

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

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Revised February 2019

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
ACRONYMS.....	V
1. INTRODUCTION.....	1-1
2. PROPOSED PROJECT MODIFICATION DESCRIPTION.....	2-1
2.1 Proposed Project Modification Location	2-1
2.2 Proposed Project Modification Description.....	2-1
2.3 Permanent Land/Right-Of-Way Requirements.....	2-2
2.4 Temporary work areas	2-2
2.4.1 Guard Structures	2-21
2.4.2 Vegetation Clearing	2-23
2.4.3 Erosion and Sediment Control and Pollution Prevention during Construction.....	2-23
2.4.4 Cleanup and Post-construction Restoration	2-23
2.4.5 Construction Workforce, Schedule and Equipment.....	2-24
2.5 Operation and Maintenance	2-25
2.6 Anticipated Permits and Approvals	2-25
2.7 Applicant-Proposed Measures	2-25
3. ENVIRONMENTAL IMPACT ASSESSMENT	3.0-1
3.1 Aesthetics.....	3.1-1
3.1.1 Existing Conditions.....	3.1-1
3.1.2 Potential Impacts.....	3.1-1
3.2 Agriculture and Forestry Resources.....	3.2-1
3.2.1 Existing Conditions.....	3.2-1
3.2.2 Potential Impacts.....	3.2-1
3.3 Air Quality	3.3-1
3.3.1 Existing Conditions.....	3.3-1
3.3.2 Potential Impacts.....	3.3-1
3.4 Biological Resources	3.4-1
3.4.1 Existing Conditions.....	3.4-1
3.4.2 Potential Impacts.....	3.4-38
3.5 Cultural Resources	3.5-1
3.5.1 Existing Conditions.....	3.5-1
3.5.2 Potential Impacts.....	3.5-5
3.6 Geology, Soils, and mineral resources.....	3.6-1
3.6.1 Existing Conditions.....	3.6-1
3.6.2 Potential Impacts.....	3.6-1
3.7 Greenhouse Gas Emissions.....	3.7-1
3.7.1 Existing Conditions.....	3.7-1
3.7.2 Potential Impacts.....	3.7-1

3.8	Hazards and Hazardous Materials	3.8-1
3.8.1	Existing Conditions.....	3.8-1
3.8.2	Potential Impacts.....	3.8-1
3.9	Hydrology and Water Resources	3.9-1
3.9.1	Existing Conditions.....	3.9-1
3.9.2	Potential Impacts.....	3.9-2
3.10	Land Use and Planning	3.10-1
3.10.1	Existing Conditions.....	3.10-1
3.10.2	Potential Impacts.....	3.10-1
3.11	Noise	3.11-1
3.11.1	Existing Conditions.....	3.11-1
3.11.2	Potential Impacts.....	3.11-1
3.12	Paleontological Resources	3.12-1
3.12.1	Existing Conditions.....	3.12-1
3.12.2	Potential Impacts.....	3.12-1
3.13	Population and Housing.....	3.13-1
3.13.1	Existing Conditions.....	3.13-1
3.13.2	Potential Impacts.....	3.13-1
3.14	Recreation	3.14-1
3.14.1	Existing Conditions.....	3.14-1
3.14.2	Potential Impacts.....	3.14-1
3.15	Transportation and Traffic	3.15-1
3.15.1	Existing Conditions.....	3.15-1
3.15.2	Potential Impacts.....	3.15-1
3.16	Utilities and Public Service Systems	3.16-1
3.16.1	Existing Conditions.....	3.16-1
3.16.2	Potential Impacts.....	3.16-1
3.17	Wildfire.....	3.17-1
3.17.1	Existing Conditions.....	3.17-1
3.17.2	Potential Impacts.....	3.17-2
3.18	Energy	3.18-1
3.18.1	Existing Conditions.....	3.18-1
3.18.2	Potential Impacts.....	3.18-1
3.19	Tribal Cultural Resources	3.19-1
3.19.1	Existing Conditions.....	3.19-1
3.19.2	Potential Impacts.....	3.19-1
4.	APPLICANT-PROPOSED AND MEASURES AND MITIGATION MEASURES..	4-1
5.	SUMMARY OF IMPACTS	5-1
6.	REFERENCES.....	6-1

APPENDICES

I	Cultural Resources Survey Report
II	Jurisdictional Impact Site Assessment
III	Paleontological Resources Memo
IV	2019 Appendix G Comparison Table

LIST OF FIGURES

<u>Figure</u>	<u>Page</u>
2-1: Proposed Project Modification Location Map	2-3
2-2: Detailed Proposed Project Modification Maps	2-4
3.4-1: Vegetation Communities Map	3.4-3
3.4-2: Vernal Pool Map	3.4-23

LIST OF TABLES

<u>Table</u>	<u>Page</u>
2.4-1: Pole Access Sites	2-19
2.4-2: Guard Structures	2-22
2.4-3: Estimated Construction Equipment and Personnel	2-24
2.4-4: Anticipated Construction Equipment	2-24
3.4-1: Biological Surveys	3.4-1
3.4-2: Special-Status Plant Species	3.4-18
3.4-3: Special-Status Wildlife Species	3.4-37
3.4-4: Proposed Project Modification Impacts	3.5-39
3.5-1: Record Search Results within 0.25 Mile of the Proposed Project Modification Area	3.5-3
3.5-2: Field Survey Results within 98 feet (30 meters) of the Proposed Project Modification Area	3.5-4
5-1: Summary of Impacts Table	5-1

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ACRONYMS

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

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

1. INTRODUCTION

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

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

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

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2. PROPOSED PROJECT MODIFICATION DESCRIPTION

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

2.1 PROPOSED PROJECT MODIFICATION LOCATION

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

2.2 PROPOSED PROJECT MODIFICATION DESCRIPTION

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

The Proposed Project Modification includes the following activities:

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

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

2.3 PERMANENT LAND/RIGHT-OF-WAY REQUIREMENTS

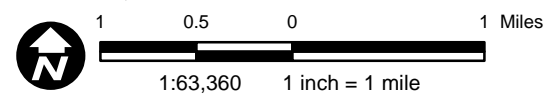
The Proposed Project Modification areas are located within SDG&E ROW. This ROW occurs on MCAS Miramar, San Diego Metropolitan Transit Development Board, and Eastgate Industrial Center Owners Association Inc. property. Access and all work on the existing transmission line are covered under SDG&E's existing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

2.4 TEMPORARY WORK AREAS

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

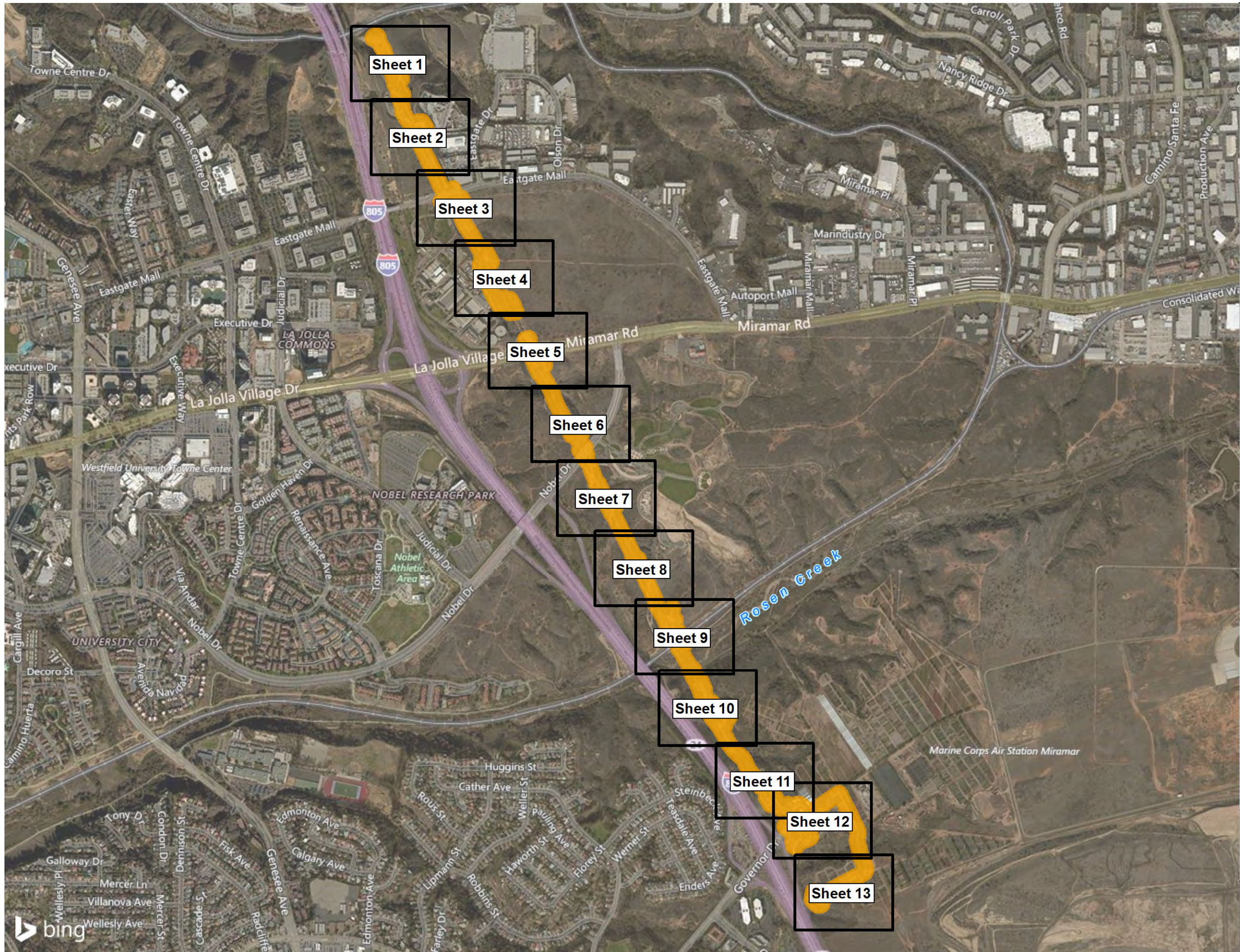


Source: SDGE, ESRI.



SXPQ - Sycamore to Peñasquitos 230kV Transmission Line Project

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- Legend**
- Sheet Index
 - Proposed Project Refinement Area

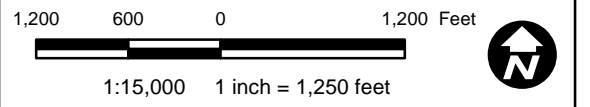
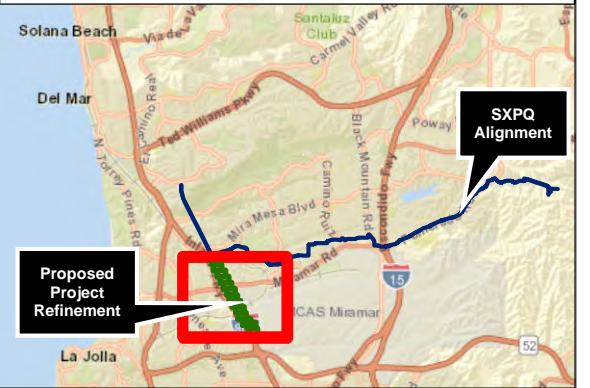
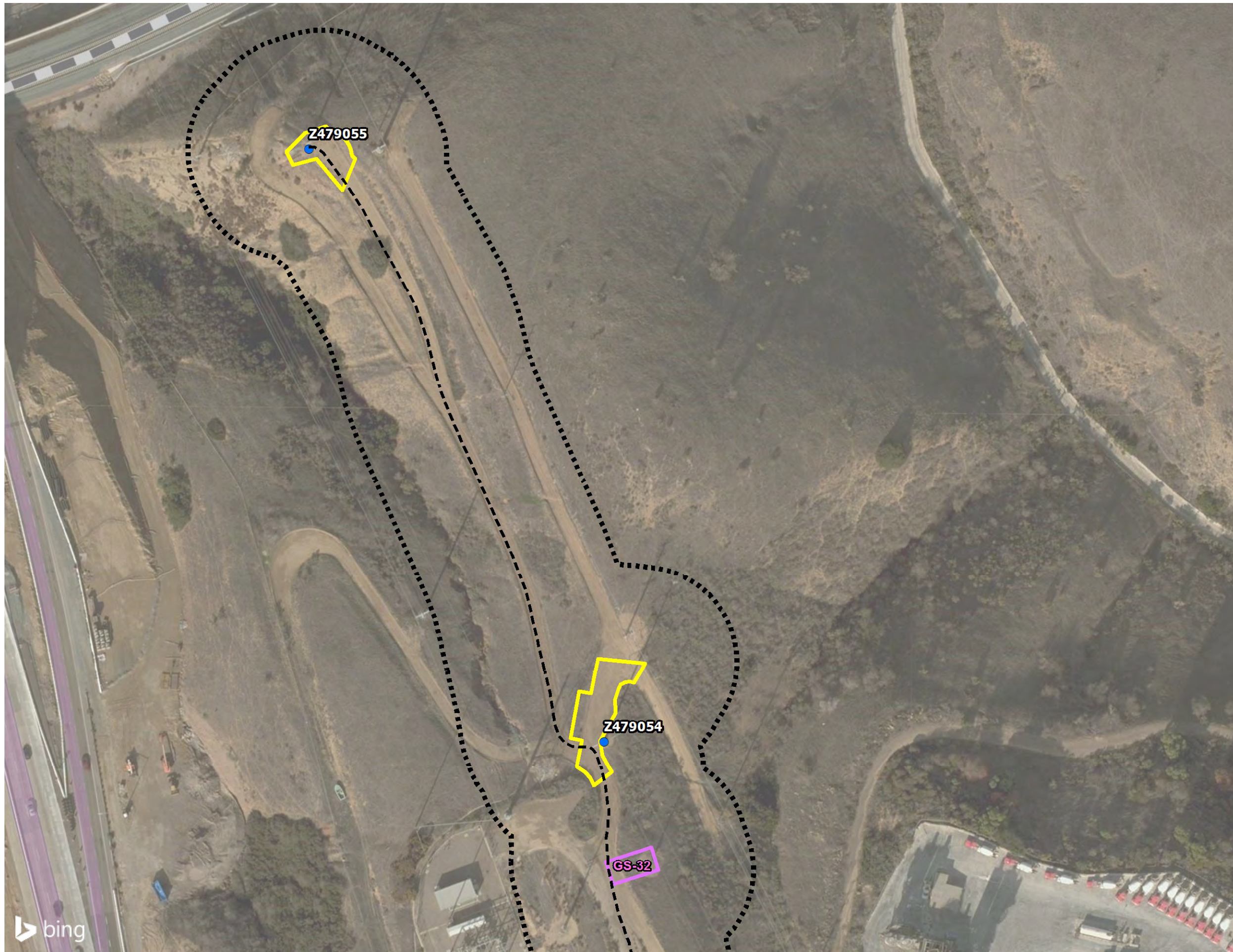


