



Cleveland National Forest Power Line Replacement Projects

To: Lisa Orsaba, California Public Utilities Commission (CPUC); Allison Rice, Dudek
From: Kirstie Reynolds, San Diego Gas & Electric Company (SDG&E)
Date: May 7, 2020 (Revised May 29, 2020)
Re: Cleveland National Forest Power Line Replacement Projects, Phase II of Circuit 440
Minor Project Refinement Memo

Regulatory Background

The Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Cleveland National Forest Power Line Replacement Projects describes SDG&E's Proposed Project for Circuit (C) 440 as "approximately 24 miles in length and runs from the Glencliff Substation north and northeast within the vicinity of the Sunrise Highway, with short branches heading both east and west past Mount Laguna where it terminates near Monument Peak Road." The Proposed Project includes approximately 8.4 miles of underground 12 kilovolt (kV) circuit at various locations (from Interstate 8 [I-8] along Sunrise Highway to just west of Morris Ranch Road and within the Laguna Campground area). As described in the Proposed Project, the remainder of C440 north of Morris Ranch Road would remain overhead and be reconstructed with wood-to-steel pole replacements.

The Federal Preferred Alternative described in the Final EIR/EIS included the C440 Mount Laguna Underground Alternative. This alternative includes the undergrounding described in the Proposed Project, as well as an additional approximately 14.3 miles of undergrounding of existing 12 kV line and the removal of 348 poles in total. The CPUC authorized the Federal Preferred Alternative and issued a Permit to Construct (Decision 16-05-038) on May 26, 2016. The United States Forest Service (USFS) Final Record of Decision (ROD), which was issued on March 11, 2016, authorized the Federal Preferred Alternative and directed "the relocation of all sections of C440 (those proposed by SDG&E and those included in the Federal Preferred Alternative) to locations within existing roads, when possible."

Notably, because the undergrounding portions of the Proposed Project had already undergone significant engineering by SDG&E, while engineering for the additional undergrounding authorized by the CPUC and the USFS required additional time to complete, C440 was broken into three phases (Phase I Undergrounding, Phase I Overhead, and Phase II). Phase I Underground, as described in Notice to Proceed (NTP) request #10, consisted of approximately 10.3 miles of undergrounding as described in the Proposed Project and authorized in the Federal

Preferred Alternative. NTP request #10 included undergrounding along Sunrise Highway from I-8 to Morris Ranch Road and was approved by the CPUC and USFS on December 18, 2017.

Phase I Overhead, as described in NTP request #23, consisted of approximately 0.5 mile of undergrounding that was authorized in the Federal Preferred Alternative. NTP request #23 included the removal of the existing overhead alignment that was rebuilt as underground within Sunrise Highway, a small portion of new undergrounding along Sheephead Mountain Road, and rebuilding of portions of the overhead alignment near I-8 and Sheephead Mountain Road. NTP request #23 was approved by the USFS on June 28, 2019 and the CPUC on July 11, 2019.

The USFS coordinated closely with SDG&E on a number of design changes on Phase II of C440 from 2016 to 2019. USFS resource specialists identified areas where undergrounding would cause impacts to resources, including riparian conservation areas, sensitive and endangered species, designated critical habitat for endangered species, cultural/archaeological sites, wetlands, vernal pools, and subsurface resources (e.g., hydrology), that could potentially be avoided or minimized by rebuilding the existing line and leaving it in an overhead configuration. Per the USFS ROD, the Forest Service Manual and Handbooks provide policy direction regarding special use management¹ on USFS land, including the following direction provided in Chapter 2720 for power lines up to and including 35 kV:

“...The authorizing officer shall require undergrounding of existing aerial power line installations, especially when the holder proposes those lines for upgrading, replacement, or reconstruction, except where the environmental analysis clearly indicates that aerial construction provides better protection for National Forest resource and environmental values.”

As a result, the final design for C440 includes in total approximately 14.1 miles of undergrounding analyzed as part of the Proposed Project, as well as considered in the Federal Preferred Alternative. A comparison of the Proposed Project to the final design for the entire C440 alignment is attached hereto at Attachment A: C440 Overview Compare Map.

On March 28, 2019, the USFS determined that the design changes, summarized below, remain within the scope of the ROD and the analysis in the Final EIR/EIS. A copy of the USFS’s letter is included at Attachment B: USFS Letter Regarding C440 Design. In addition, the USFS drafted a Supplemental Information Report in April 2020 confirming that no further documentation is required for the National Environmental Policy Act.

¹ Special use management policy is found in sections 2700, 2710, and 2720 of the Forest Service Manual.

Design Changes from the Federal Preferred Alternative

The following design changes were made from the Federal Preferred Alternative in coordination with the USFS for Phase II of C440:

- On Mount Laguna Drive, undergrounding within the existing road and removal of overhead lines was included in the final design where feasible, but some overhead rebuild was still required to avoid sensitive resources and service customers in this area.
- Undergrounding along Sunrise Highway was stopped north of Mount Laguna Drive due to an ethnographic village site that was identified by the USFS. To reduce impacts to this significant cultural resource site, a portion of the existing overhead line west of Sunrise Highway will be removed and rerouted on the east side of Sunrise Highway as new overhead.
- Due to concerns expressed by the USFS regarding subsurface resources (i.e., hydrology) and the potential to create a dam effect that prevents water flow in the area, the final design includes the overhead rebuild, rather than undergrounding, of the existing overhead parallel to Los Huecos Road.
- The Federal Preferred Alternative included undergrounding to individual recreation cabins within the Historic Recreation Cabin Tracts. Converting the existing overhead service lines to an underground configuration would require the exterior of these historic cabins to be modified in order to accommodate the new underground utility connection. Therefore, to prevent modifications to these historic cabins in accordance with Mitigation Measure (MM) CUL-2, overhead rebuild was included in the final design for this area. Additionally, the area where the historic cabins are located is a highly sensitive area for prehistoric cultural resources. To reduce impacts to cultural resources, this portion of the line will be rebuilt in an overhead configuration.
- Near Little Laguna Lake, to prevent impacts to sensitive biological and cultural resources, the final design includes overhead rebuild rather than undergrounding.
- Due to concerns expressed by the USFS regarding biological resources, vernal pools, subsurface resources (i.e., hydrology), and the potential to create a dam effect that prevents water flow in the area, as well as potential impacts to sensitive cultural resources, the final design includes overhead rebuild instead of undergrounding within the existing road near the Laguna Campground.
- Because the Al Bahr Shrine Camp was destroyed and will not be rebuilt or re-opened, the overhead line that previously serviced the facility is no longer needed and was not included in the final design.

Additionally, section 43.1 of CPUC General Order No. 95 provides that Heavy Loading criteria shall apply in all parts of the State of California where the elevation exceeds 3,000 feet above sea level. Because Phase II of C440 occurs at an elevation range of 3,800 to 5,875 feet above sea level and winds can be between 85 and 111 miles per hour, the heavy loading criteria specified in

CPUC General Order No. 95 was utilized in the final design to accommodate stress caused by wind and ice. Abiding by these criteria required additional poles and anchors in some areas. Accordingly, SDG&E included the addition of new anchors and 28 new interset poles to address ice loading and blowout (i.e., horizontal movement of conductors) during weather events.² Engineering avoided adding facilities within environmentally sensitive areas when feasible by micro-siting the facilities in coordination with cultural resource specialists and Native American monitors.

A map comparing the Proposed Project to the final design for Phase II of C440 (i.e., NTP request #27) is attached at Attachment C: Phase II of C440 Compare Map. All underground components that were carried forward from the Federal Preferred Alternative are included under a separate header (Federal Preferred Alternative) in the legend for the final design. Table 1: Phase II of C440 Undergrounding Comparison displays the miles of undergrounding that was anticipated for the Proposed Project and Federal Preferred Alternative, and what is included in the final design.

Table 1: Phase II of C440 Undergrounding Comparison

Project Design	Miles of Undergrounding
Proposed Project	0.6
Federal Preferred Alternative	14.3
Final Design	3.3 ³

Minor Project Refinement Approval Criteria

The final design for Phase II of C440 is located within the geographic boundary of the Final EIR/EIS study area, which is depicted in Figure ES-1 Regional Overview Map in the Final EIR/EIS. In addition, the final design will not conflict with any MM or applicable law or policy, and it will not trigger an additional permit requirement or permit that was not previously contemplated in the Final EIR/EIS. Lastly, the final design will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact analyzed in the Final EIR/EIS as it is consistent with both the Proposed Project analysis for overhead rebuild and Federal Preferred Alternative analysis for undergrounding (i.e., C440 Mount Laguna Underground Alternative). Consistency of the final design with the Final EIR/EIS analysis is discussed in more detail for each resource in the following section.

Resource Analysis

Visual Resources

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, undergrounding this portion of C440 would enhance the overall scenic quality of views available from Sunrise Highway and minimize contrasts associated with the installation of the taller steel

² The engineering required for these weather conditions was taken into account after the Proposed Project design.

³ This number only includes the underground work where excavation/trenching is anticipated (i.e., new underground and replacement of existing cable and conduit). Excavation/trenching is not anticipated for replacement of existing cable, removal of existing cable, and abandonment of distribution cable and conduit in place.

poles that were anticipated for the Proposed Project. As discussed in the analysis for the Proposed Project, within the Laguna Mountain Recreation Area, replacement poles would be routinely obscured from view by mature pine trees adjacent to Sunrise Highway, but some replacement poles may be visible above the trees and may not blend into the landscape as well as the existing wood poles do. Although some poles are located close to Sunrise Highway and would be clearly visible to motorists, views of the poles would be brief and would occur in conjunction with neighboring USFS facilities (e.g., lodges, fire station). Overall, the poles would be relatively difficult to detect within the Laguna Mountain Recreation Area.

