occur within the Project area. Therefore, no impacts to this species are anticipated as a result of Project-related activities.

Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts

Plant Species			
Species	Status <sup>1</sup>	Primary Habitat Association	Potential to Occur/Comments
Graceful tarplant ( <i>Holocarpha virgata</i> ssp. <i>elongata</i> )	CRPR 4.2	Clay soils in chaparral, cismontane woodland, coastal sage scrub, grassland, and disturbed areas	Observed during the survey, although not documented by the CNDDDB within one mile of the project. This species was locally abundant within the surrounding areas of the Project, and individuals were observed within the work areas at poles Z479046 and Z479047, as well as within portions of the access roads throughout the project, some of which are regularly maintained, and some of which are avoided by maintenance activities due to the presence of road ruts which could support vernal pool species. As stated in the FEIR, because of the lower sensitivity of this species, and low number of individuals impacted by the proposed Project, impacts would be less than significant. No mitigation is required.
Coulter's goldfields ( <i>Lasthenia glabrata</i> ssp. <i>coulteri</i> )	CRPR 1B.1	Coastal salt marsh, playas, vernal pools	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area will not be accessed for Project activities. This species was not detected during the field survey, and no impacts are anticipated.
Robinson's peppergrass ( <i>Lepidium virginicum</i> var. <i>robinsonii</i> )	CRPR 4.3	Chaparral, coastal sage scrub	Potentially suitable for this species occurs within portions of the work areas at poles Z479049, Z479050, GS-21, GS-23, and GS-25. It was not detected due to the time of year of survey. As stated in the FEIR, because of the lower sensitivity of this species, and small areas within which individuals could potentially be impacted by the proposed Project, impacts would be less than significant. Impacts from the proposed Project would not significantly impact the populations of these species. No mitigation is required.
Nuttall's scrub oak ( <i>Quercus dumosa</i> )	CRPR 1B.1	Sandy or clay soils in chaparral, coastal sage scrub, and closed-cone coniferous forests	Observed during the survey along a portion of the access road to pole Z479040, immediately adjacent to GS-21, and approximately 30 feet north of pole P479046, along the access road and east perimeter of the work area. Individuals will be flagged for avoidance, prior to construction. Therefore, impacts to this species are not anticipated.
Salt spring checkerbloom ( <i>Sidalcea neomexicana</i> )	CRPR 2B.2	Wetland habitats within chaparral, coastal sage scrub, yellow pine forests, and riparian areas	Habitat suitable for this species does not occur within any of the project sites or access roads.

Sycamore to Peñasquitos 230 kV Minor Project Refinement 8 (MPR No. 8) – Non-NCCP Special Status Plant Species Accounts

Plant Species			
Species	Status <sup>1</sup>	Primary Habitat Association	Potential to Occur/Comments
Bottle liverwort ( <i>Sphaerocarpos drewei</i> )	CRPR 1B.1	Coastal sage scrub	Not expected to grow within any of the coastal sage scrub within the work areas at poles Z479049, Z479050, GS-23, or GS-25, as the coastal sage scrub within these areas is relatively open and dry. While potentially suitable habitat occurs in the understory of dense shaded poison oak ( <i>Toxicodendron diversilobum</i> ) within a total of 16 square feet of the work area of GS-21, this species is not expected to occur as it is only known from a locality in the Project vicinity, and is not known to occur within the Project area.

Wildlife Species			
Species	Status <sup>1</sup>	Primary Habitat Association	Potential to Occur/Comments
Coastal whiptail ( <i>Aspidoscelis tigris stejnegeri</i> )	SSC	Occurs in coastal southern California from sea level to 7,000 above mean sea level. It prefers dry open areas in chaparral or coastal sage scrub with relatively sparse foliage	Habitat potentially suitable for this species occurs throughout the project area, including sites containing coastal sage scrub and access roads adjacent to coastal sage scrub and chaparral habitats. With implementation of the mitigation measures outlined in the FEIR, no significant impacts to this species are anticipated.