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet Index



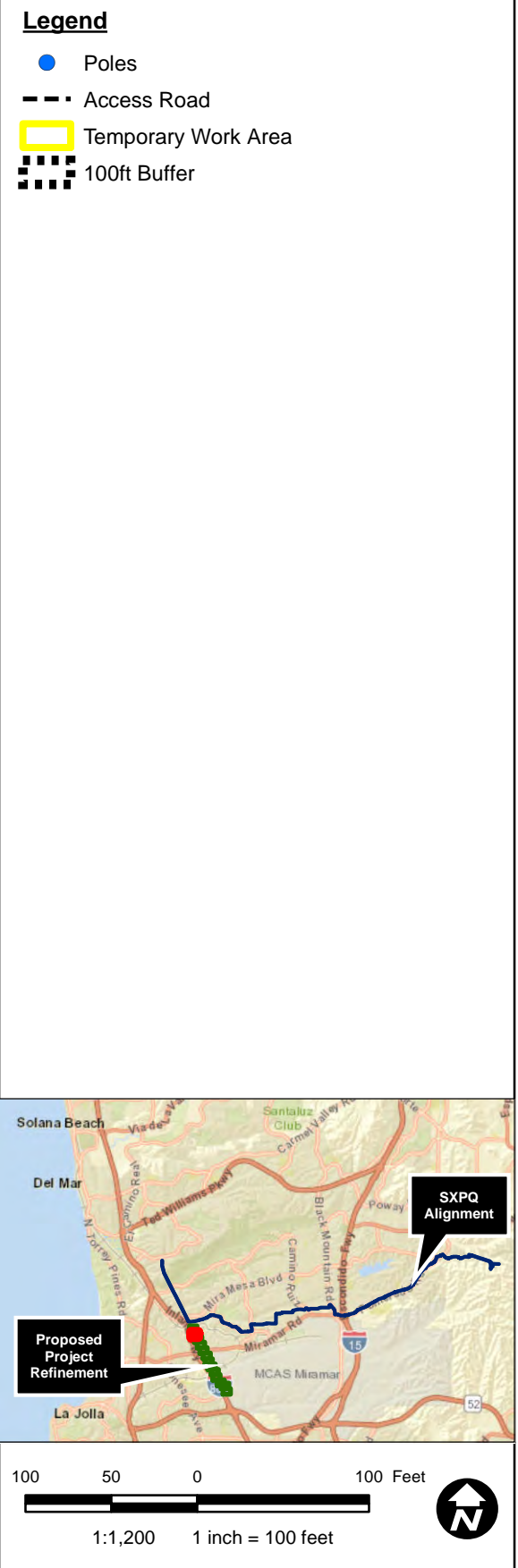
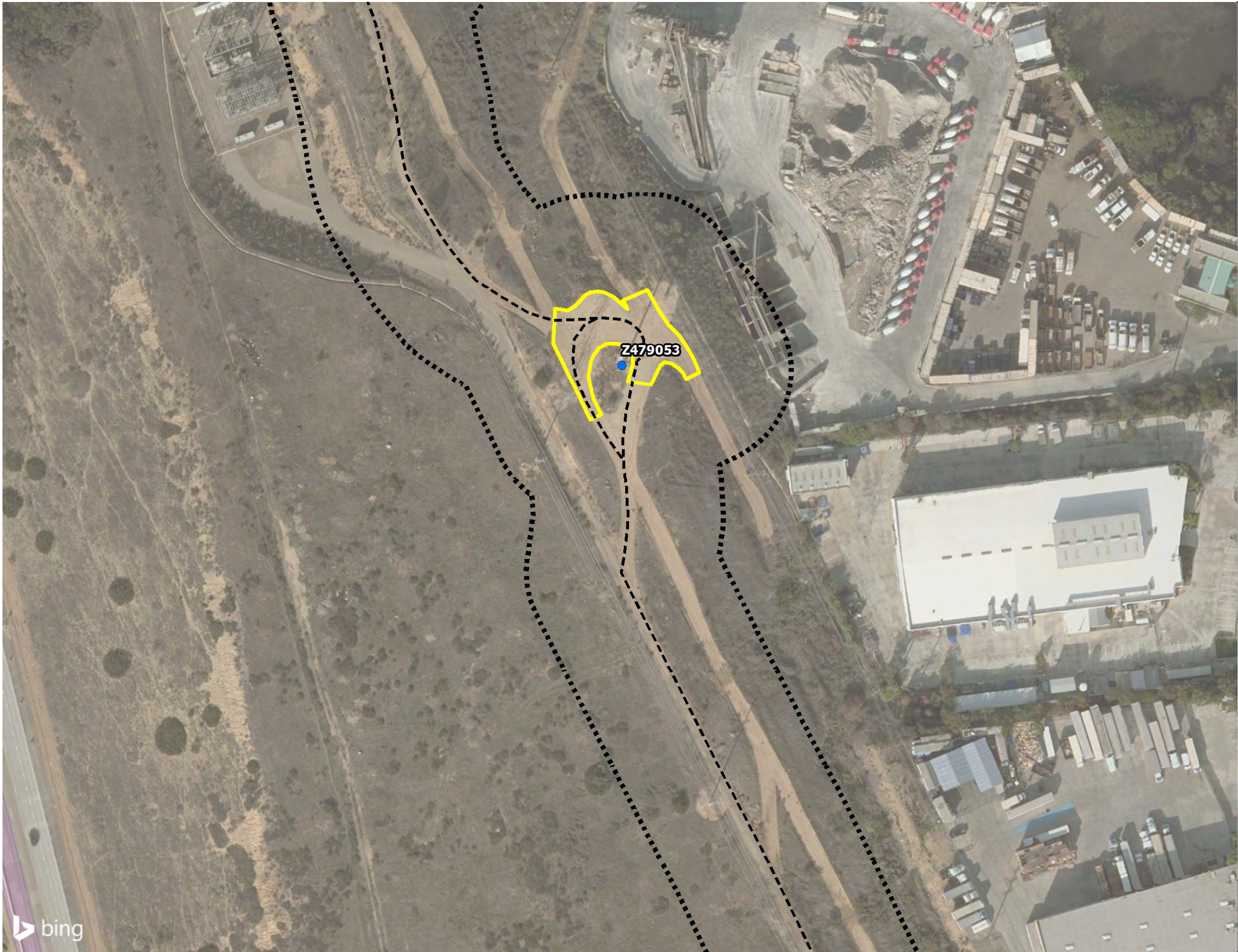
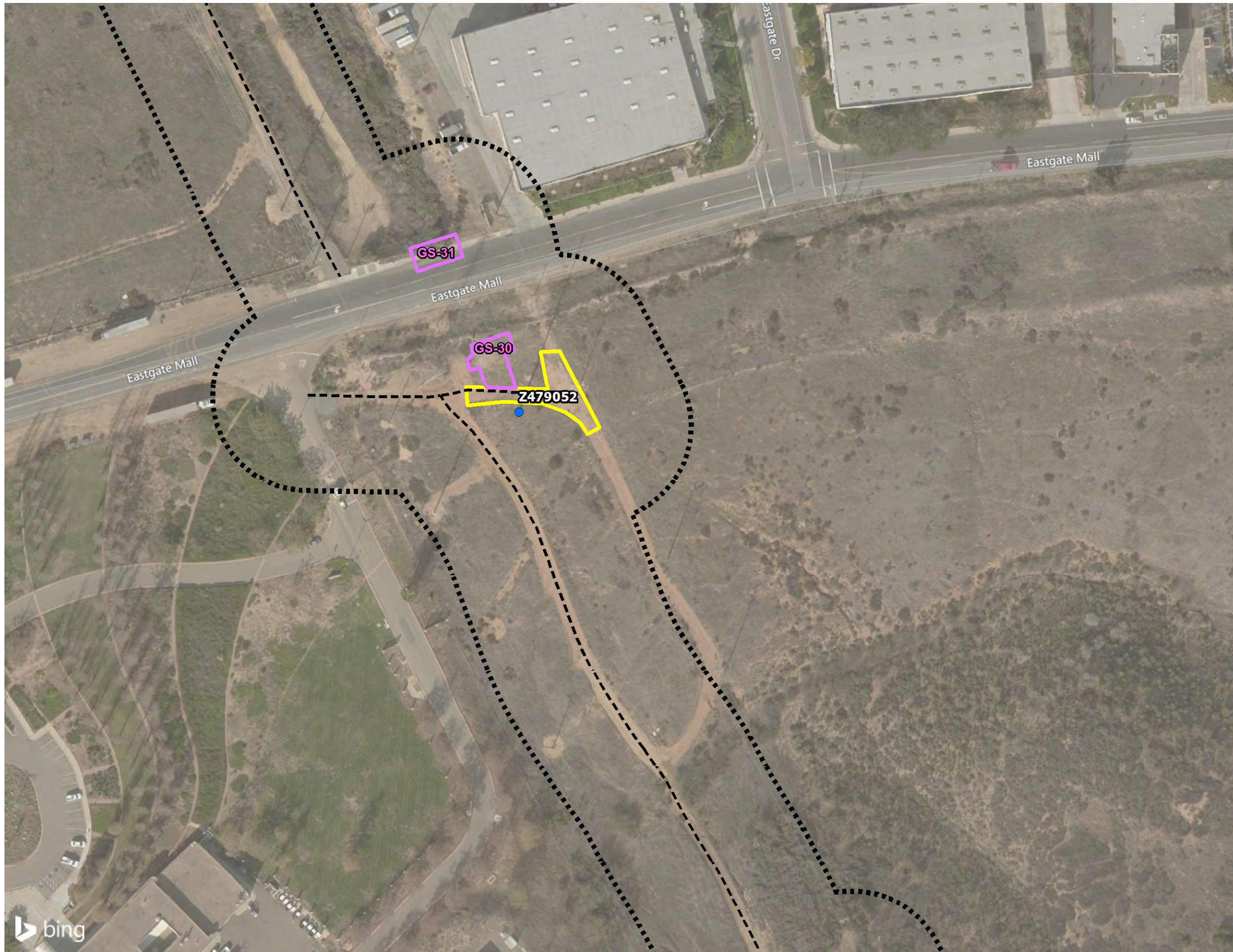


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 2



Legend

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

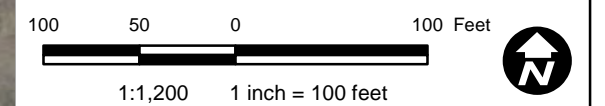
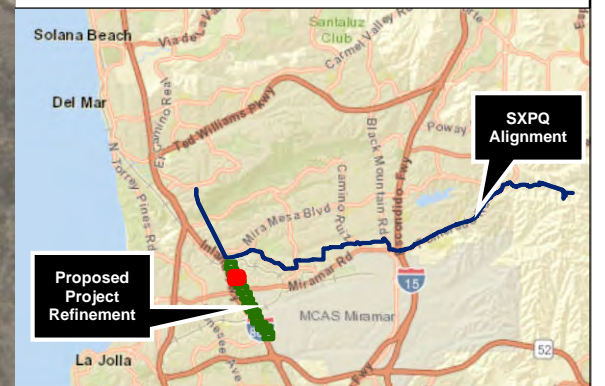
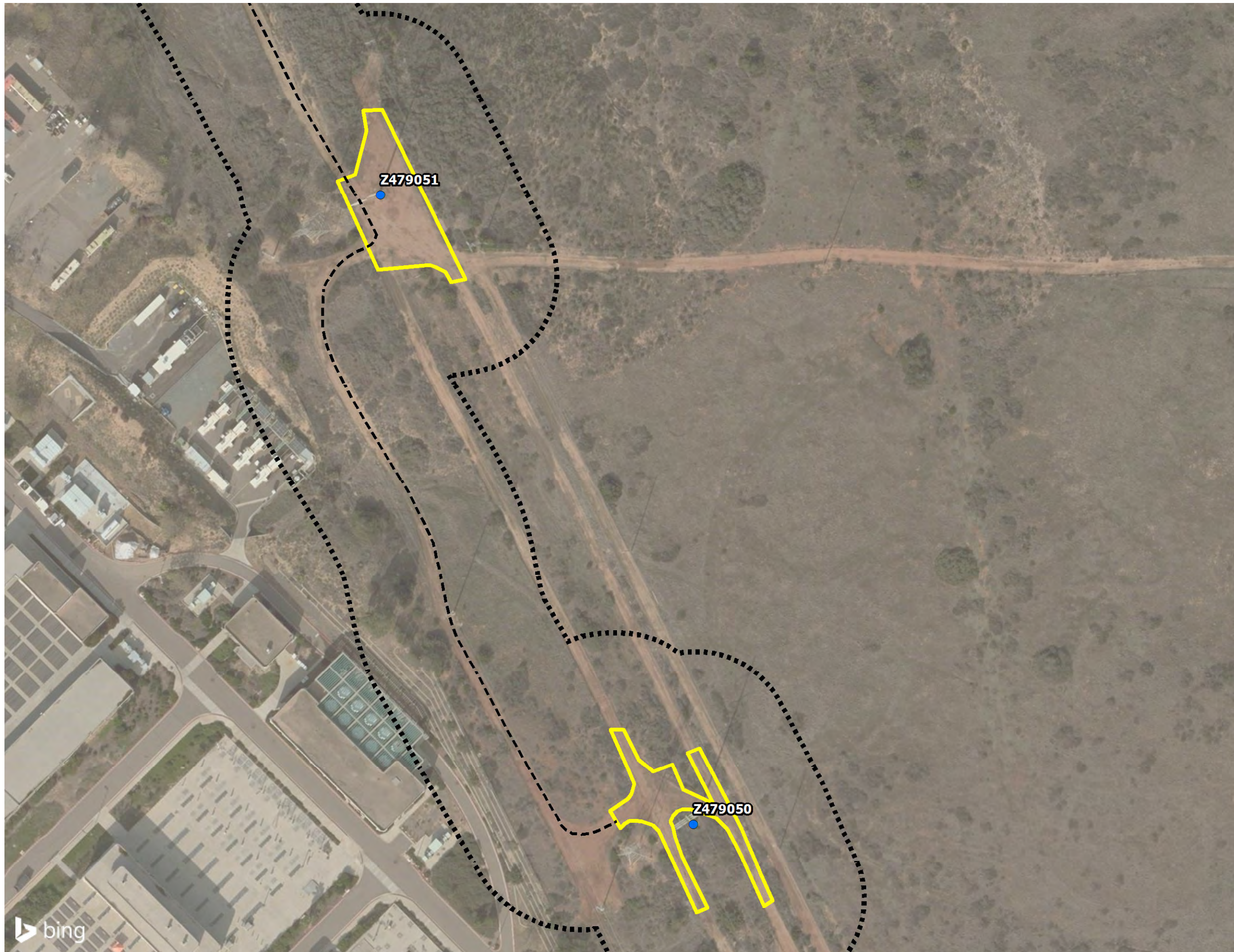