As discussed above, in order to meet the Heavy Loading criteria of CPUC General Order No. 95, the final design includes 28 additional interset poles that were not included in the Proposed Project. These poles will not exceed the maximum pole height or pole diameter range analyzed in the Final EIR/EIS and will occur within the existing distribution right-of-way. Thus, the analysis for the Proposed Project, which states that pole replacement within the Laguna Mountain Recreation Area would not adversely impact scenic resources visible from Sunrise Highway, is applicable to these poles. Overall, the additional overhead rebuild included in the final design will result in more impacts to scenic resources than was anticipated for the Federal Preferred Alternative; however, it will be consistent with what was analyzed for the Proposed Project. In addition, implementation of MM VIS-1 for applicable poles will minimize the visual contrast of those poles within the landscape. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in the Final EIR/EIS.

Air Quality

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, additional undergrounding would increase construction-generated emissions (i.e., equipment emissions and fugitive dust levels) when compared to what was anticipated for the Proposed Project. Although there are sensitive receptors in the Mount Laguna Recreation Area, construction activities and emissions would not occur in one place for an extended period of time, so these sensitive receptors would not be exposed to substantial pollutant concentrations.

Due to the reduction in the miles of undergrounding, construction-generated emissions associated with the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. In addition, Applicant-Proposed Measure (APM) AIR-01 through APM AIR-05 will be implemented to reduce emissions and impacts to sensitive receptors. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final EIR/EIS.

Biological Resources

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, temporary impacts to biological resources would be greater than what was anticipated for the Proposed Project due to the removal of vegetative cover from trenching and grading activities associated with undergrounding. Approximately 3.3 miles of undergrounding was anticipated to occur

outside of roadways.⁴ However, according to the Final EIR/EIS, overall temporary and permanent impacts to loss of vegetation, temporary and permanent loss of preserve areas, introduction of non-native or invasive plant species, direct or indirect effects on special-status species, wildlife disturbance and direct mortality, conflict with conservation plans, and impediment of local or regional movement of wildlife would be substantially the same as what was analyzed for the Proposed Project. As a result, impacts to biological resources associated with the final design will be similar to or less than what was anticipated for the Federal Preferred Alternative. All APMs and MMs defined in the Project’s Mitigation Monitoring, Compliance, and Reporting Program—as well as other permit and plan conditions—will be implemented as applicable to minimize or mitigate for impacts to biological resources. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final EIR/EIS.

Cultural and Paleontological Resources

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, it was determined that the cumulative impacts

“would be greater than those described for SDG&E’s proposed project as this alternative would create a greater disturbance area due to trenching activities to underground the 12 kV lines and therefore greater potential to impact cultural resources than reconstruction overhead and in place as proposed. However, with compliance with federal laws and implementation of SDG&E’s APMs and mitigation measures presented in Section D.5, adverse and significant impacts would be mitigated to less than significant and therefore, impacts would not be cumulatively considerable.”

Due to the reduction in the miles of undergrounding in the final design, there will be less disturbance and therefore less potential to impact cultural resources than what was anticipated for the Federal Preferred Alternative. Instead, disturbance will be more consistent with what was analyzed for the Proposed Project.

Impacts to cultural resources will be less than significant with implementation of the proposed avoidance and minimization recommendations in the NTP #27 Historic Properties Management Plan Appendix A Update and development of an Historic Properties Treatment Plan to offset effects identified to the *Ah-ha’ Mut-ta-ti’e* Traditional Cultural Property. All APMs and MMs defined in the Project’s Mitigation Monitoring, Compliance, and Reporting Program and the Historic Properties Management Plan will be implemented as applicable to minimize or mitigate for impacts to cultural resources.

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, trenching and excavation required for undergrounding would result in greater soil disturbance than excavation for poles. As a result, paleontological resources could be significantly impacted by this alternative.

⁴ The final design includes approximately 3.3 miles of ground-disturbing undergrounding work; however, approximately 2.9 miles of that work is located within existing roads or developed areas.

Due to the reduction in the miles of undergrounding, there will be less disturbance of undiscovered paleontological resources associated with the final design than what was anticipated for the Federal Preferred Alternative; instead, disturbance will be more consistent with what was analyzed for the Proposed Project. In accordance with APM CUL-08, the Paleontological Monitoring & Treatment Plan was updated to include the final design and any poles that require monitoring in order to mitigate potential impacts to paleontological resources.⁵ Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to paleontological resources as identified in the Final EIR/EIS.

Greenhouse Gases

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, additional trenching and excavation activity and associated emissions would increase construction-related greenhouse gas (GHG) emissions when compared to what was anticipated for the Proposed Project. However, similar to the Proposed Project, this alternative would not meet or exceed the County of San Diego Climate Action Plan criteria for annual grading and land clearing.

Due to the reduction in the miles of undergrounding, construction-related GHG emissions associated with the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to GHG emissions as identified in the Final EIR/EIS.

Public Health and Safety

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, trenching and excavation required for undergrounding would result in greater and more invasive soil disturbance than excavation for poles, which would increase the potential to encounter contaminated soils. However, given the rural nature of the area, there would not be a substantial change concerning the presence of hazardous materials or public safety issues.

Due to the reduction in the miles of undergrounding, there will be less disturbance soil disturbance associated with the final design than what was anticipated for the Federal Preferred Alternative; instead, disturbance will be more consistent with what was analyzed for the Proposed Project. In addition, MM PHS-1, MM PHS-2, MM PHS-5, and MM PHS-6 will be implemented to mitigate impacts to public health and safety. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public health and safety as identified in the Final EIR/EIS.

Fire and Fuels Management

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, construction activities related to undergrounding would still introduce a variety of ignition sources to the area, similar to what was anticipated for the Proposed Project. However, undergrounding would significantly reduce the probability of a wildfire during operations when compared to an overhead rebuild.

⁵ The updated plan was submitted to the USFS on March 20, 2020.

The additional overhead rebuild included in the final design will result in a higher probability of a wildfire during operations than what was anticipated for the Federal Preferred Alternative. Because the final design includes more undergrounding than was anticipated in the Proposed Project, the probability of a wildfire from the final design will be lower than what was anticipated for the Proposed Project. Implementation of the Project's Construction Fire Prevention/Protection Plan and the Project's Operations and Maintenance Fire Prevention/Protection Plan will reduce the risk of wildfire caused by construction, operations, and maintenance. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to fire and fuels management as identified in the Final EIR/EIS.

Hydrology and Water Quality

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, trenching and grading activities would be greater than what was anticipated for the Proposed Project, which would increase the risk of erosion. However, there would not be a substantial change regarding non-stormwater discharges during construction. In addition, there would only be an incremental increase in the amount of water needed during construction.

Due to the reduction in the miles of undergrounding, impacts from erosion and stormwater runoff associated with the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. In addition, implementation of APM HYD-01 through APM HYD-10 and MM HYD-1 (i.e., best management practices and a Storm Water Pollution Prevention Plan) will mitigate impacts to water quality. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to hydrology and water quality as identified in the Final EIR/EIS.

Land Use

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, additional undergrounding would increase the number of sensitive receptors (i.e., residences and recreationists) that could be affected by construction activities. However, similar to the Proposed Project, no land use impacts regarding the division of an established community would occur and there would be no conflicts with local policies, ordinances, or regulations.

Due to the reduction in the miles of undergrounding, impacts to sensitive receptors that are associated with the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. Public noticing (i.e., public venue notices, newspaper ads, and public mailers) for the final design has occurred in accordance with MM LU-1. In addition, excavation and traffic control permits from the County of San Diego were submitted to the CPUC and USFS on April 16 and 17, 2020, in accordance with MM LU-4. Therefore, the final design will not result in new significant impacts or a substantial increase in the severity of a previously analyzed impact to land use as identified in the Final EIR/EIS.

Noise

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, construction noise associated with trenching and excavation activities would be greater, which would result in greater potential to affect sensitive receptors than what was anticipated for the Proposed Project. However, construction activities and emissions would not occur in one place for an extended period of time.

Due to the reduction in the miles of undergrounding, construction-related noise associated with the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. In addition, implementation of noise-related MMs and APMs will mitigate short-term impacts to sensitive receptors associated with construction noise. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise as identified in the Final EIR/EIS.

Public Services and Utilities

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, additional undergrounding would not require new or expanded public facilities and services, which is consistent with what was anticipated for the Proposed Project. AT&T has chosen to not include its facilities in the underground trench package of the final design, but SDG&E and AT&T are coordinating regarding the transfer of AT&T facilities that are currently co-located with SDG&E facilities from existing poles to new poles, in accordance with MM PSU-1. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public services and utilities as identified in the Final EIR/EIS.

Recreation

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, trenching and excavation required for undergrounding would be more disruptive to access and visitation within the Laguna Mountain Recreation Area than what was anticipated for the Proposed Project. However, like the Proposed Project, there would be no impacts resulting from unauthorized access.

Due to the reduction in the miles of undergrounding, impacts to recreationists from the final design will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. In addition, implementation of APM TRANS-01, APM TRANS-04, APM TRANS-05, and MM LU-1 will reduce short-term, temporary conflicts between recreationists and construction activities within the Laguna Mountain Recreation Area. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to recreation as identified in the Final EIR/EIS.