<sup>1</sup>Status:

CRPR = California Rare Plant Rank

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

## **APPENDIX B**

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### **Biological Resources**

Vegetation Maps

Vernal Pools and Wetlands Maps

Non-NCCP Special Status Plant Species Table

**Biological Pre-Activity Survey Report**

Photographs

**SDG&E NCCP Pre-activity Survey Report Text Form**

<b>eTS Number</b>	25459	<b>Task Tracker Number</b>	
<b>Project Name</b>	Sycamore-Peñasquitos 230-kV Transmission Line Project		
<b>DPSS</b>			

**Proposed Work Description**

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

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

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

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

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

**Table 1. Project Sites**

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

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

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

- 1) Bucket truck staged under transmission line

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

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

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

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

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

**SDG&E NCCP Pre-activity Survey Report Text Form**

4) Protective material installed on distribution lines

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

Information on guard structures is detailed below in Table 2.

**Table 2. Guard Structures**

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

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

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

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

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

**Habitat Evaluation**

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

Site-001 Pole Z479040

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

### **Site-002 Pole Z479041**

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

### **Site-003 Pole Z479042**

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

### **Site-004 Pole Z479043**

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

### **Site-005 Pole Z479044**

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

### **Site-006 Pole Z479045**

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

### **Site-007 Pole Z479046**

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

## **SDG&E NCCP Pre-activity Survey Report Text Form**

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

### Site-008 Pole Z479047

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

### Site-009 Pole Z479048

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

### Site-010 Pole Z479049

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

### Site-011 Pole Z479050

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

### Site-012 Pole Z479051

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

### Site-013 Pole Z479052

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

### Site-014 Pole Z479053

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

### Site-015 Pole Z479054

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

### Site-016 Pole Z479055

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

### Site-017 GS-19

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

### Site-018 GS-20

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

### Site-019 GS-21

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

### Site-020 GS-22

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

### Site-021 GS-23

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

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### Site-022 GS-24

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

### Site-023 GS-25

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

### Site-024 GS-26

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

### Site-025 GS-27

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

### Site-026 GS-28

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

### Site-027 GS-29

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

### Site-028 GS-30

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

### Site-029 GS-31

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

### Site-030 GS-32

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

General Wildlife

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

NCCP-Covered Species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Reviewer Recommendations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Table 4: Required Habitat Mitigation Ratios**

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

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

**Notes**

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

The Restoration Plan shall include the following performance criteria:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- A biologist knowledgeable of vireo and/or flycatcher biology and ecology, approved by the CPUC, USFWS, and CDFW, will survey within the project impact footprint and a 300-foot buffer (within riparian scrub) before clearing vegetation or project construction to check for vireo and/or flycatcher nesting activity. Should an active nest be located in the impact footprint, then work will be suspended until the nest is vacated.
- Biological buffers of at least 100 feet will be maintained adjacent to active nests.

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

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

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

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

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

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

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

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

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

### **Summary of Impacts**

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

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

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

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

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

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

### Mitigation

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

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

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

## **APPENDIX B**

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### **Biological Resources**

**Vegetation Maps**

**Vernal Pools and Wetlands Maps**

**Non-NCCP Special Status Plant Species Table**

**Biological Pre-Activity Survey Report**

**Photographs**

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**Photo 1.** North-facing view of Z479040.



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

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**Photo 3.** North-facing view of Z479041.



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

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**Photo 5.** West-facing view of Z479042.



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

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**Photo 7.** Northeast-facing view of Z479043.



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

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**Photo 9.** North-facing view of Z479044.



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

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**Photo 11.** Northwest-facing view of Z479045.



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

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



**Photo 14.** East-facing view of Z479046.

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



**Photo 16.** Southwest-facing view of Z479047.

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



**Photo 18.** Southwest-facing view of Z479048.

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



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

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**Photo 21.** North-facing view of Z479049.



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

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



**Photo 24.** Southwest-facing view of Z479050.

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



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

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**Photo 27.** West-facing view of Z479051.



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

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**Photo 29.** Northwest-facing view of Z479052.



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

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**Photo 31.** West-facing view of Z479053.



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

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**Photo 33.** Northeast-facing view of Z479054.



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

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



**Photo 36.** Northwest-facing view of Z479055.

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



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

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



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

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



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

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



**Photo 44.** Aerial view of GS-22.

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



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

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



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

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



**Photo 50.** Aerial view of GS-25.

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



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

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



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

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



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

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Photo 57. Aerial-view of GS-30.



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

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



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