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 3



Legend

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

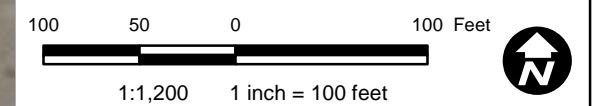
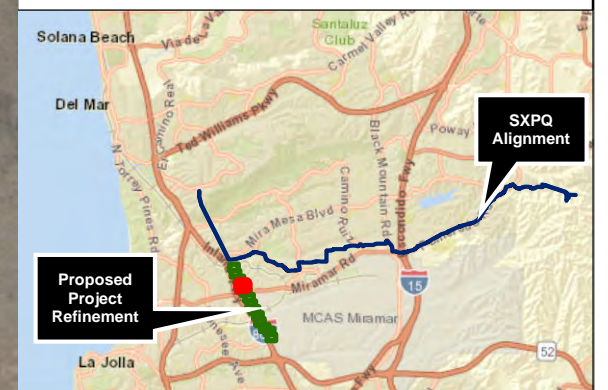
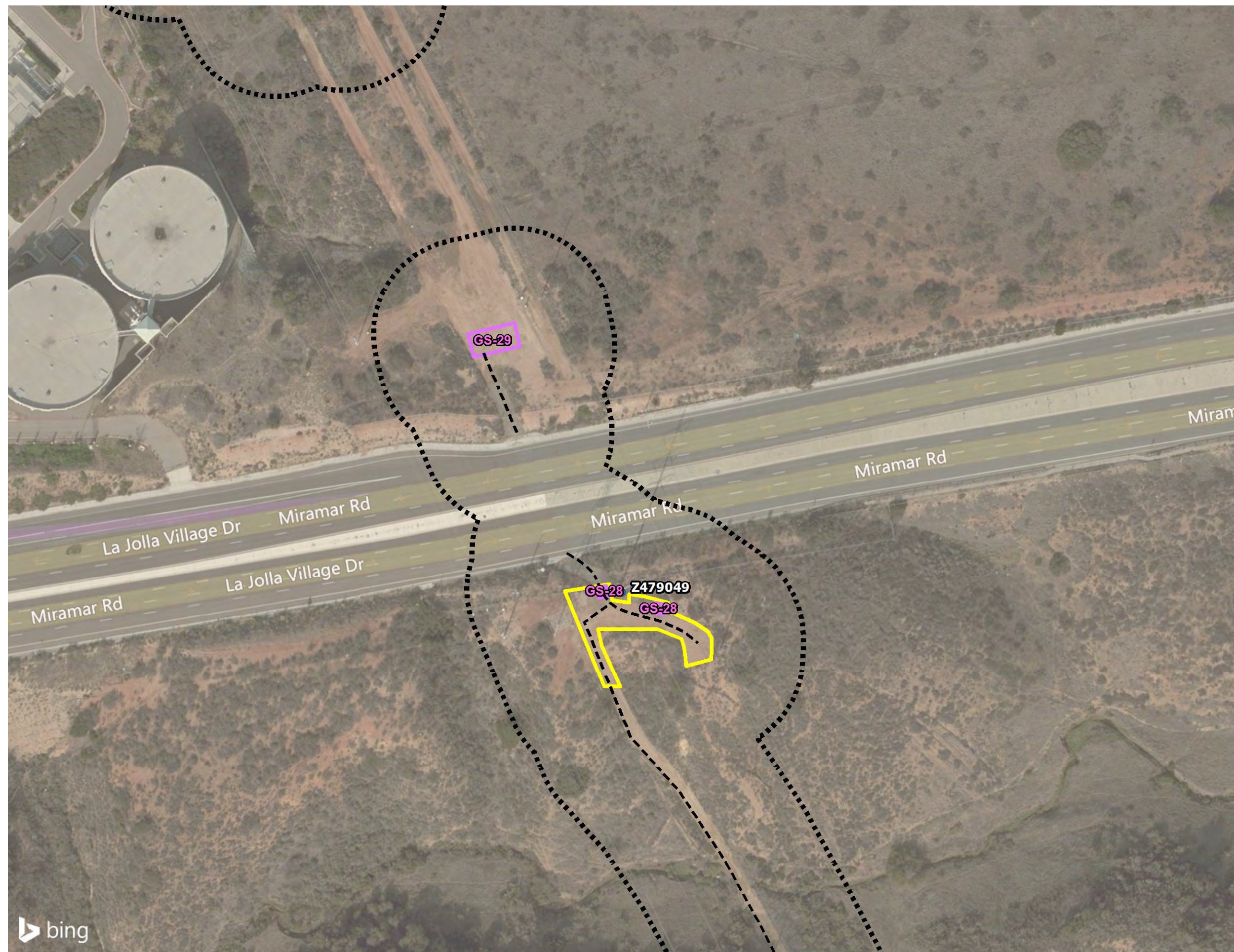


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 4



Legend

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

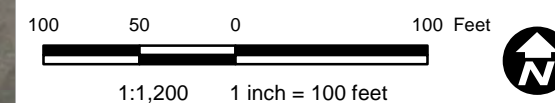
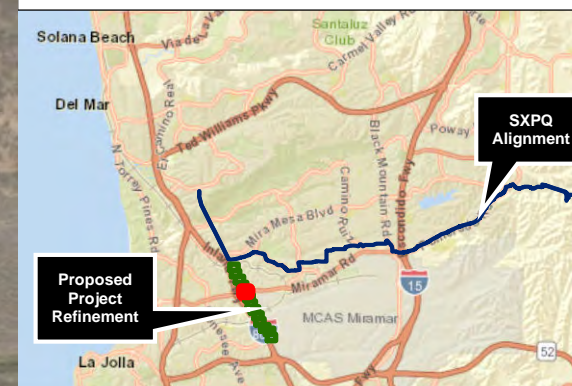
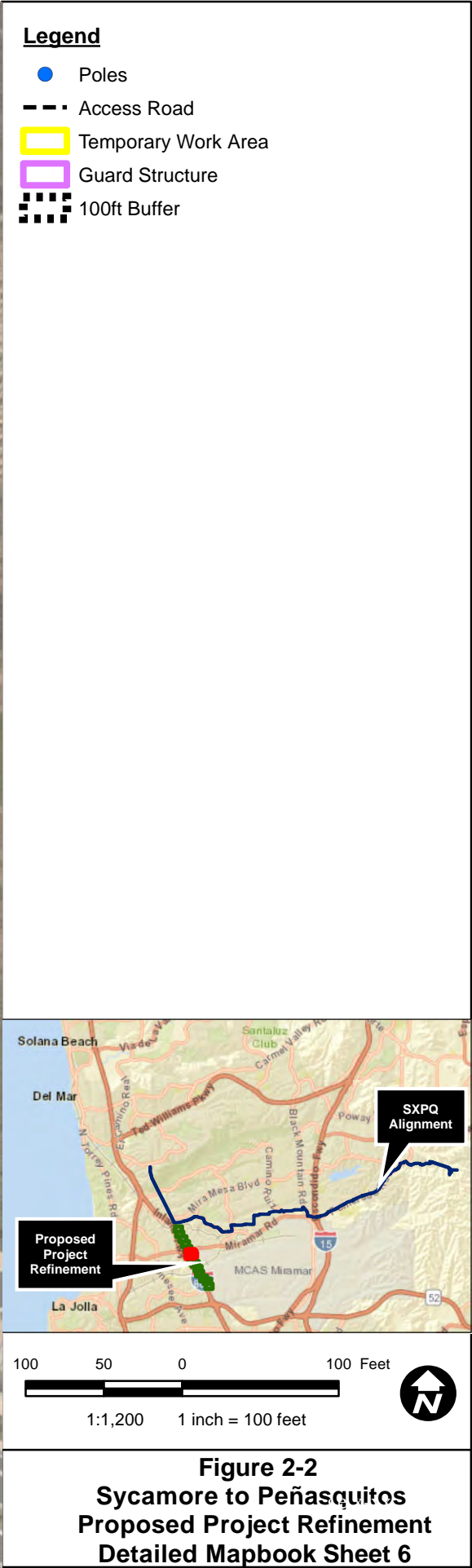
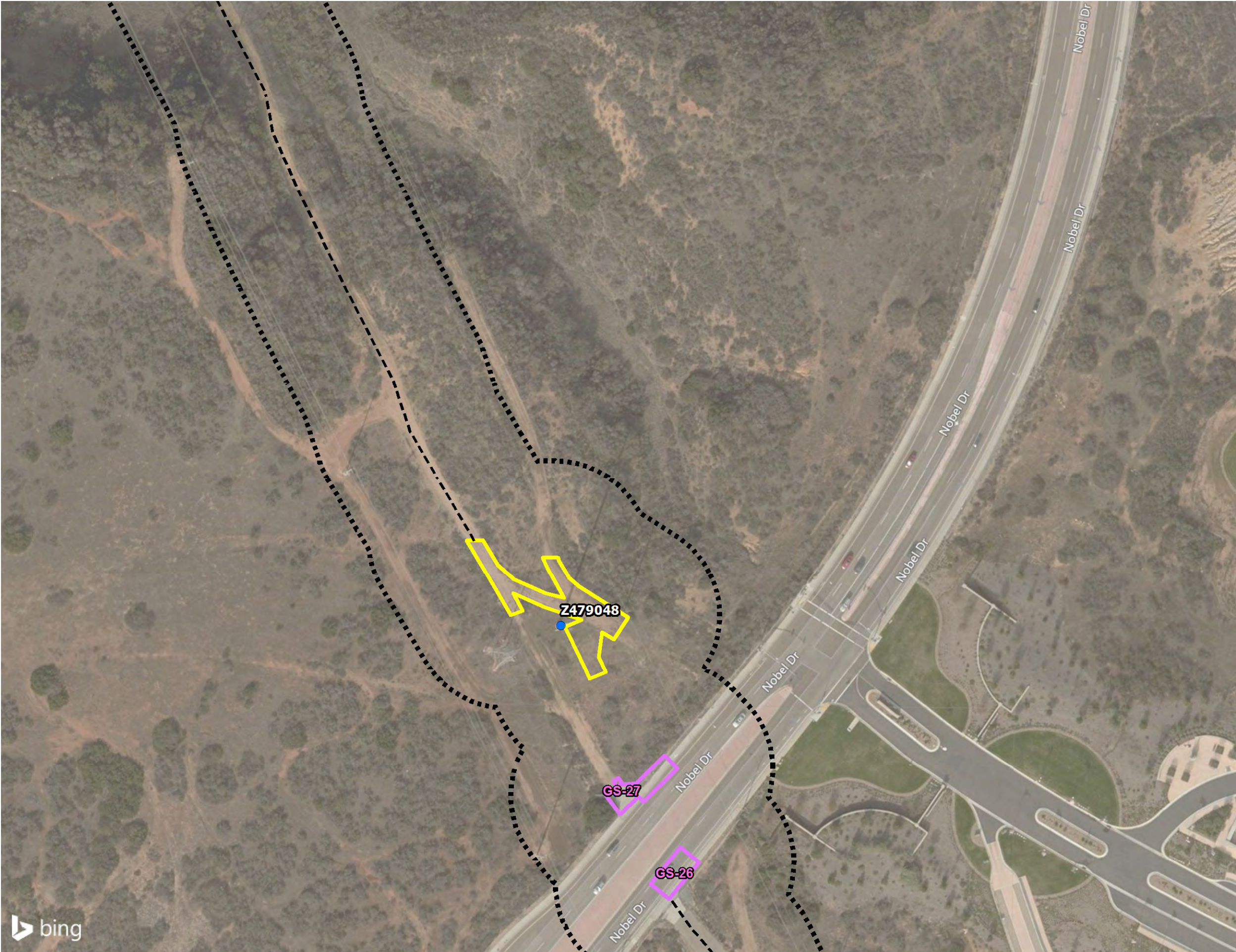
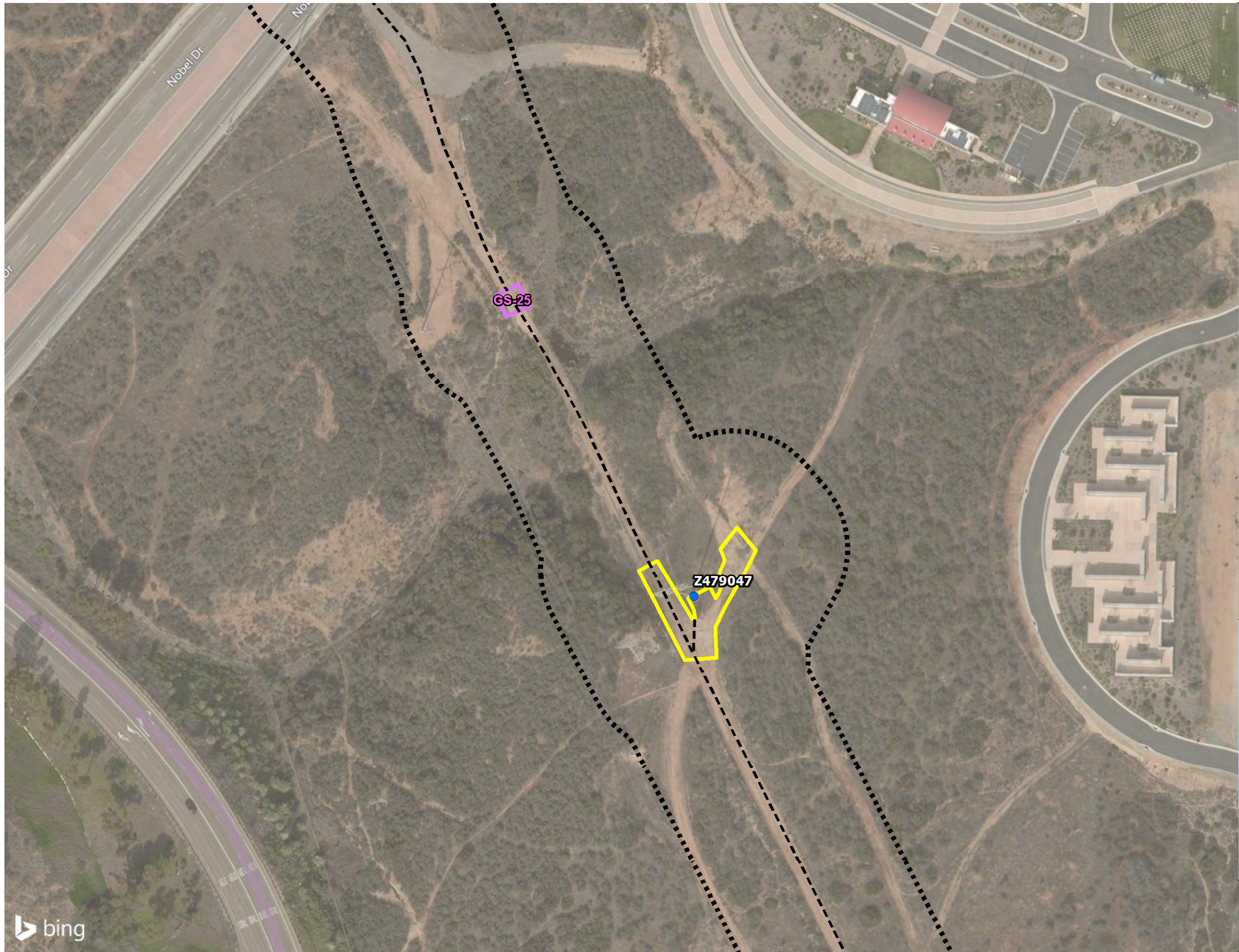