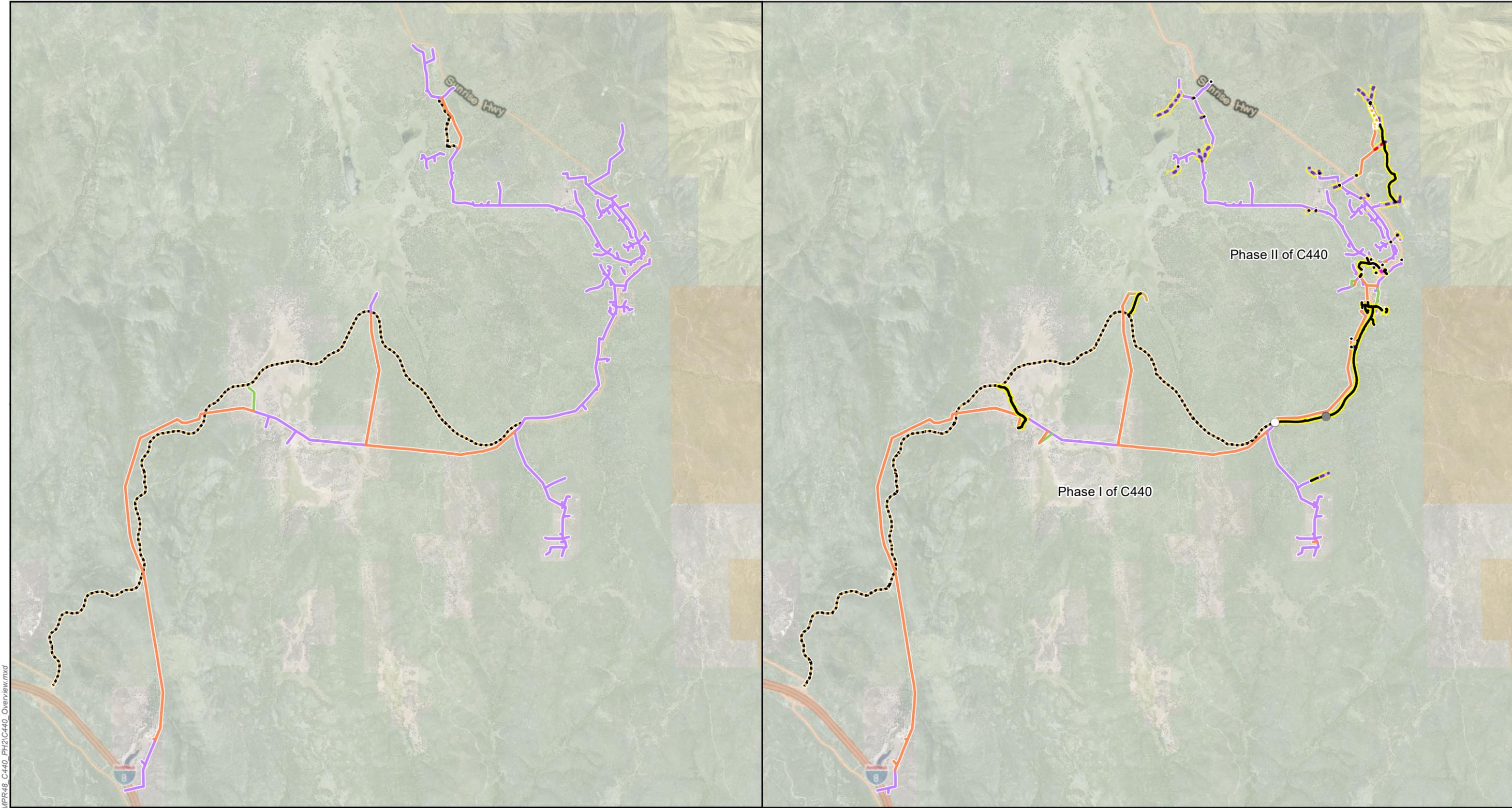
Transportation and Traffic

As discussed in the analysis for the C440 Mount Laguna Underground Alternative, additional undergrounding would result in greater temporary impacts to transportation, traffic, and access

along roadways in the Laguna Mountain Recreation Area than what was anticipated for the Proposed Project.

Due to the reduction in the miles of undergrounding, potential temporary impacts to area roadways will be lower than what was anticipated for the Federal Preferred Alternative and more consistent with what was analyzed for the Proposed Project. In addition, implementation of APM TRANS-01 through APM TRANS-05 and MM LU-4 will reduce potential temporary impacts to area roadways. Therefore, the final design will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to transportation and traffic as identified in the Final EIR/EIS.

ATTACHMENT A: C440 OVERVIEW COMPARE MAP



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C440 Overview Compare Map

Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel
 - Removal
 - Undergrounding
 - Wood-to-Steel Replacement
 - Bureau of Indian Affairs Land
 - California Department of Parks and Recreation
 - U.S. Bureau of Land Management
 - U.S. Forest Service

- Final Design**
- Existing Underground
 - New Overhead Service
 - New Underground
 - Removal
 - Wood-to-Steel Replacement
- Federal Preferred Alternative**
- Abandon in Place
 - Existing Cable Replacement
 - Existing Conduit & Cable Replacement
 - New Underground
 - Underground Removal

- Overhead Segment Break Between Phases
- Underground Segment Break Between Phases
- Bureau of Indian Affairs Land
- California Department of Parks and Recreation
- U.S. Bureau of Land Management
- U.S. Forest Service

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ATTACHMENT B: USES LETTER REGARDING C440 DESIGN

File Code: 2600
Date: March 28, 2019

Tim Knowd
Project Manager
San Diego Gas and Electric
1010 Tavern Road
Alpine, CA 91901

Dear Mr. Knowd,

San Diego Gas and Electric (SDG&E) and the Cleveland National Forest (Forest) staff have been coordinating on the SDG&E Cleveland National Forest Power Line Replacement Projects, specifically the proposed undergrounding associated with Circuit 440 (C440) at Mount Laguna. Based on our internal review of SDG&E's engineering design for C440 dated March 5th 2019 and the project documents, I have determined that the proposal remains within the scope of my decision set forth in the Forest Service Record of Decision (ROD) for the project (2016). This letter provides the rationale for your records.

The ROD) authorized the relocation of all sections of C440 that cross National Forest System lands and indicated my preference for undergrounding of electric power lines where possible.¹ Undergrounding should occur when it provides the most protection for National Forest resources and values as compared to overhead power line replacement in the long-term,² consistent with Forest Service Policy.³ During the course of project implementation, my staff have identified areas on Mount Laguna where undergrounding would not be suitable due to adverse impacts to resources and values. This information has been communicated to SDG&E for integration into the engineering designs so that potential impacts from undergrounding remain within the scope of the Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) analysis⁴ and my decision in the Record of Decision (ROD).

Based on the information provided by my staff, I have determined that undergrounding on Mount Laguna is not appropriate along some sections of C440 due to: presence of riparian

¹ See ROD at 2-3.

² See e.g., ROD at 7 and 18 (long term benefits included: reduced habitat disturbance, reduced vegetation management needs, improved scenic integrity, and eliminating the risk of power line related wildfires).

³ Forest Service Manual 2700, Ch. 2720 – Special Uses Administration.

⁴ See e.g., EIR/EIS at B-34, D.2-109 (visuals), D.4-221 (biological resources), D.5-58 (cultural), D.8-56 (fire risk/ignition sources), and D.9-58 (hydrology/water quality).



conservation areas (RCAs); archeological sites prevalent in the area of the recreational residences considering that overhead lines are required to service the cabins; and some existing roads not having imported fill underneath that would ordinarily protect subsurface resources and processes during excavation (e.g., archeological sites and hydrology).⁵

One of the primary concerns with undergrounding is the potential effects on RCAs. Undergrounding includes installing a 5-6 foot deep trench, with electrical conduit at the bottom of the trench, after which the trench is filled with concrete and covered with topsoil. This could potentially create a dam which may affect water flow through the riparian area. This would not be consistent with the CNF Land Management Plan⁶ and so undergrounding lines in RCAs located at Mount Laguna will not be required under the ROD.

Based on the foregoing, I have determined that for most of the C440 Phase 2 work, National Forest resources and values are best protected by rebuilding many of the power lines overhead on Mount Laguna. Please continue to work with my staff to ensure the C440 project is implemented in accordance with the EIR/EIS and ROD. My staff will also continue to coordinate with you on other details of C440 Phase 2 work including potential work yards and access routes.

Thank you for sharing this updated design and for your commitment to ensuring the project is being implemented safely and expeditiously in accordance with the EIR/EIS and ROD.

Sincerely,



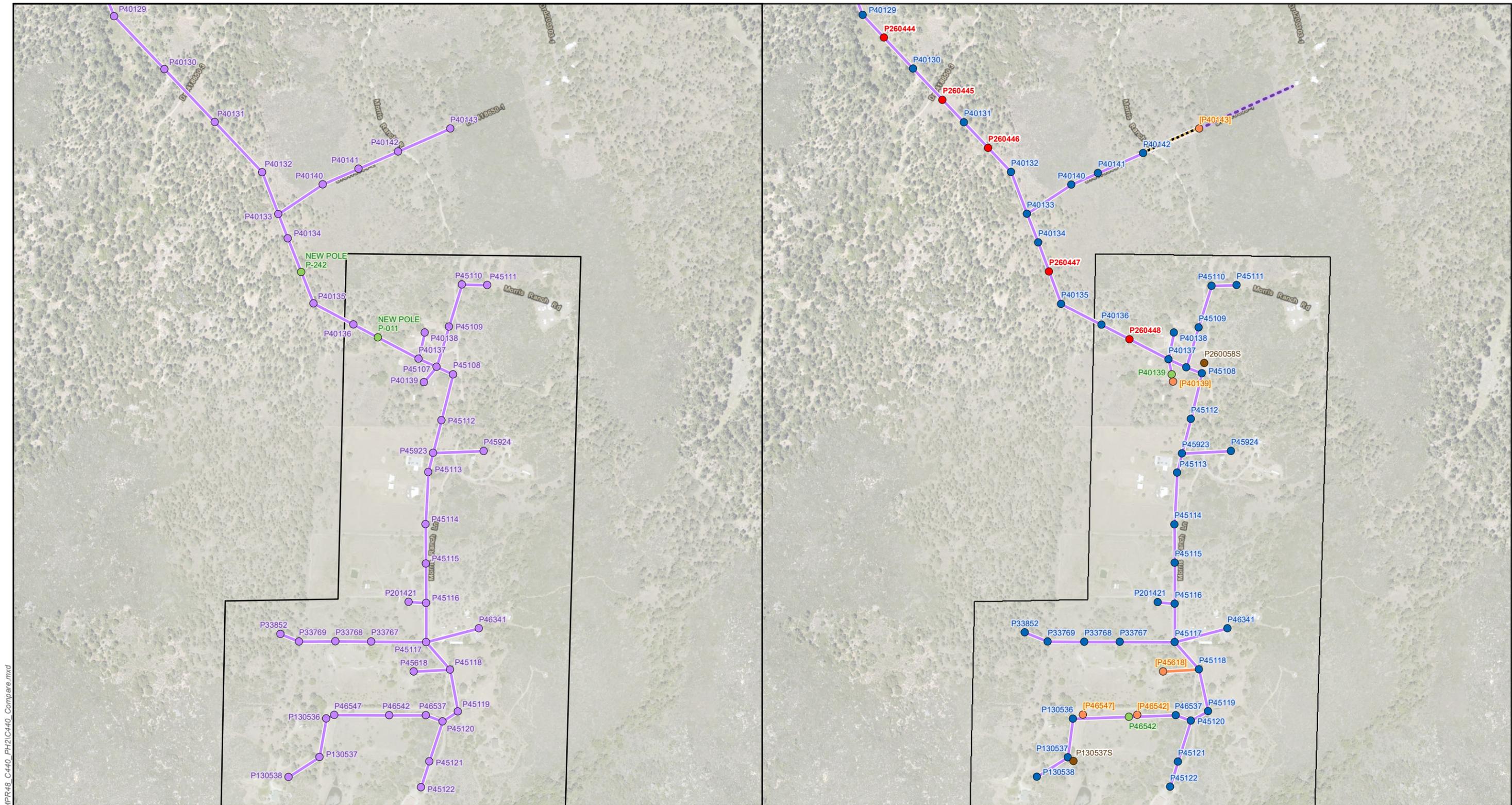
WILLIAM METZ
Forest Supervisor

⁵ See ROD at 7 (assumption was that underground ducts would be within the footprint of existing roads, most having imported fill present below grade to avoid impacts to native soils and resources existing therein).

See also EIR/EIS at D.5-59 (effects to cultural resources anticipated, but analysis assumed undergrounding would occur within existing paved roads on Mount Laguna).

⁶ USFS, 2005. LMP, Part 3, Appendix E (stating, “[i]n the riparian conservation areas that include perennial and intermittent streams, lakes, and wetlands, allow only those actions that maintain or improve long-term aquatic and riparian ecosystem health including quantity, quality and timing of stream flows.”).

ATTACHMENT C: PHASE II OF C440 COMPARE MAP

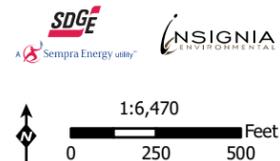


Phase II of C440 Compare Map 1 of 8

Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

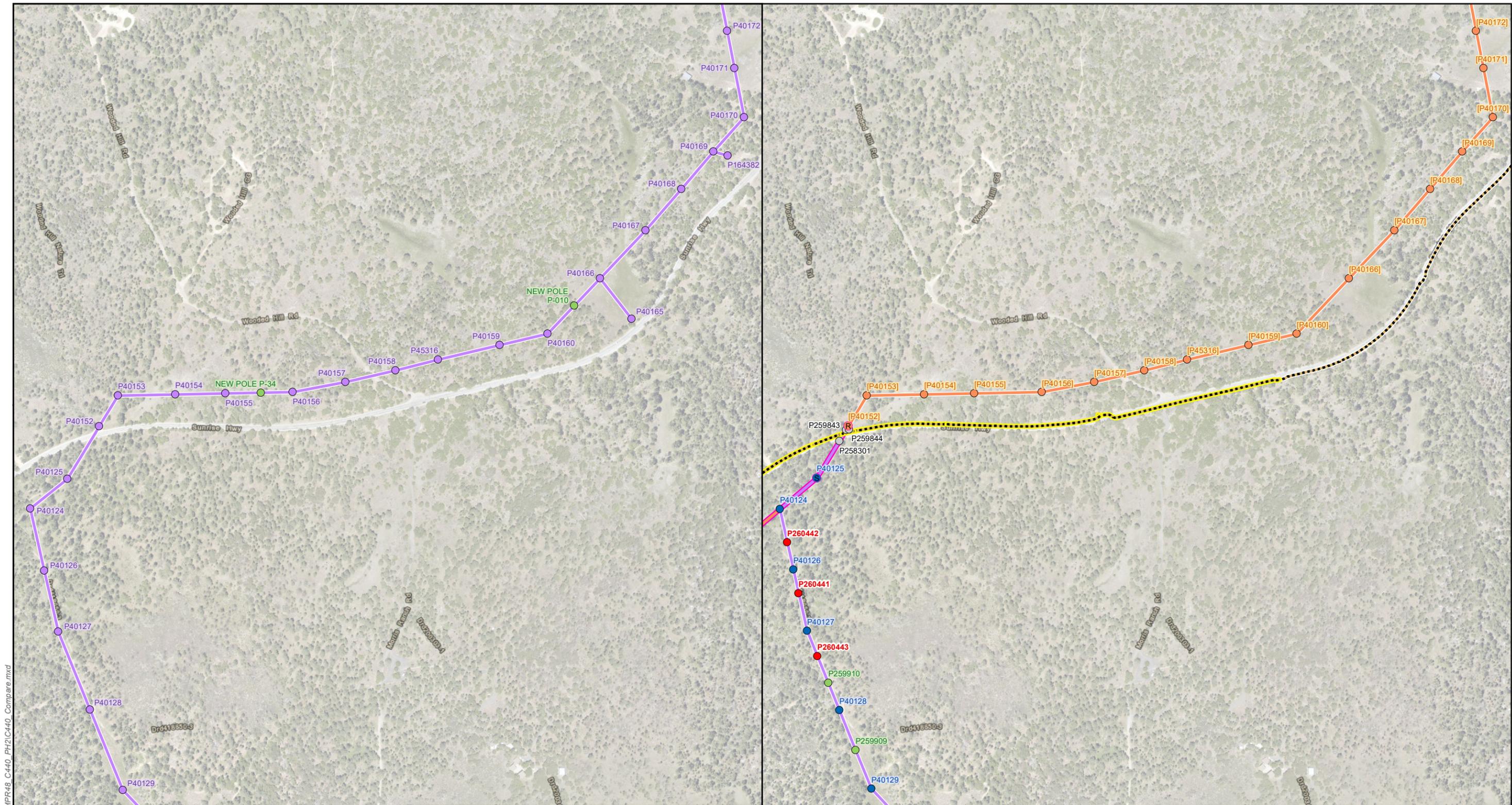
- NTP #27**
- New Steel Pole
 - Removal
 - Stub Pole
 - Wood-to-Steel Replacement - 12 kV Only
 - New Intersect Pole
- Federal Preferred Alternative**
- Wood-to-Steel Replacement
 - Existing Cable Replacement
 - New Underground
- U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.



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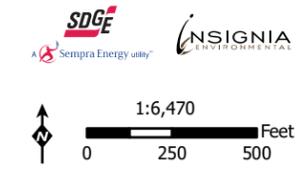
Phase II of C440 Compare Map 2 of 8