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 5





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

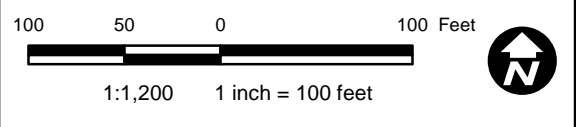
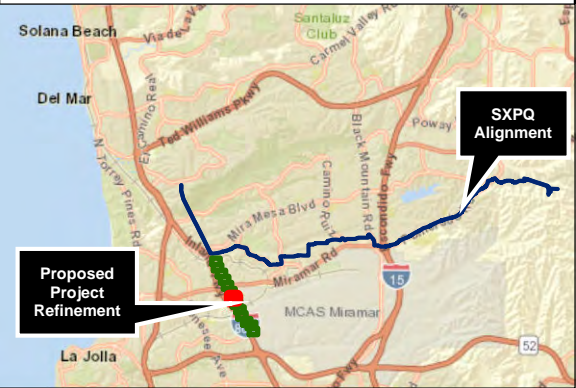
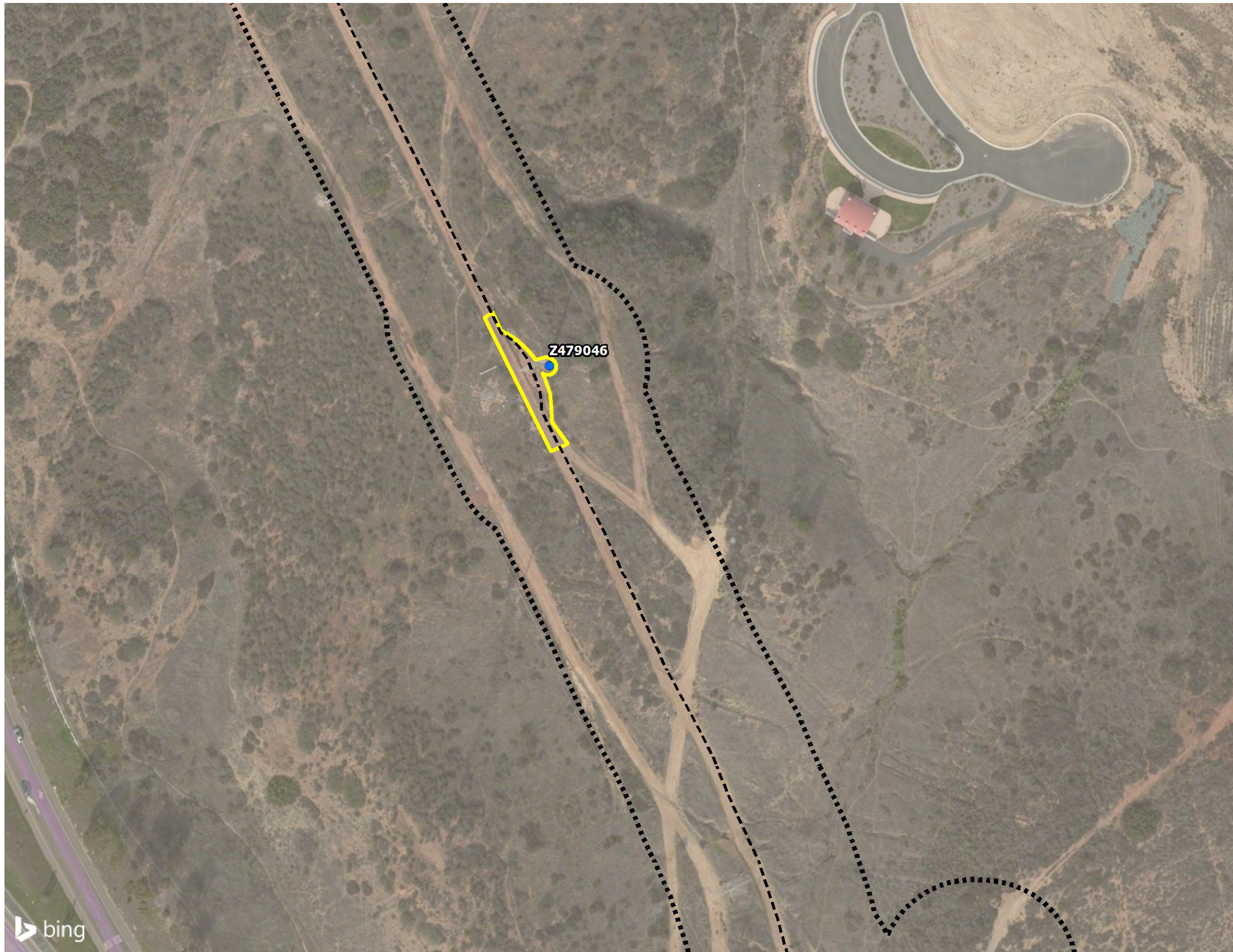


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 7



Legend

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

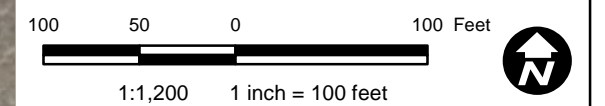
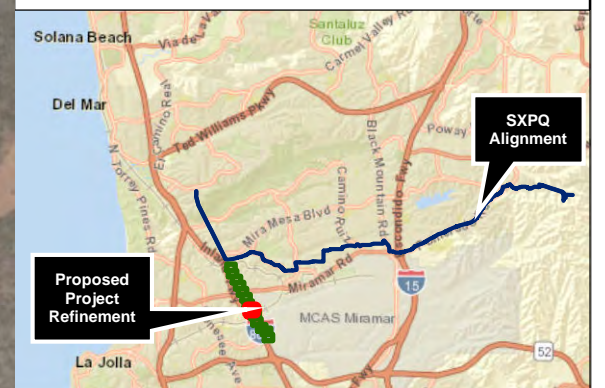
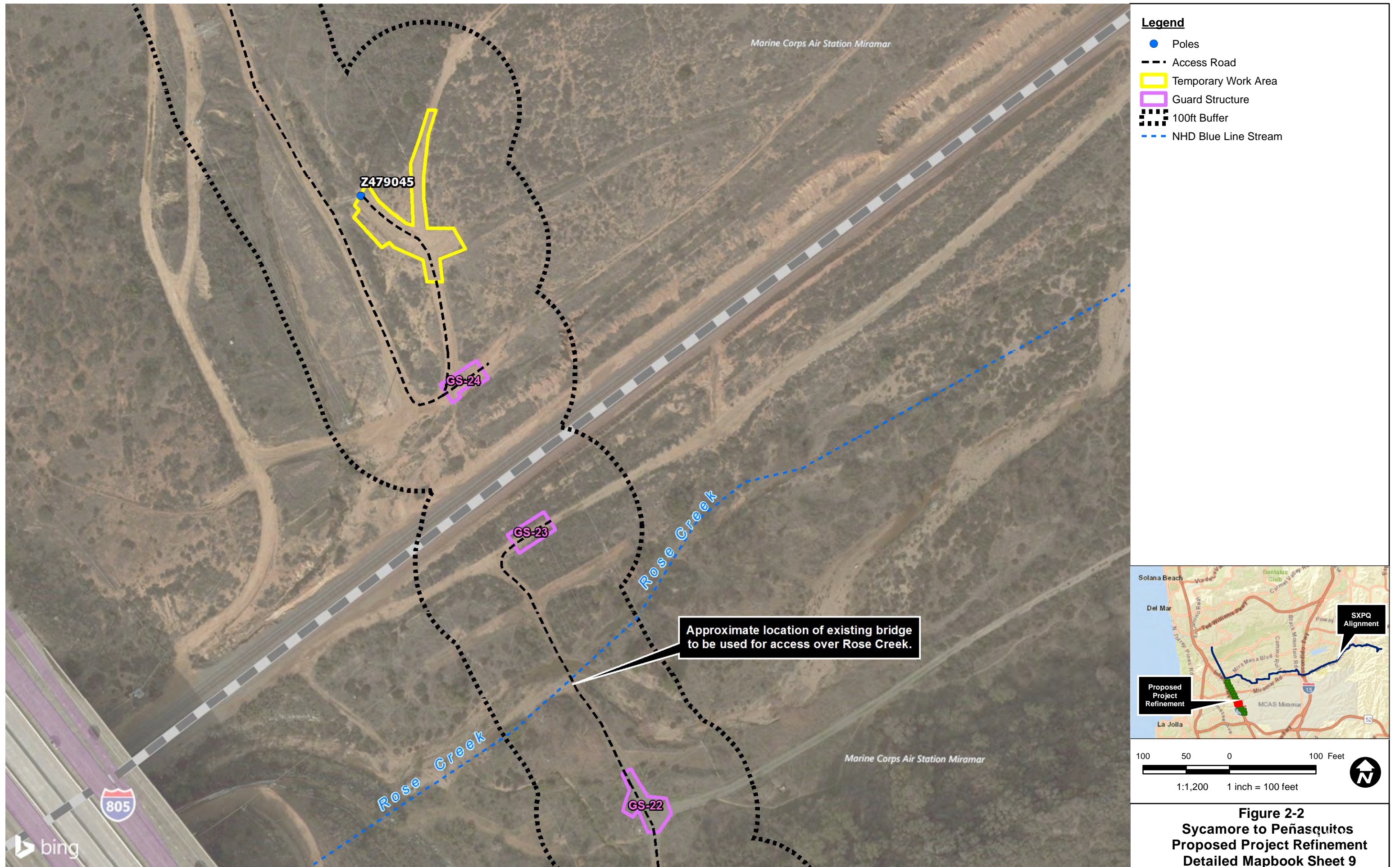
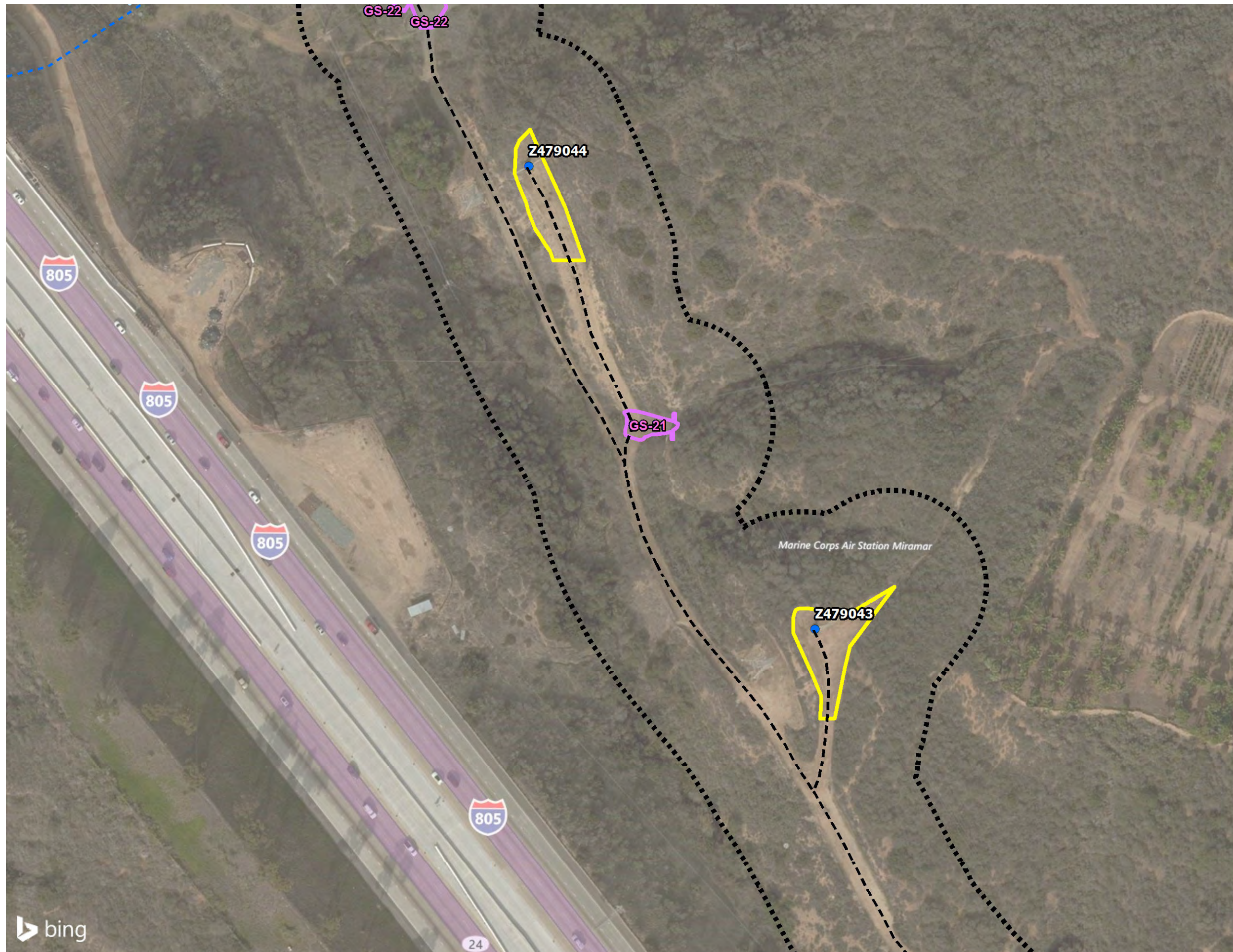
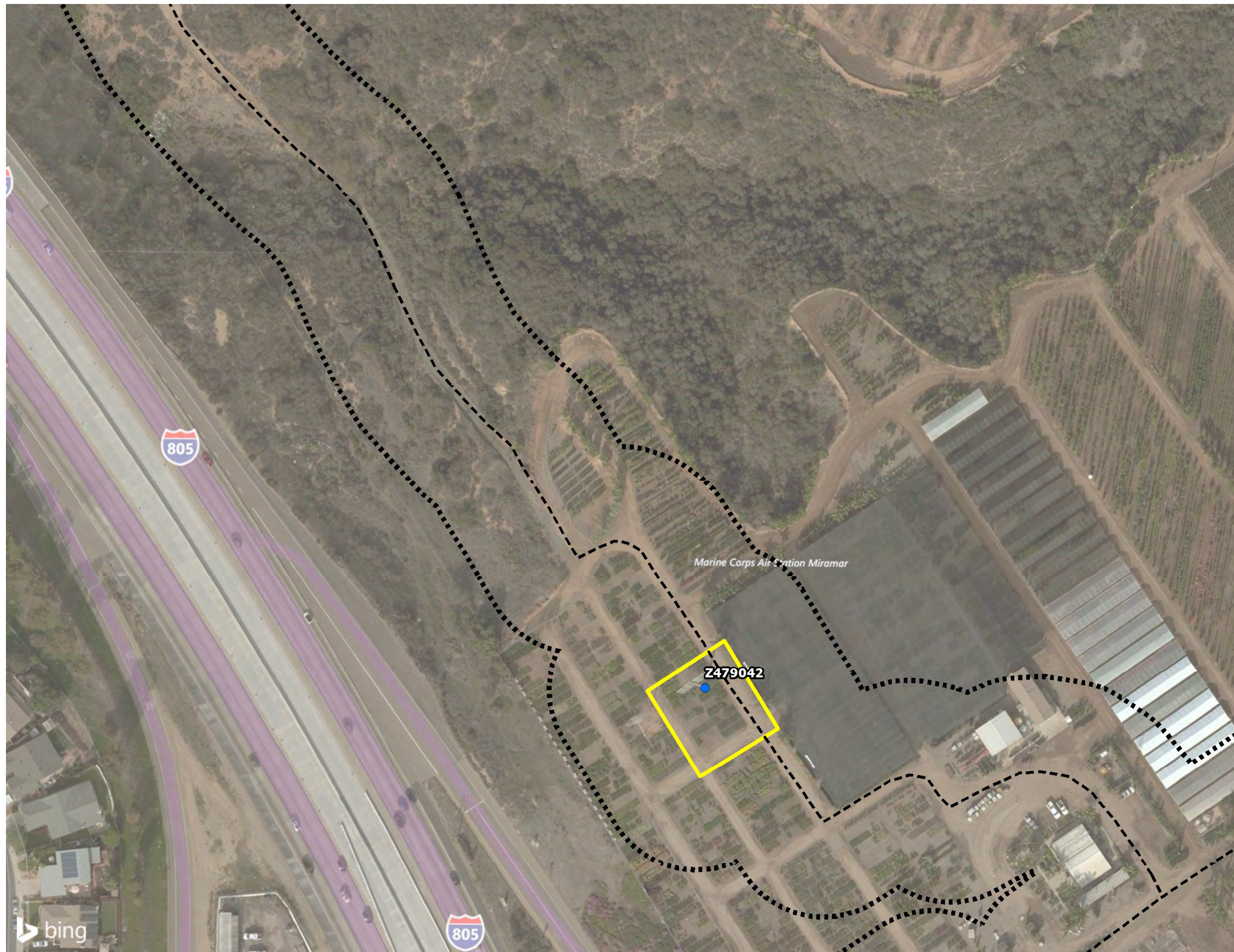