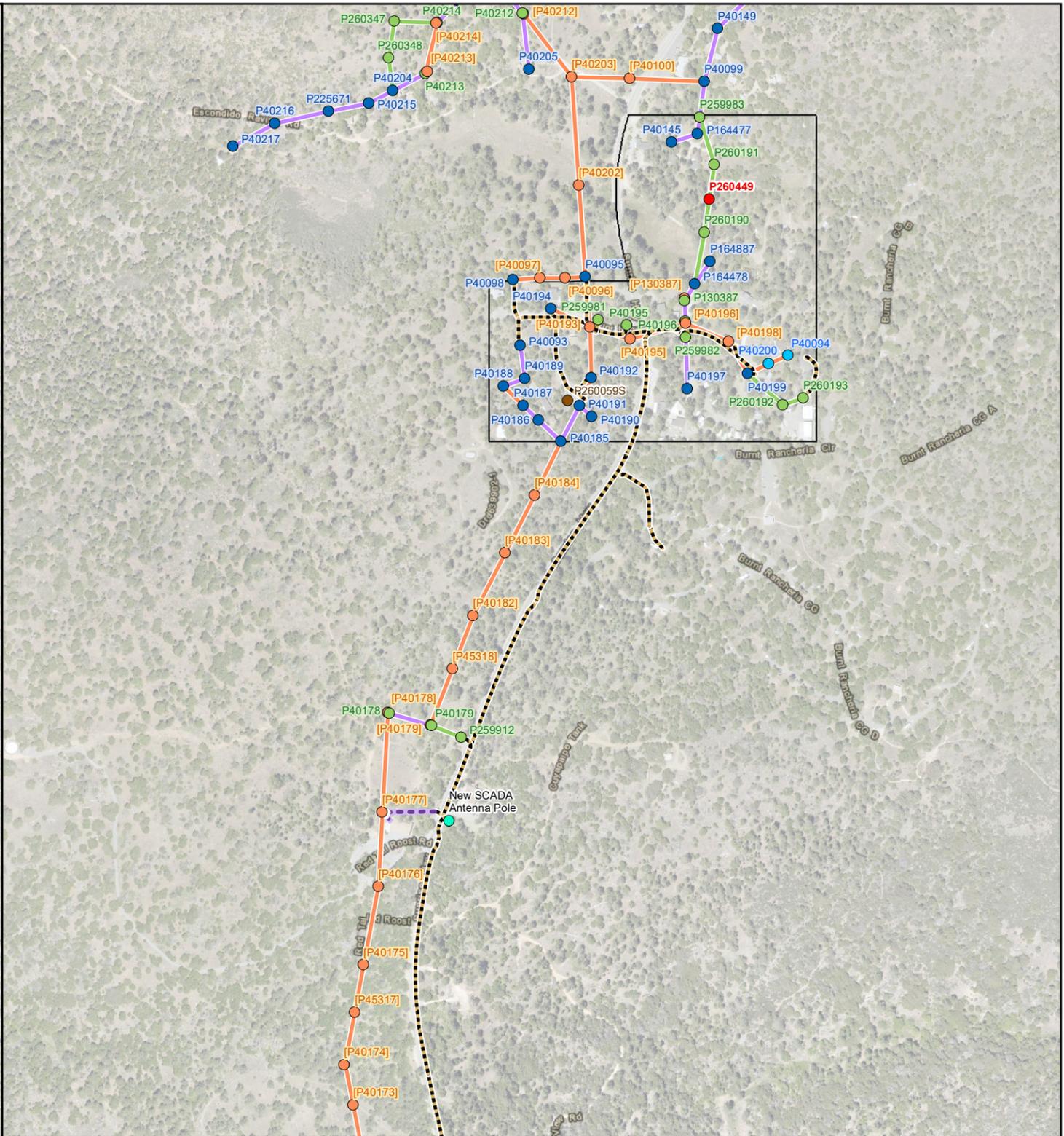
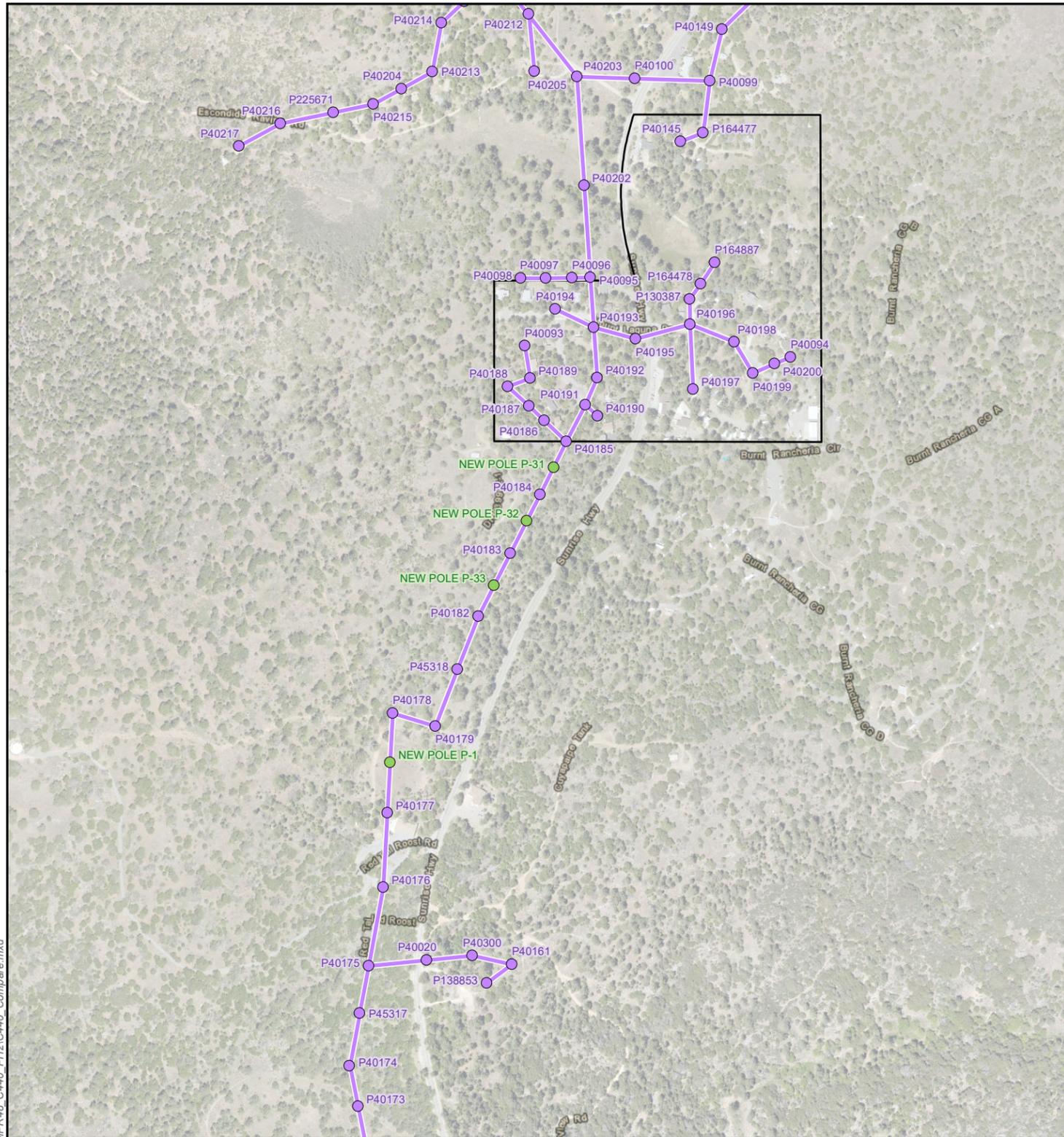
Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

- NTP #10**
- New Underground
- NTP #23**
- Removal
 - Wood-to-Steel Replacement - 12 kV Only
 - Removal
 - Wood-to-Steel Replacement
- NTP #27**
- New Steel Pole
 - Pole Top Work Only
 - Removal
 - Wood-to-Steel Replacement - 12 kV Only
 - New Interset Pole

- Federal Preferred Alternative**
- New Underground
 - U.S. Forest Service





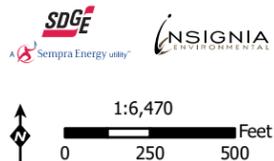
Phase II of C440 Compare Map 3 of 8

Cleveland National Forest Power Line Replacement Projects

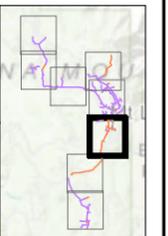
- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

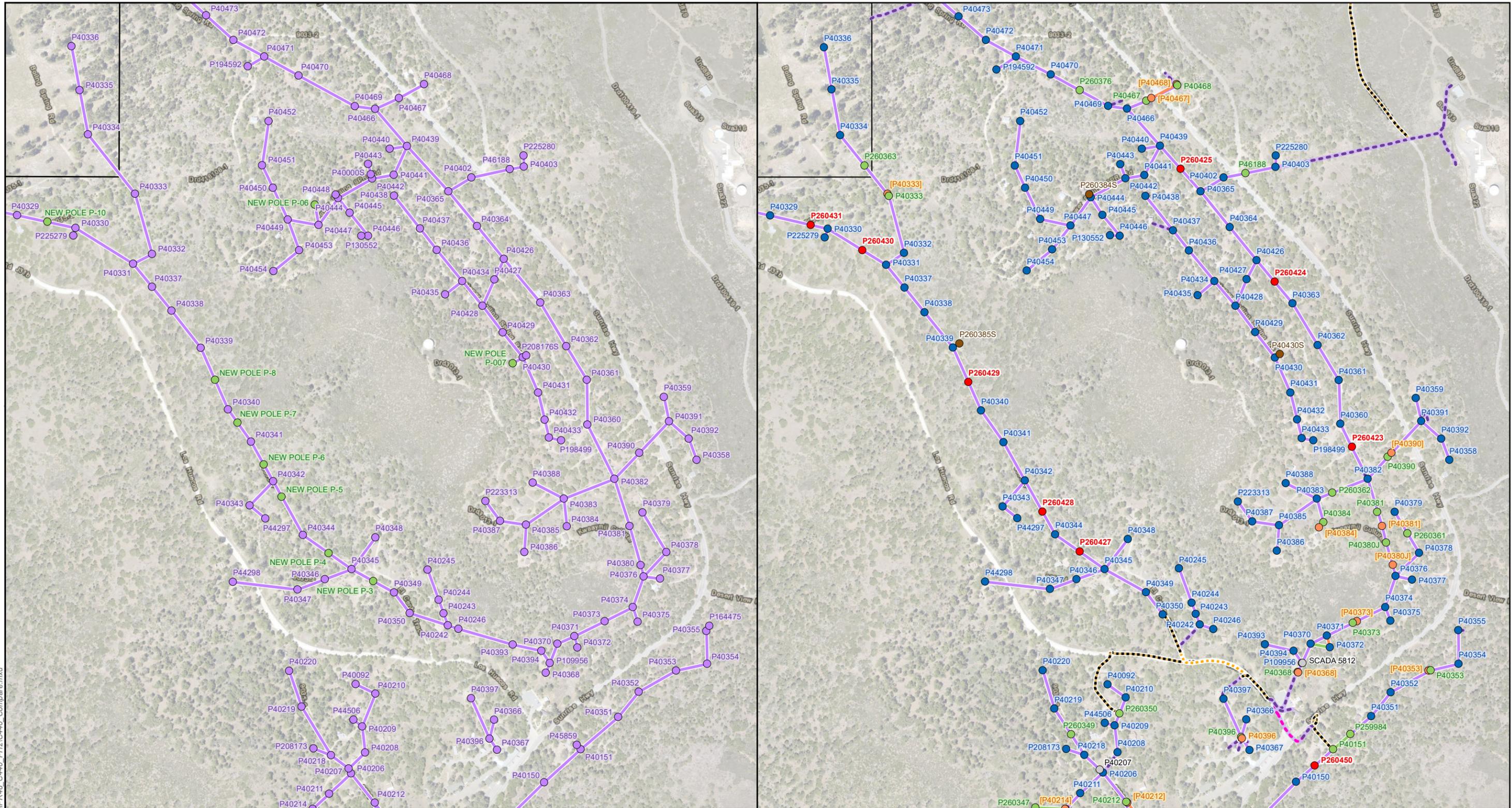
- NTP #27**
- New Communication Pole
 - New Steel Pole
 - Removal
 - Stub Pole
 - Top Pole
 - Wood-to-Steel Replacement - 12 kV Only
 - New Interset Pole