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 8







Legend

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

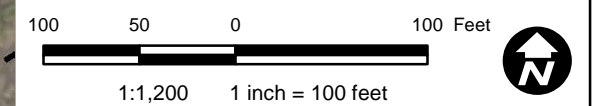
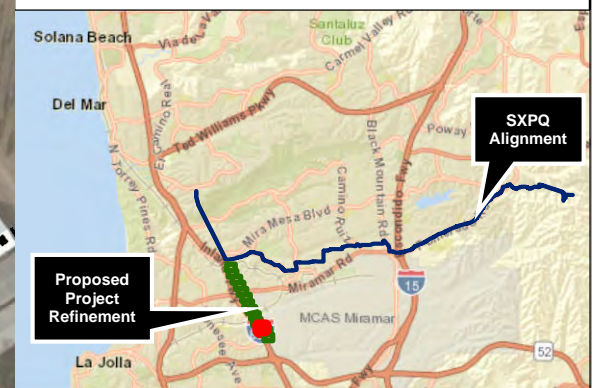
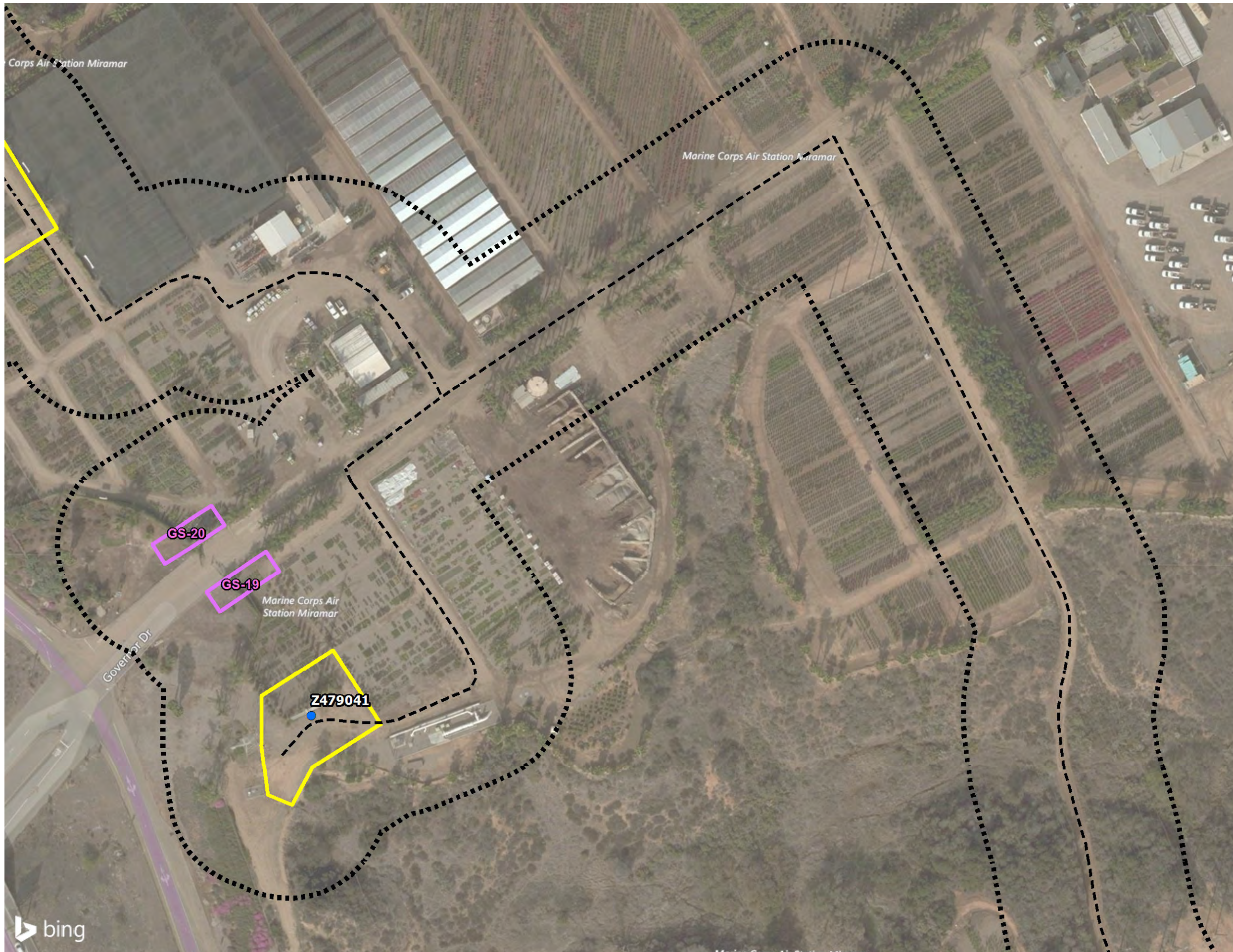


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 11



Legend

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

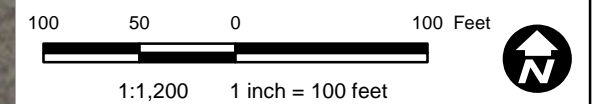
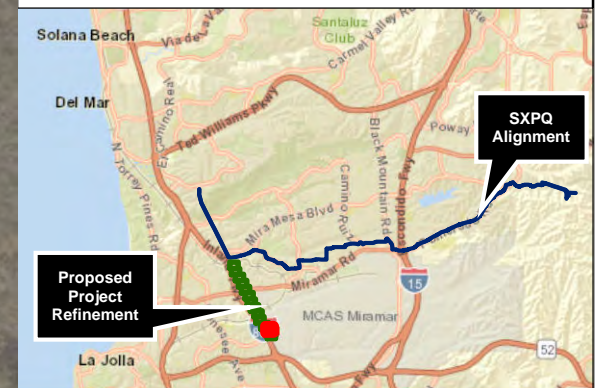
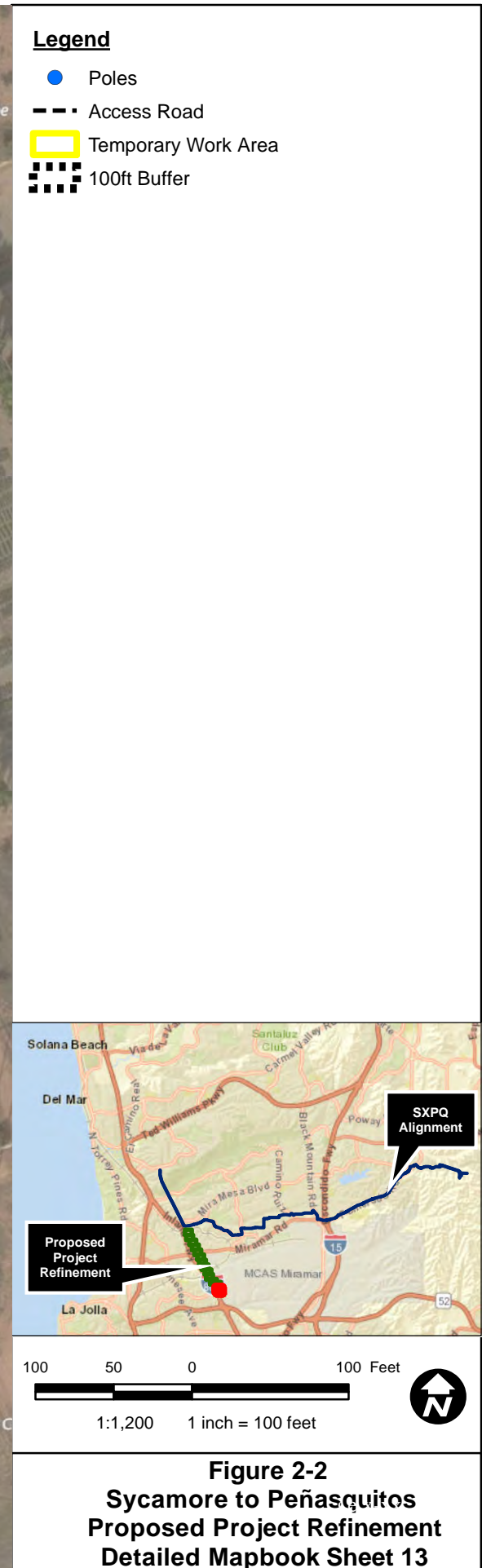


Figure 2-2
Sycamore to Peñasquitos
Proposed Project Refinement
Detailed Mapbook Sheet 12



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Table 2.4-1: Pole Access Sites

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

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

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

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

2.4.1 Guard Structures

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

Guard structures will be accomplished using one of four means:

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

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

Table 2.4-2: Guard Structures

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

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

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

2.4.2 Vegetation Clearing

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

2.4.3 Erosion and Sediment Control and Pollution Prevention during Construction

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

2.4.4 Cleanup and Post-construction Restoration

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

2.4.5 Construction Workforce, Schedule and Equipment

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

Table 2.4-3: Estimated Construction Equipment and Personnel

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

Source: SDG&E

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

Table 2.4-4: Anticipated Construction Equipment

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

Source: SDG&E

2.5 OPERATION AND MAINTENANCE

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

2.6 ANTICIPATED PERMITS AND APPROVALS

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

2.7 APPLICANT-PROPOSED MEASURES

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

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3. ENVIRONMENTAL IMPACT ASSESSMENT

This section presents an evaluation of the potential impacts associated with the Proposed Project Modification for identified environmental resource areas derived from CPUC requirements, Public Utilities Code Section 1001-1013, and CEQA requirements, Public Resources Code (PRC) Section 21080 et seq. Potential impacts are identified and evaluated based upon the significance criteria outlined in Appendix G of the *CEQA Guidelines*, and the FEIR. As this EA and the previously approved FEIR were prepared in advance of the CEQA Guidelines updates that became effective December 28, 2018, the EA generally relies on the 2018 CEQA Guidelines and FEIR for determining significance. However, sections related to wildfire, energy, and tribal resources have been added to address those December 2018 changes. Changes to other resources areas were also reviewed as part of this EA and are summarized in Table format in Appendix IV. The review indicates that none of the changes to the checklist would result in a new significant impact that was not analyzed in the FEIR. . Unless otherwise stated, information regarding the environmental resources included in this assessment were obtained from the Project's FEIR (CPUC 2016).

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

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

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3.1 AESTHETICS

3.1.1 Existing Conditions

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

3.1.1.1 Regional and Local Landscape Setting

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

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

3.1.1.2 Proposed Project Viewshed

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

3.1.2 Potential Impacts

3.1.2.1 Significance Criteria

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

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

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

Less than Significant

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

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

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

No Impact

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

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Existing Conditions

3.2.1.1 Agricultural and Forestry Setting

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

FMMP Mapped Farmland

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

Active Agricultural Operations, Zoning, and Forest Land

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

3.2.2 Potential Impacts

3.2.2.1 Significance Criteria

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

No Impact

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

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

No Impact

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

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

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

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

No Impact

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

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

No Impact

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

3.3 AIR QUALITY

3.3.1 Existing Conditions

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

3.3.2 Potential Impacts

3.3.2.1 Significance Criteria

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

Significant and Unavoidable

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

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

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

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

Significant and Unavoidable

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

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

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

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

Significant and Unavoidable

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

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

Less than Significant

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

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

Less than Significant

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

3.4 BIOLOGICAL RESOURCES

3.4.1 Existing Conditions

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

Literature Review

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

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

Field Surveys

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

Special-Status Plant and Wildlife Surveys

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

Table 3.4-1: Biological Surveys

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

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

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

Wetland and Delineation of Jurisdictional Waters

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

All work areas are located outside of jurisdictional features.

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

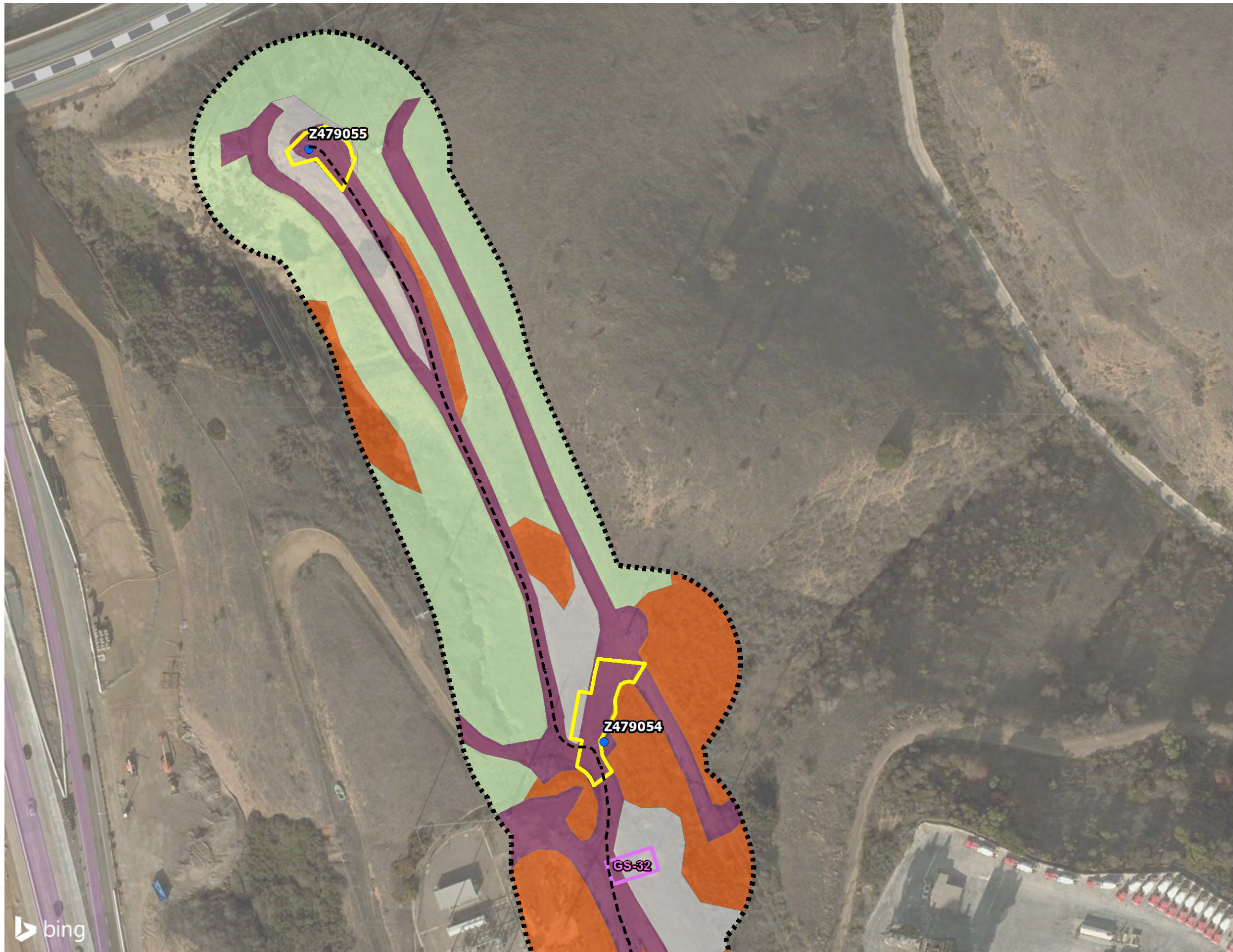
3.4.1.1 Vegetation Communities

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

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

3.4.1.2 Critical Habitat

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

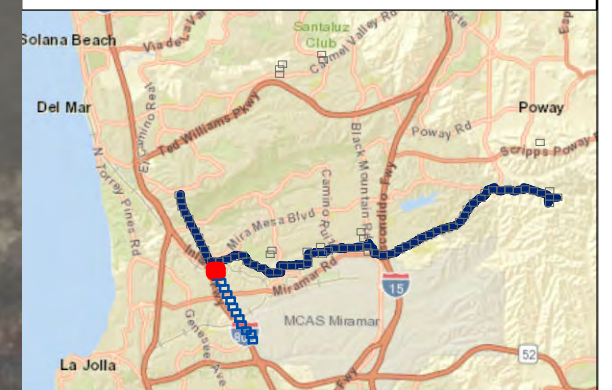


Legend

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

Vegetation Communities

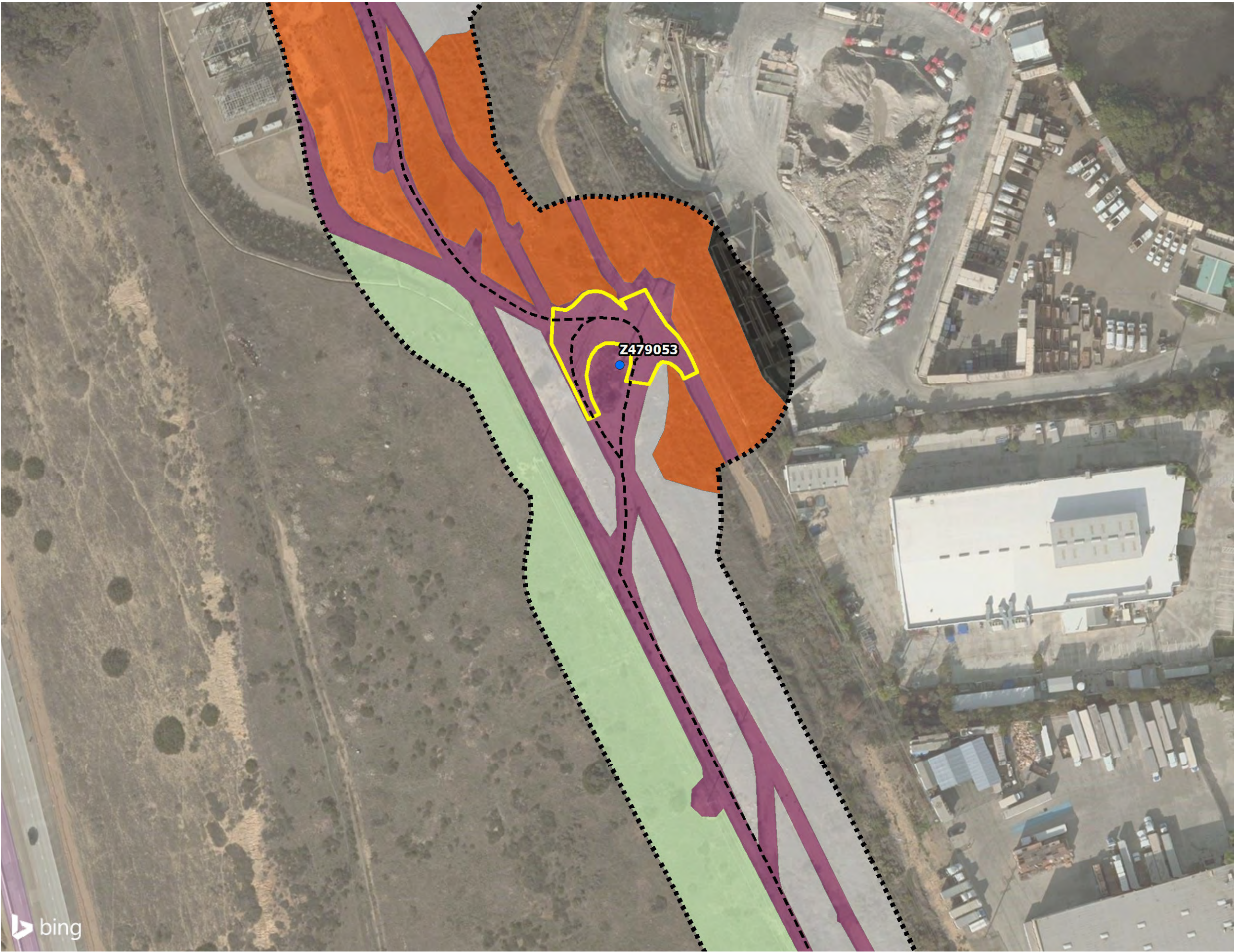
- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland



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



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



Legend

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

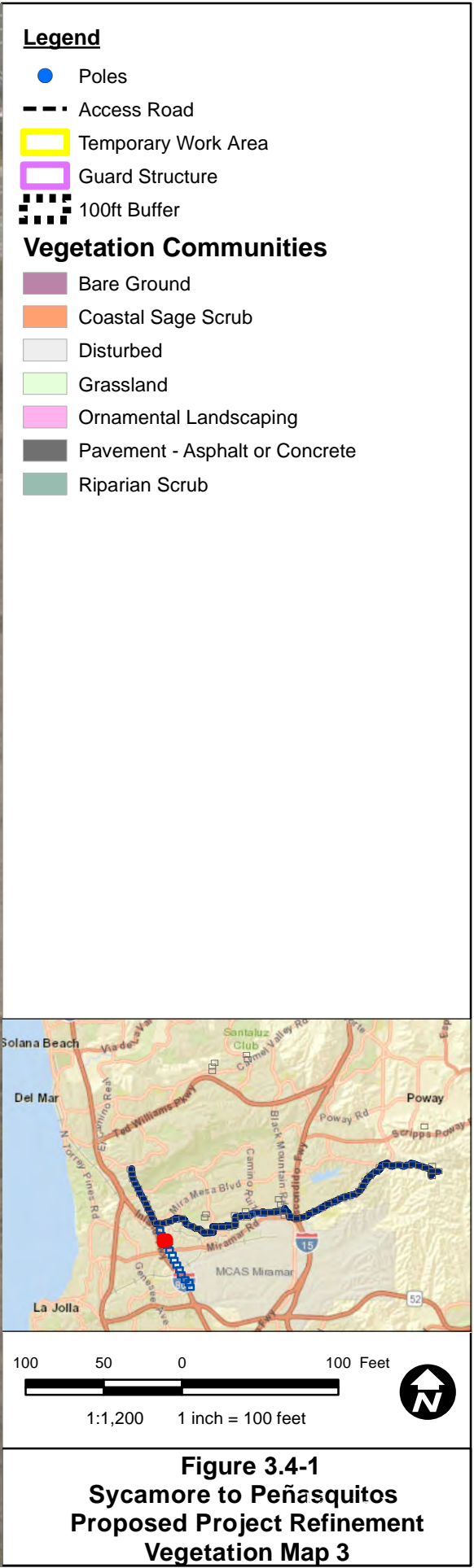
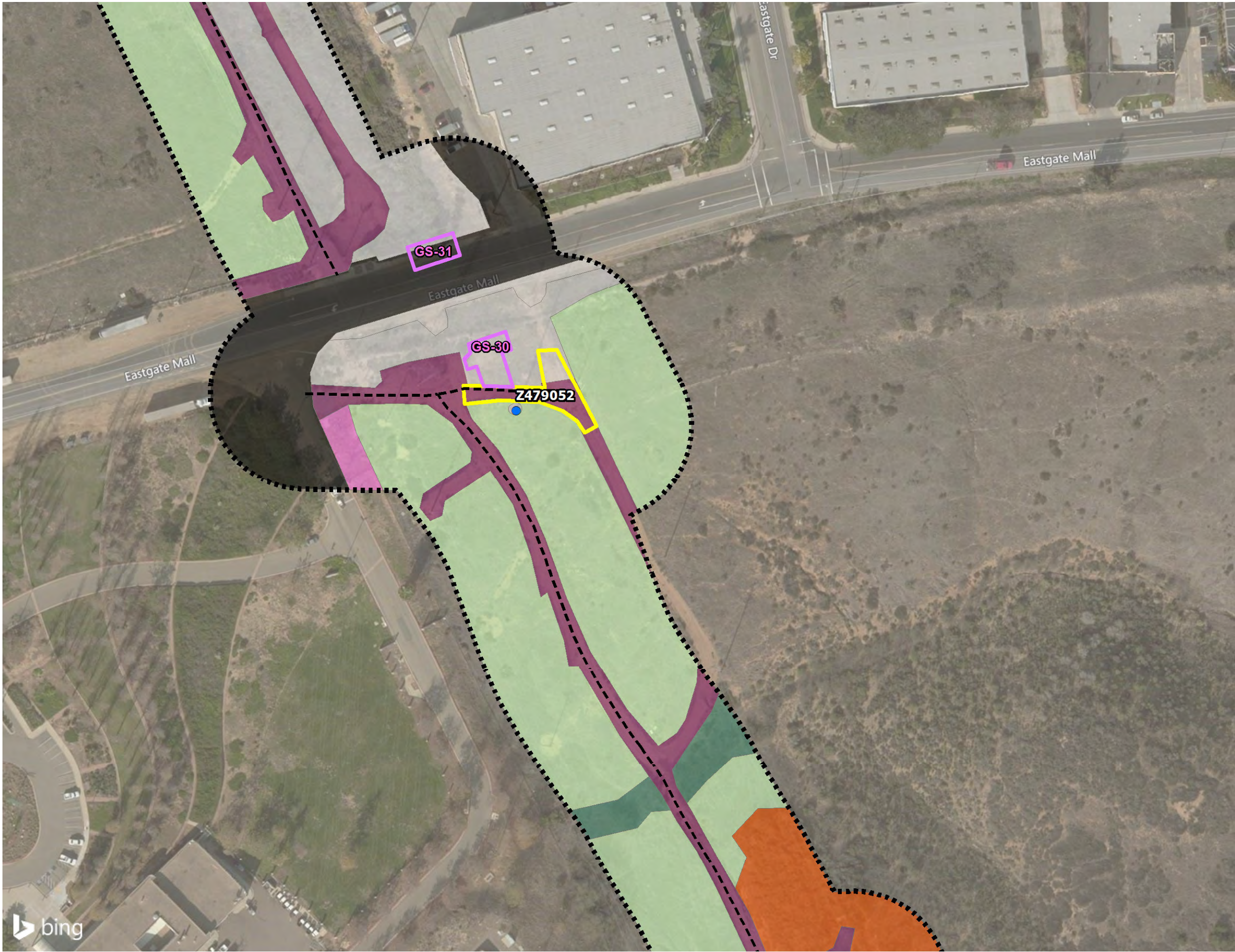
Vegetation Communities