- Federal Preferred Alternative**
- Existing Cable Replacement
 - New Underground
 - Underground Removal
- U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.





Phase II of C440 Compare Map 4 of 8

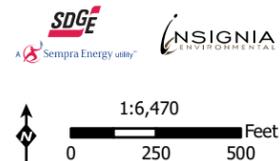
Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

- NTP #27**
- New Steel Pole
 - Pole Top Work Only
 - Removal
 - Stub Pole
 - Wood-to-Steel Replacement - 12 kV Only
 - New Interset Pole

- Federal Preferred Alternative**
- New Overhead Service
 - Removal
 - Wood-to-Steel Replacement
 - Existing Cable Replacement
 - Existing Conduit & Cable Replacement
 - - - New Underground
 - - - Underground Removal

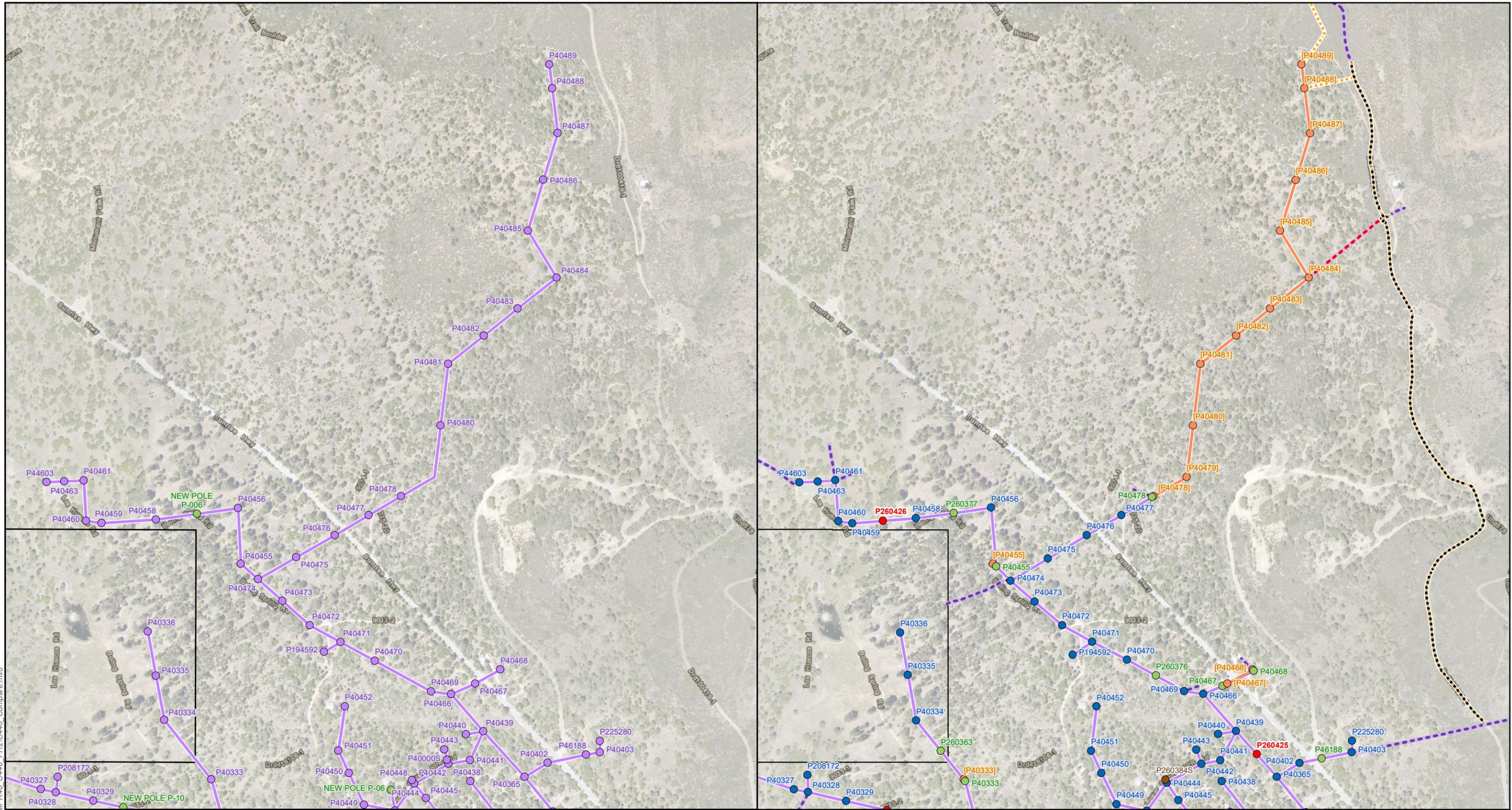
- U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.



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Phase II of C440 Compare Map 5 of 8

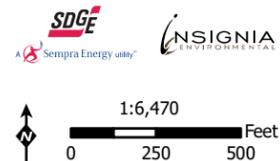
Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

- NTP #27**
- New Steel Pole
 - Removal
 - Stub Pole
 - Wood-to-Steel Replacement - 12 kV Only
 - New Intersect Pole

- Federal Preferred Alternative**
- Abandon in Place
 - Existing Cable Replacement
 - Existing Conduit & Cable Replacement
 - New Underground
 - Underground Removal

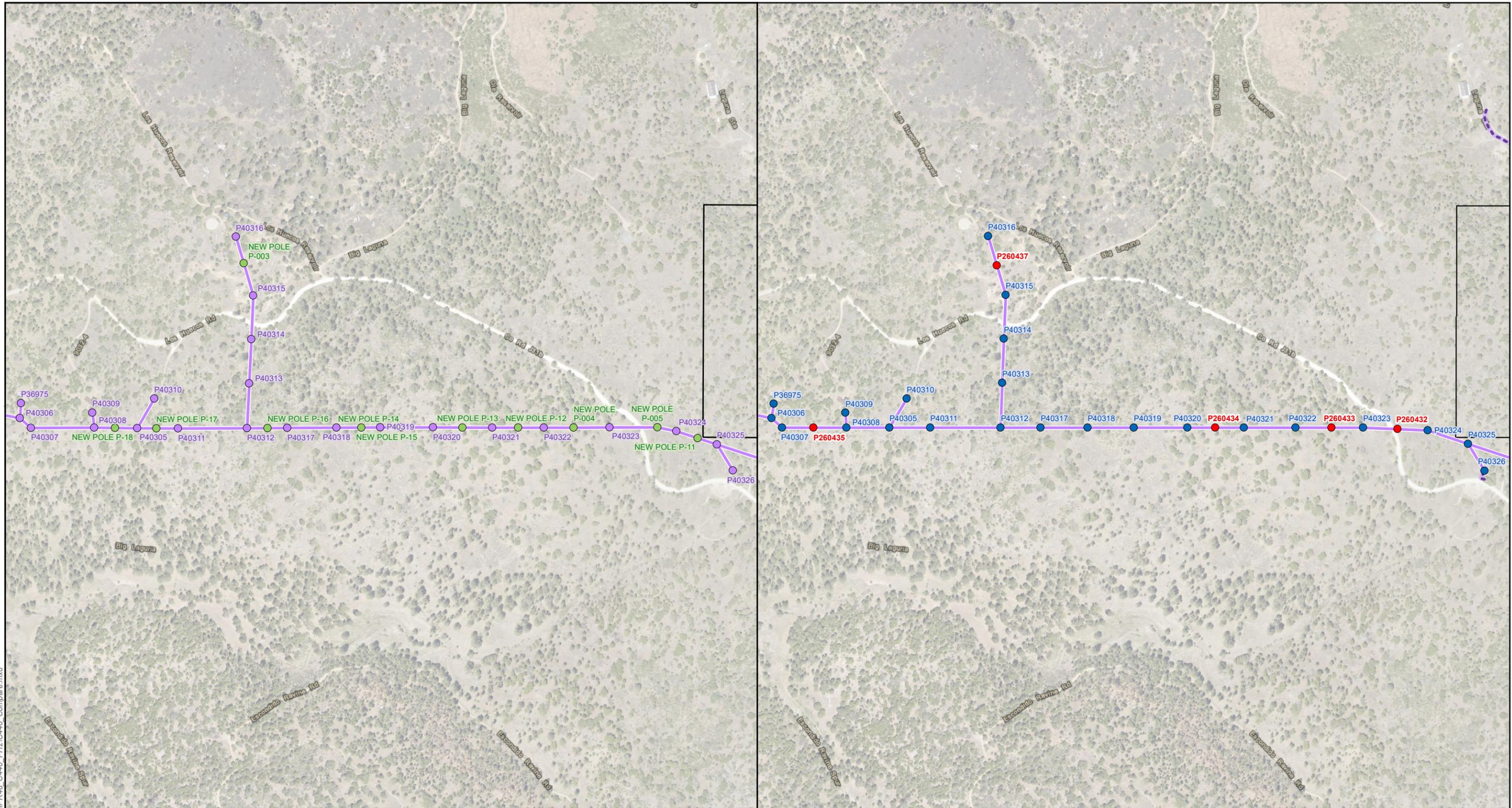
U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.