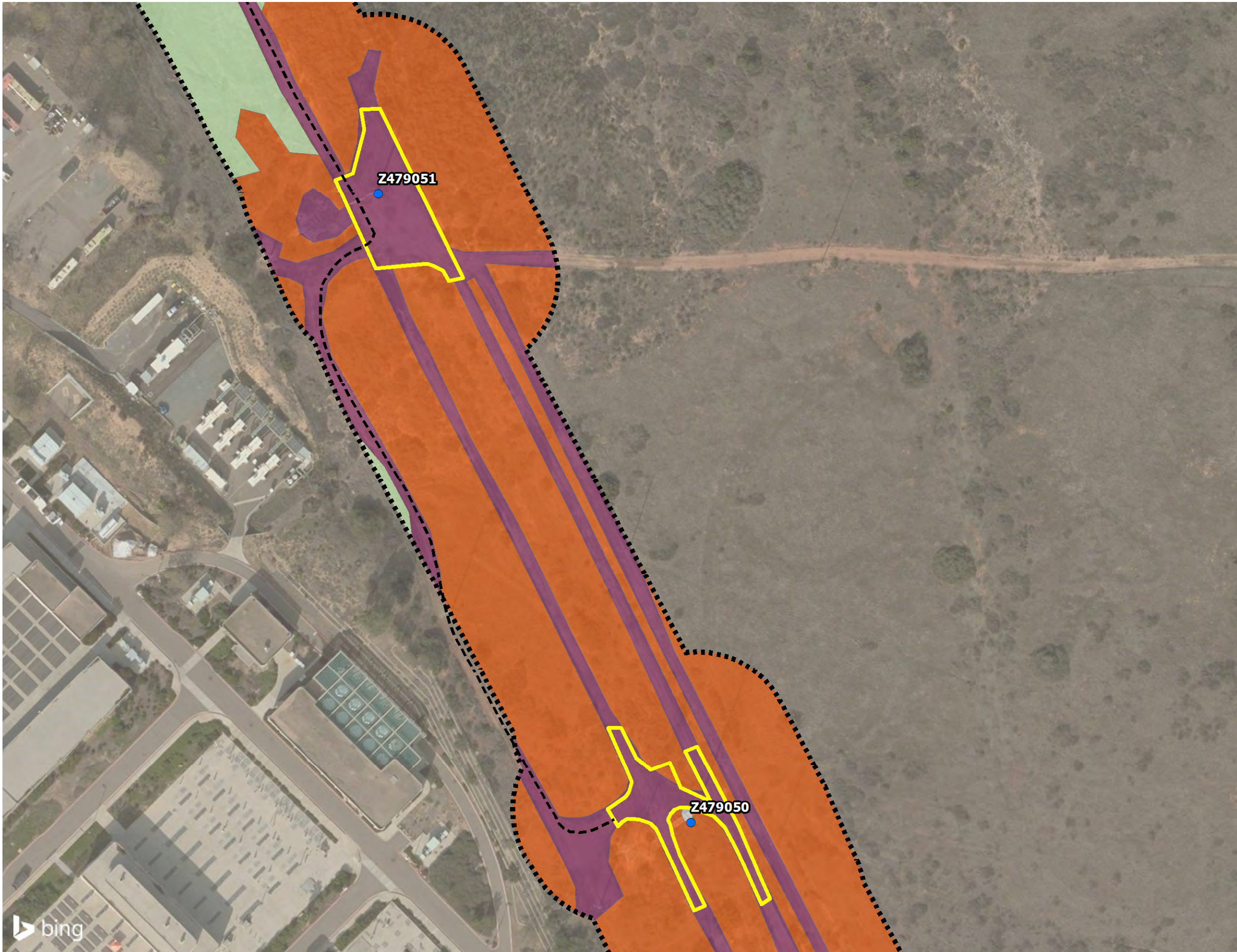
- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland
- Pavement - Asphalt or Concrete

100 50 0 100 Feet

1:1,200 1 inch = 100 feet

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





Legend

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

Vegetation Communities

- Bare Ground
- Coastal Sage Scrub
- Disturbed
- Grassland

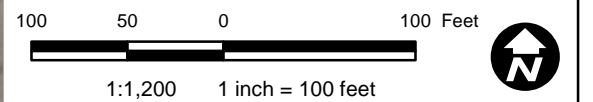
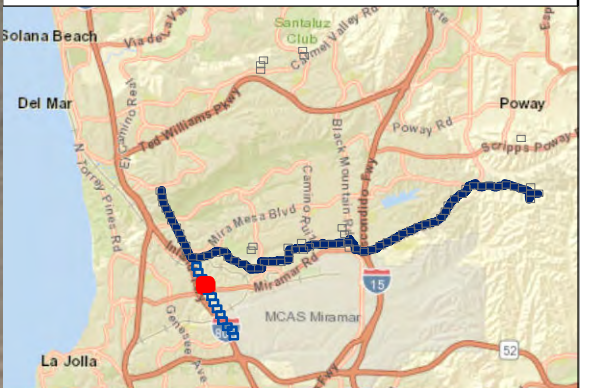
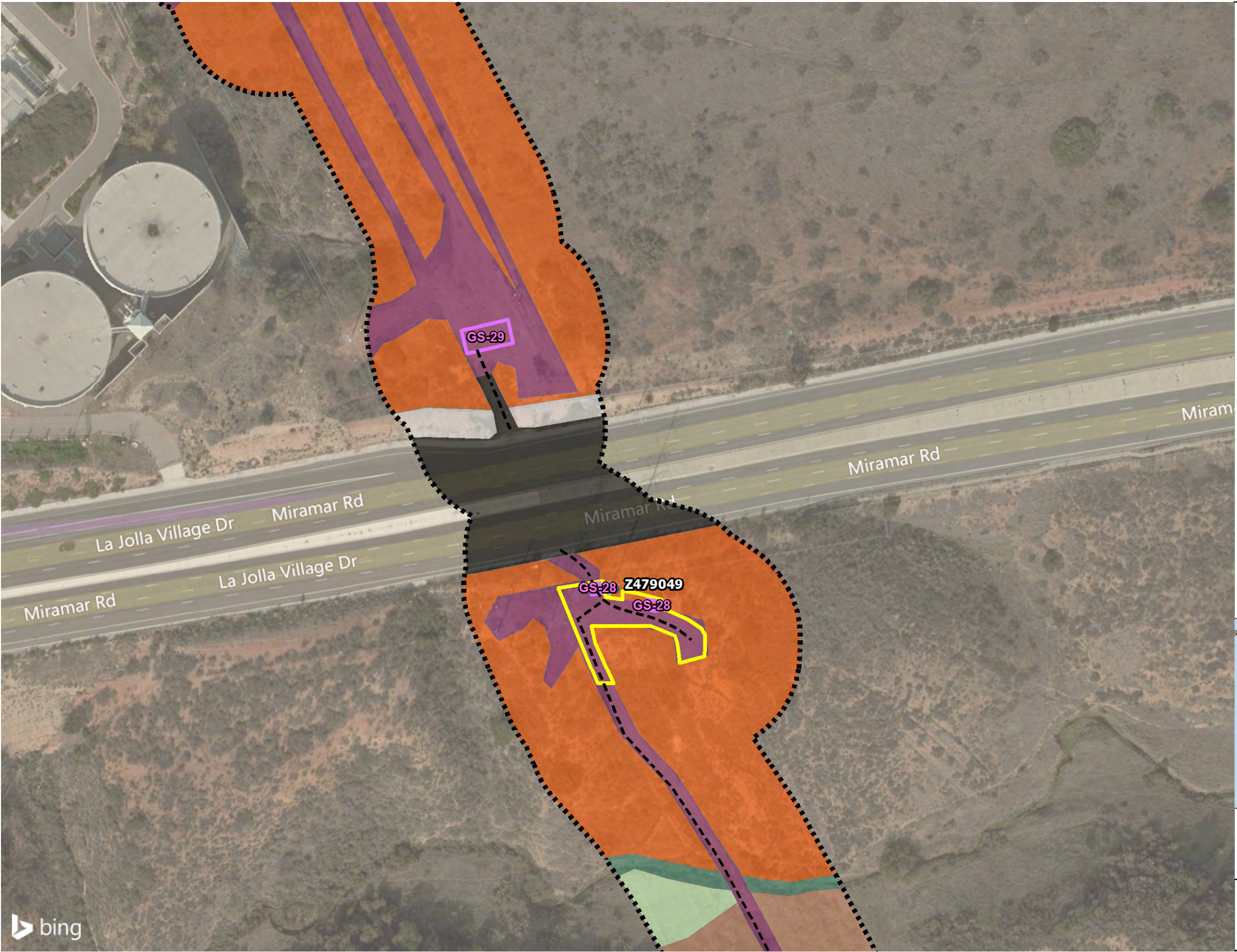


Figure 3.4-1
Sycamore to Peñasquitos
Proposed Project Refinement
Vegetation Map 4



Legend

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

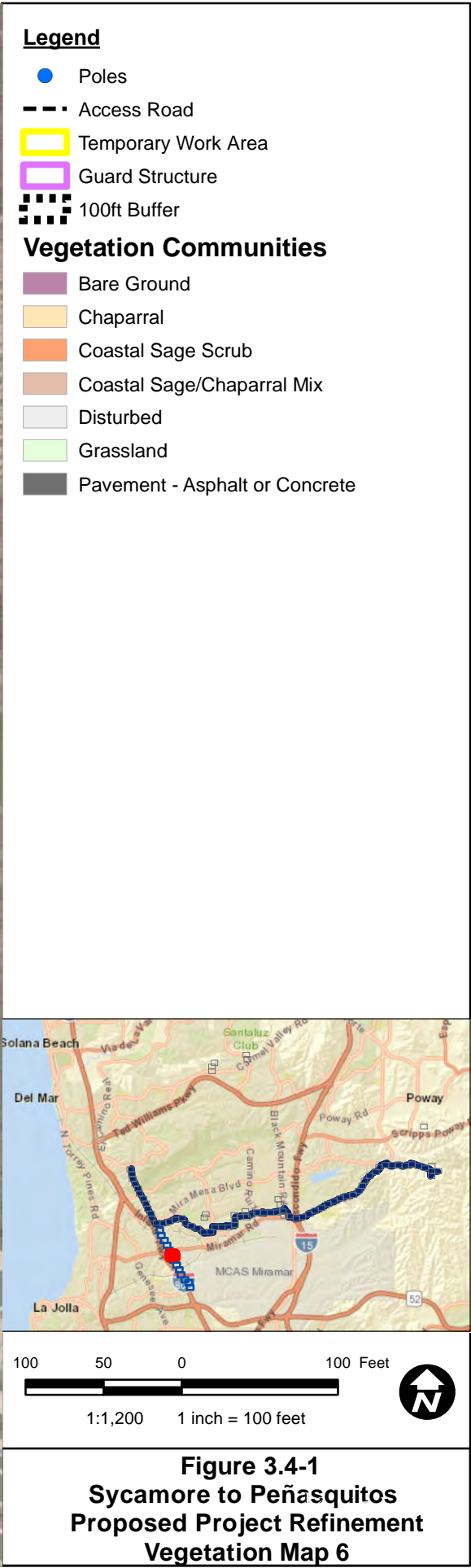
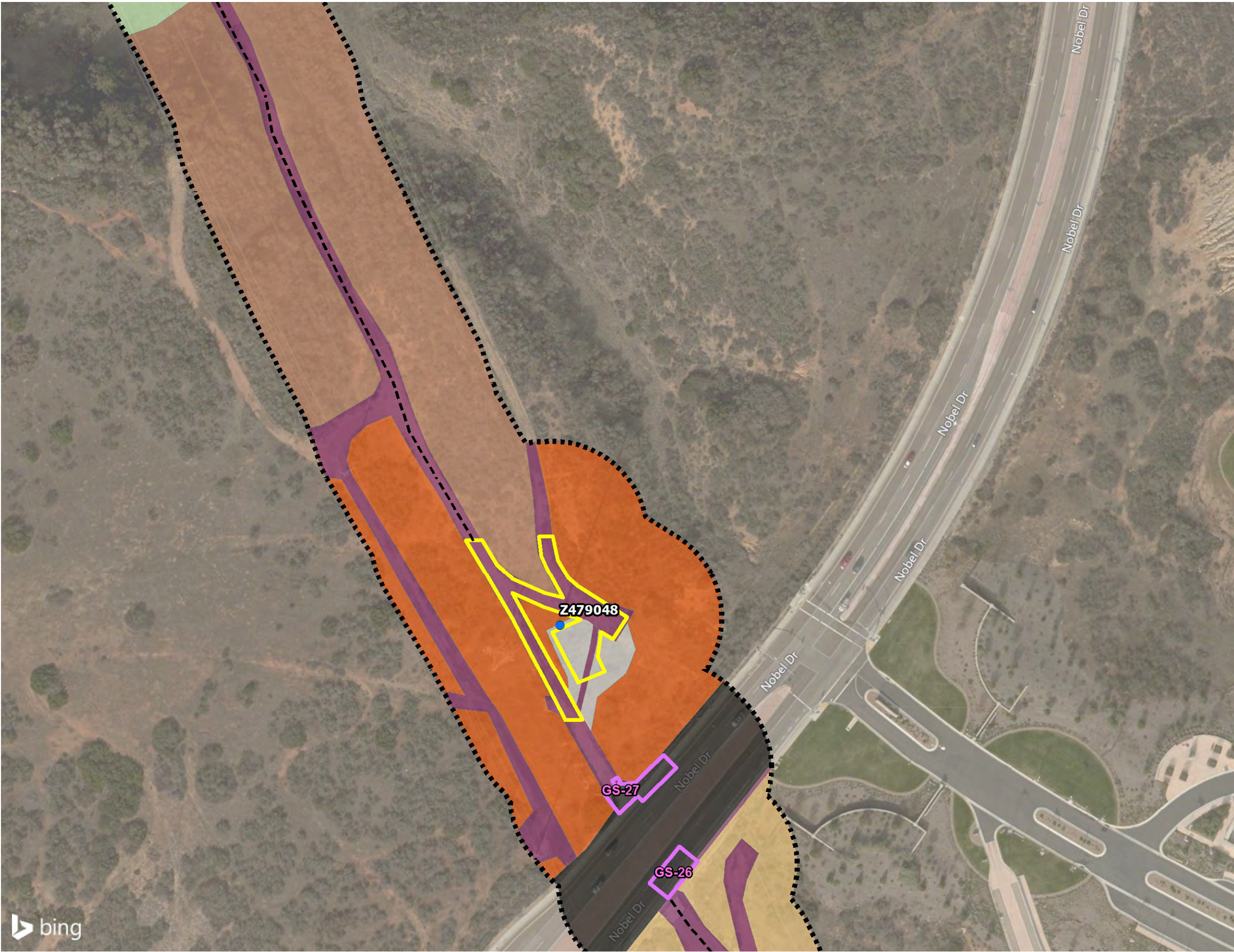
Vegetation Communities