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Phase II of C440 Compare Map 6 of 8

Cleveland National Forest Power Line Replacement Projects

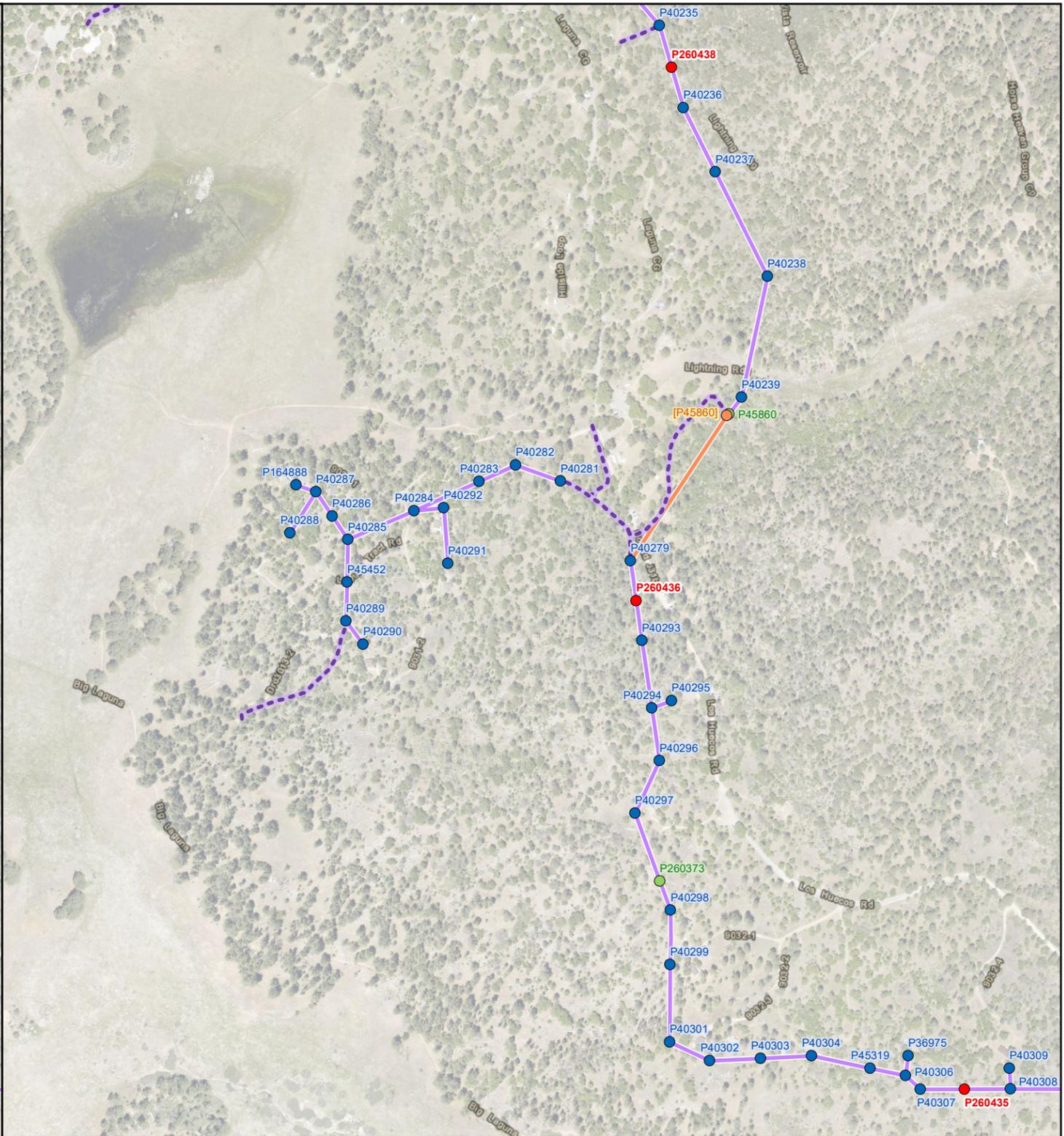
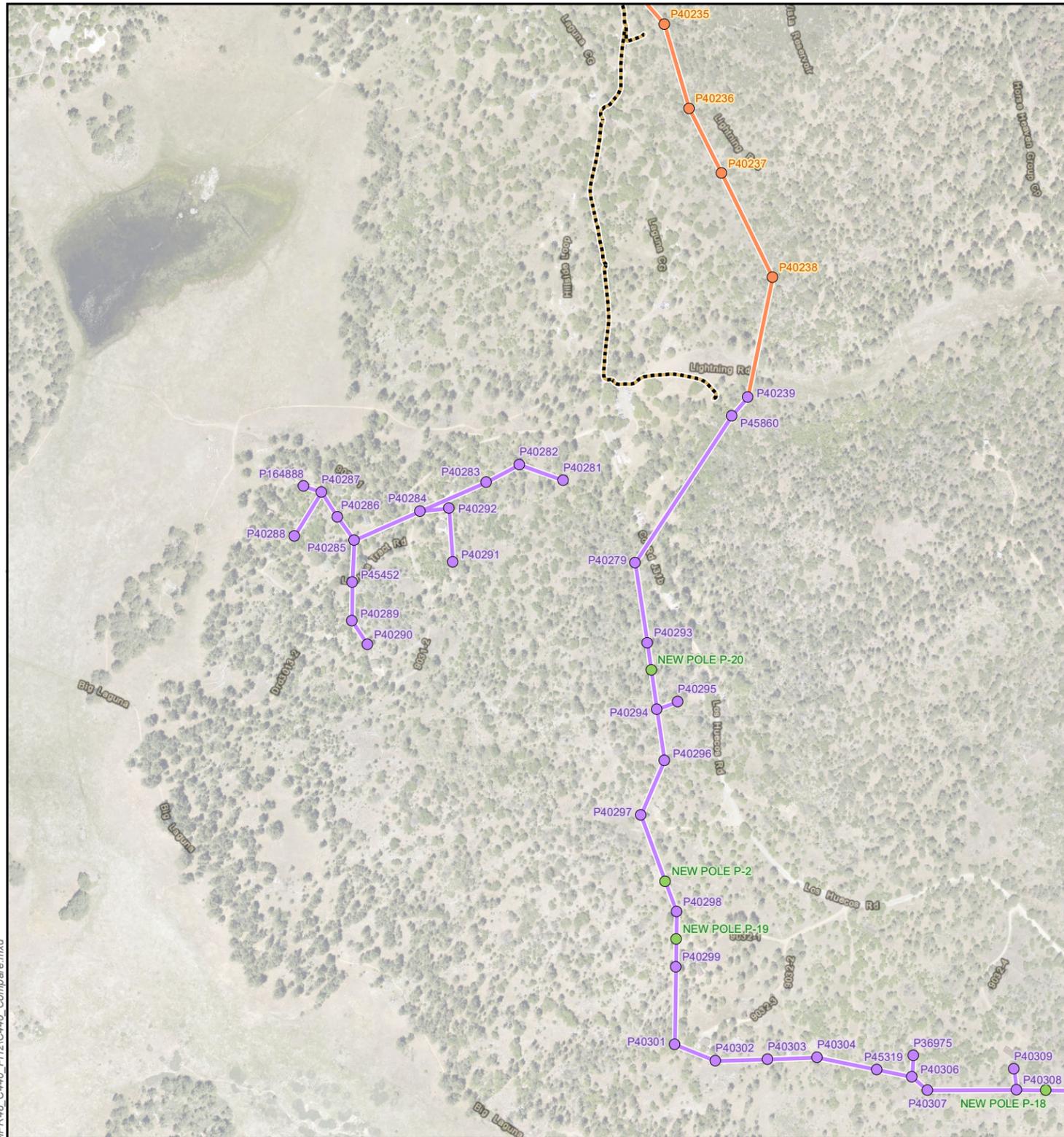
- Proposed Project**
- New Steel Pole
 - Wood-to-Steel Replacement
 - U.S. Forest Service

- NTP #27**
- Wood-to-Steel Replacement - 12 kV Only
 - New Interset Pole
- Federal Preferred Alternative**
- Wood-to-Steel Replacement
 - - - Existing Cable Replacement
 - - - New Underground
 - U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.

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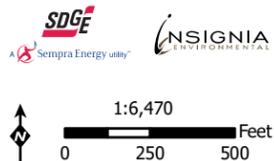


Phase II of C440 Compare Map 7 of 8

Cleveland National Forest Power Line Replacement Projects

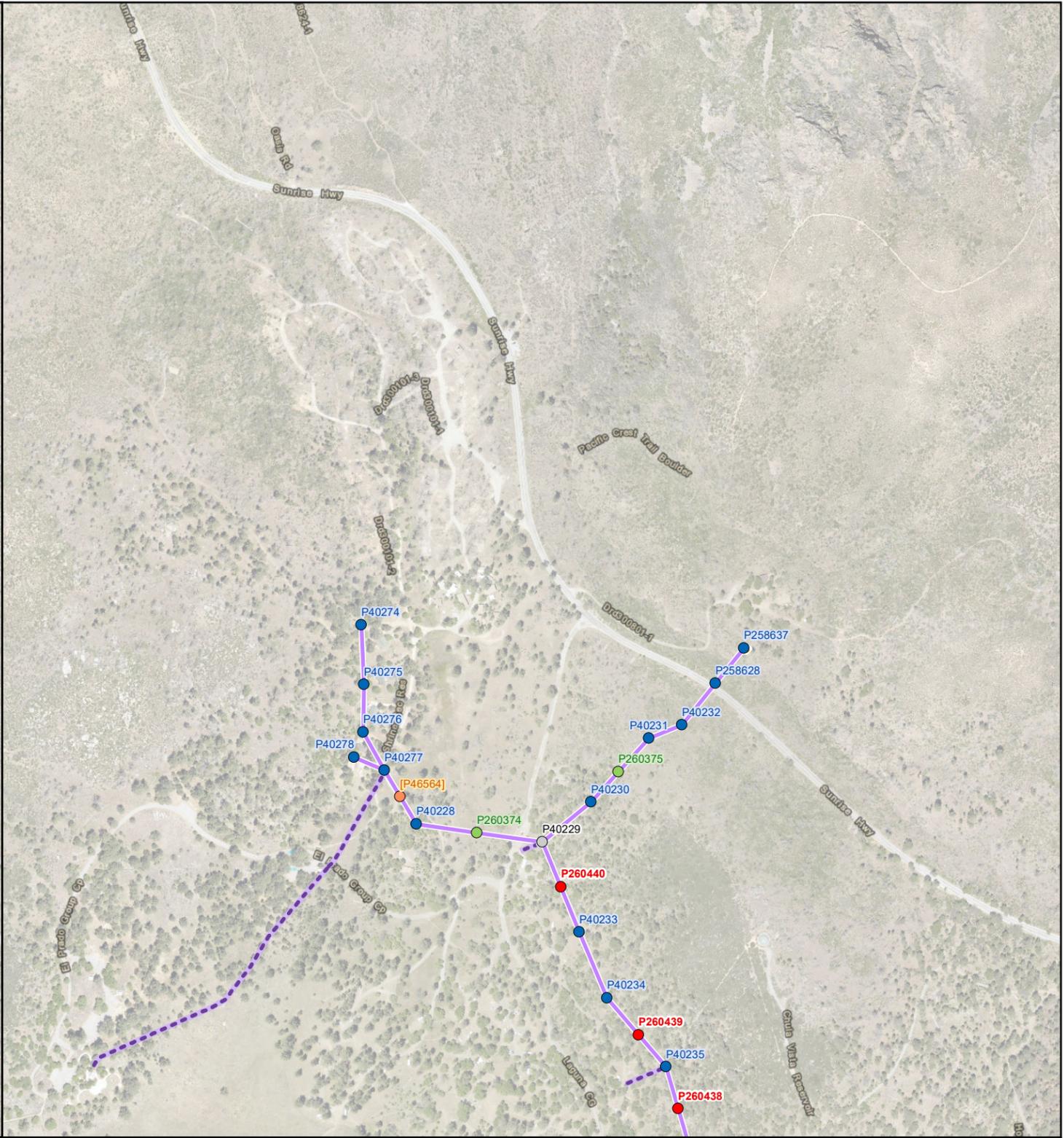
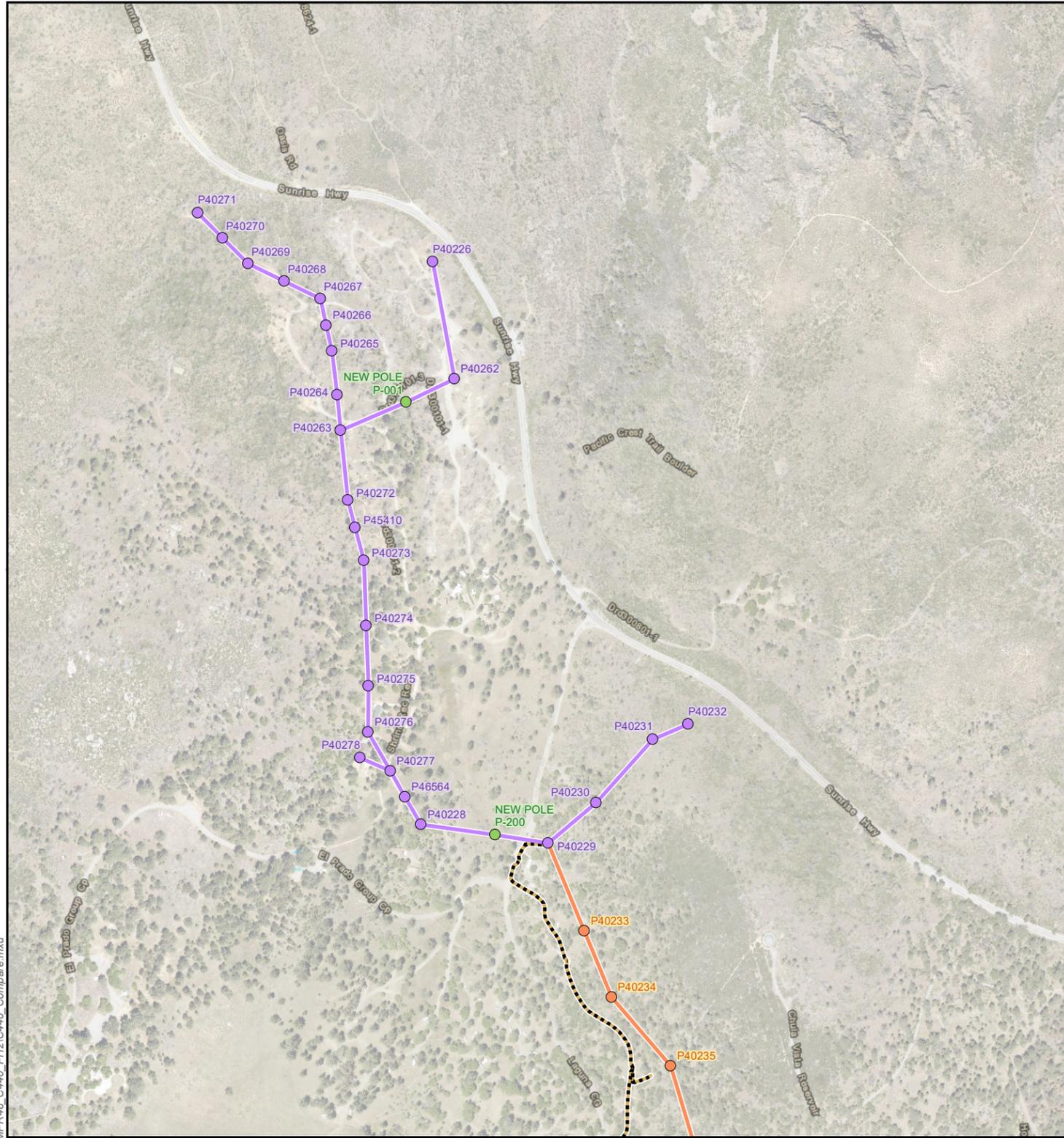
- Proposed Project**
- New Steel Pole
 - Removal
 - U.S. Forest Service
 - Wood-to-Steel Replacement
 - Undergrounding
 - Wood-to-Steel Replacement

- NTP #27**
- New Steel Pole
 - Removal
 - Wood-to-Steel Replacement - 12 kV Only
 - New Intersect Pole
 - Removal
 - Wood-to-Steel Replacement
 - Existing Cable Replacement
 - New Underground
 - U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.

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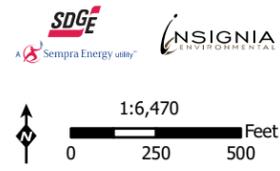


Phase II of C440 Compare Map 8 of 8

Cleveland National Forest Power Line Replacement Projects

- Proposed Project**
- New Steel Pole
 - Removal
 - Wood-to-Steel Replacement
 - U.S. Forest Service
 - Removal
 - Wood-to-Steel Replacement
 - Undergrounding

- NTP #27**
- New Steel Pole
 - Pole Top Work Only
 - Removal
 - Wood-to-Steel Replacement - 12 kV Only
 - New Intersect Pole
 - Wood-to-Steel Replacement
 - - - Existing Cable Replacement
 - - - New Underground
 - - - Underground Removal
 - U.S. Forest Service



Note: The Existing Cable Replacement components were inadvertently omitted from the Proposed Project data.

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