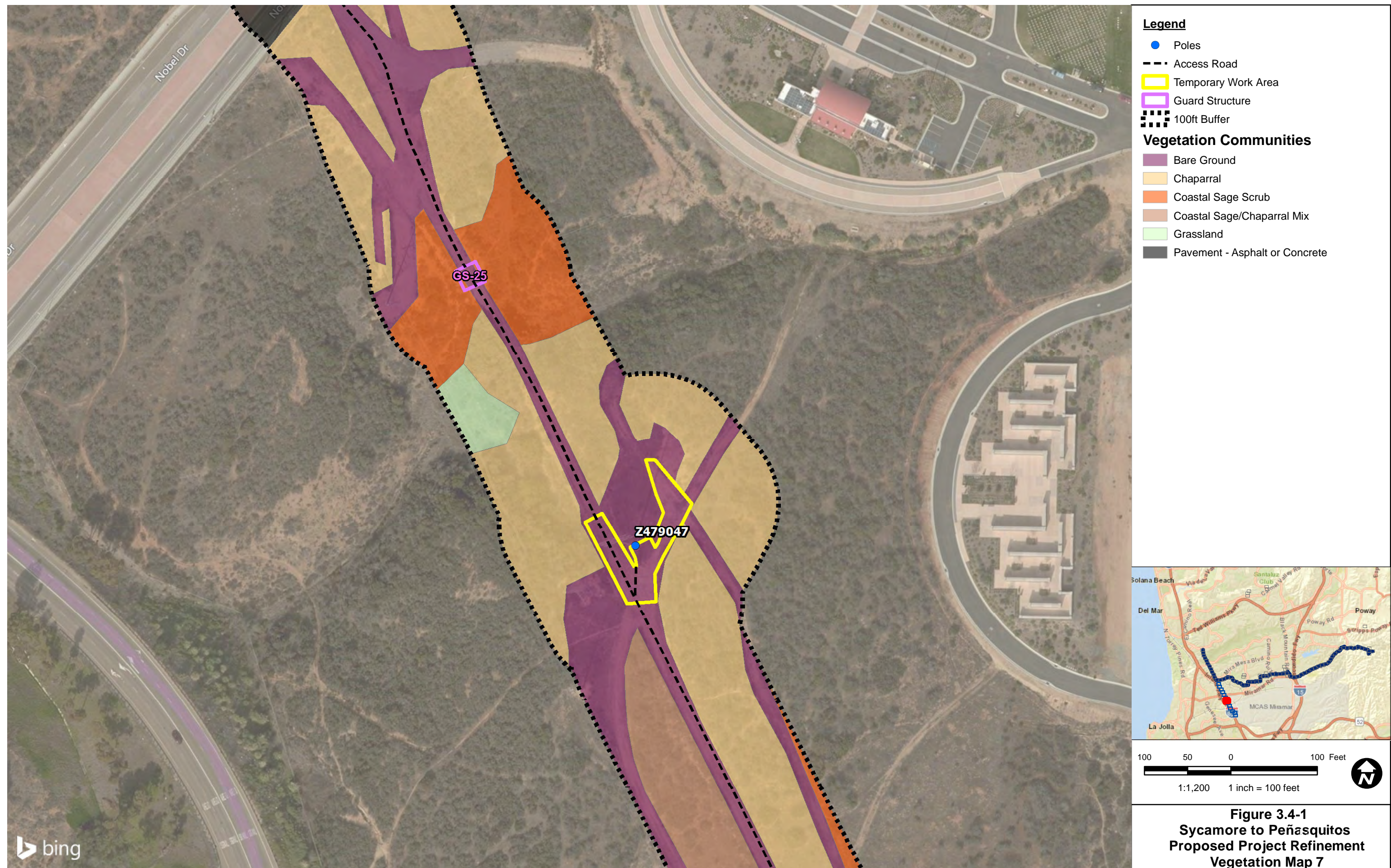
- Bare Ground
- Coastal Sage Scrub
- Coastal Sage/Chaparral Mix
- Disturbed
- Grassland
- Pavement - Asphalt or Concrete
- Riparian Scrub

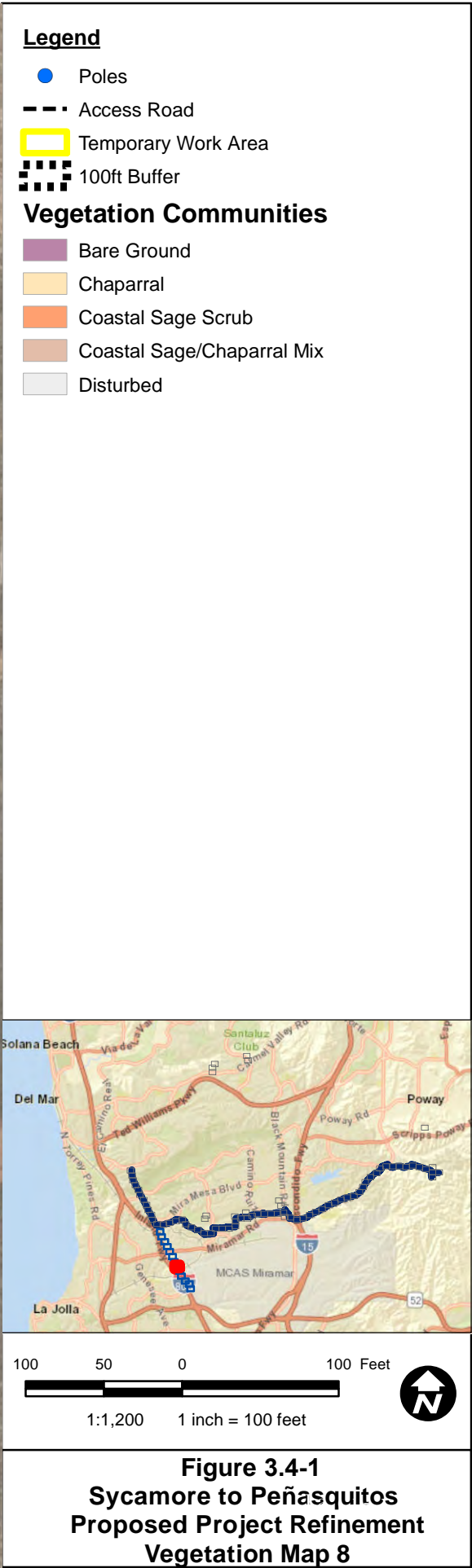
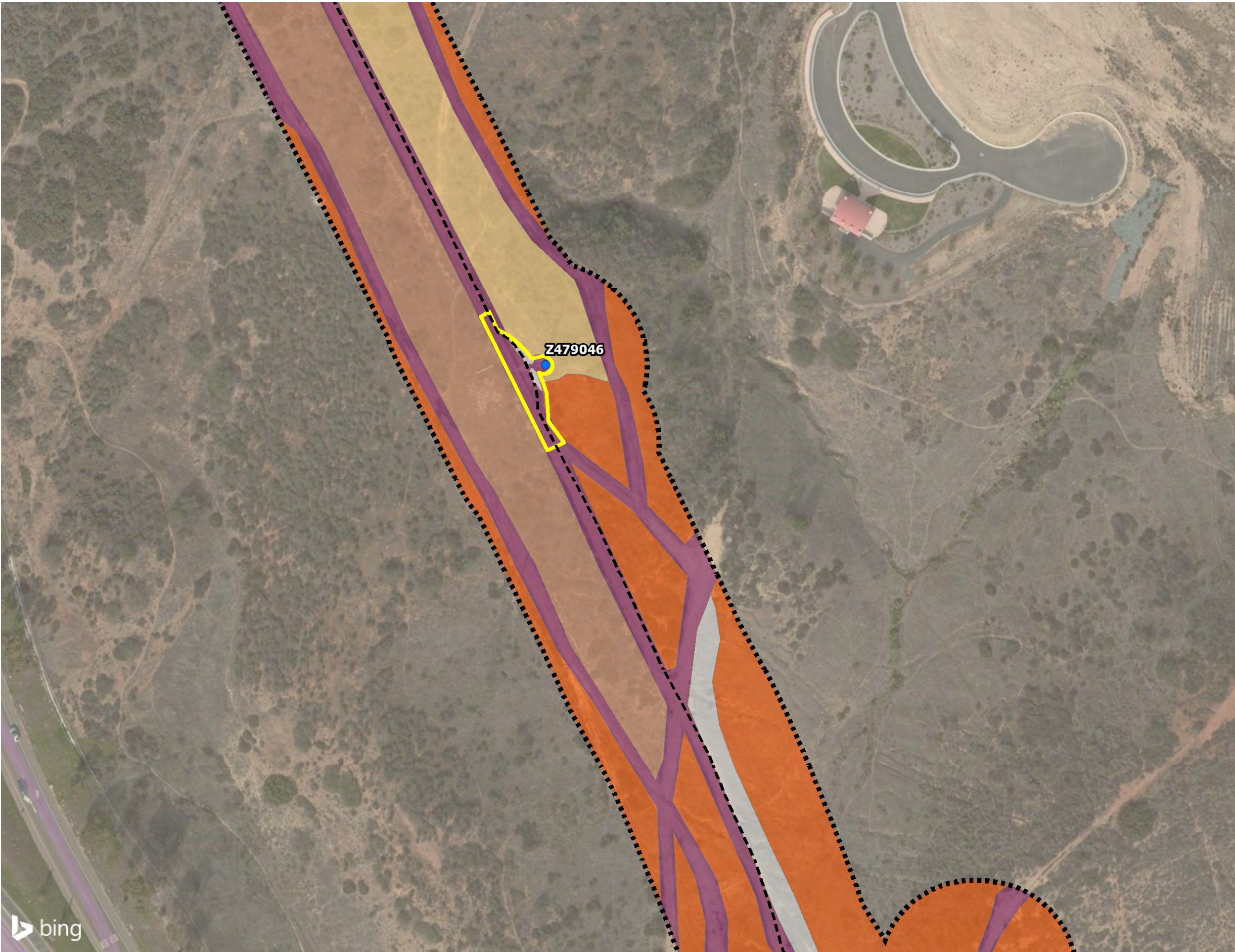
100 50 0 100 Feet

1:1,200 1 inch = 100 feet

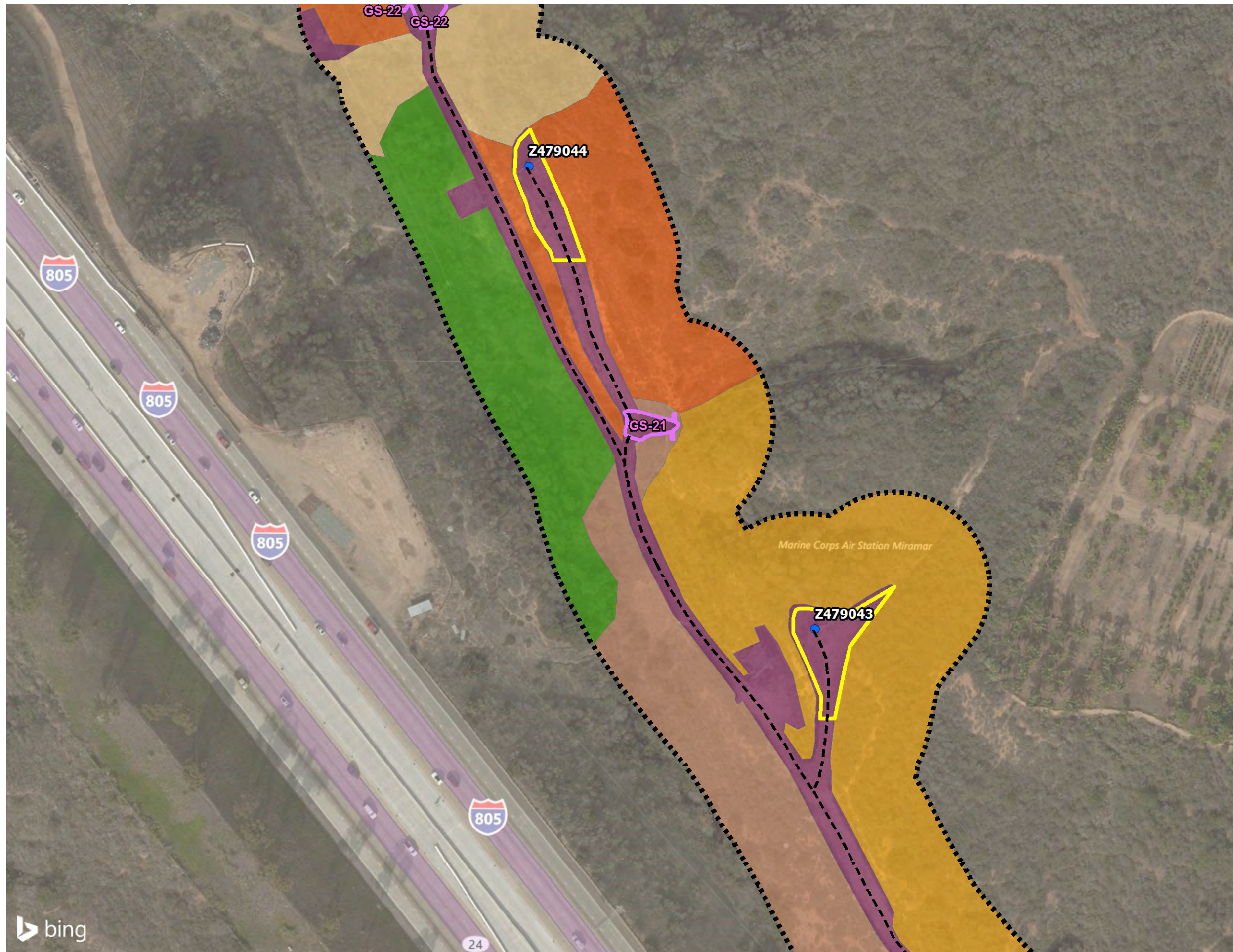
Figure 3.4-1
Sycamore to Peñasquitos
Proposed Project Refinement
Vegetation Map 5

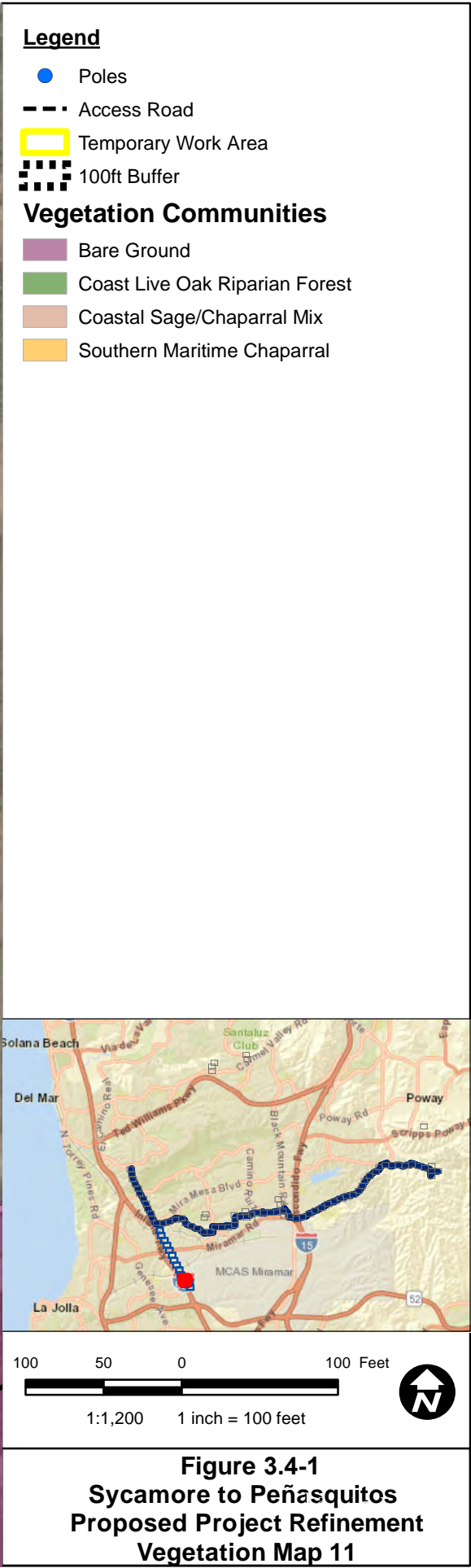
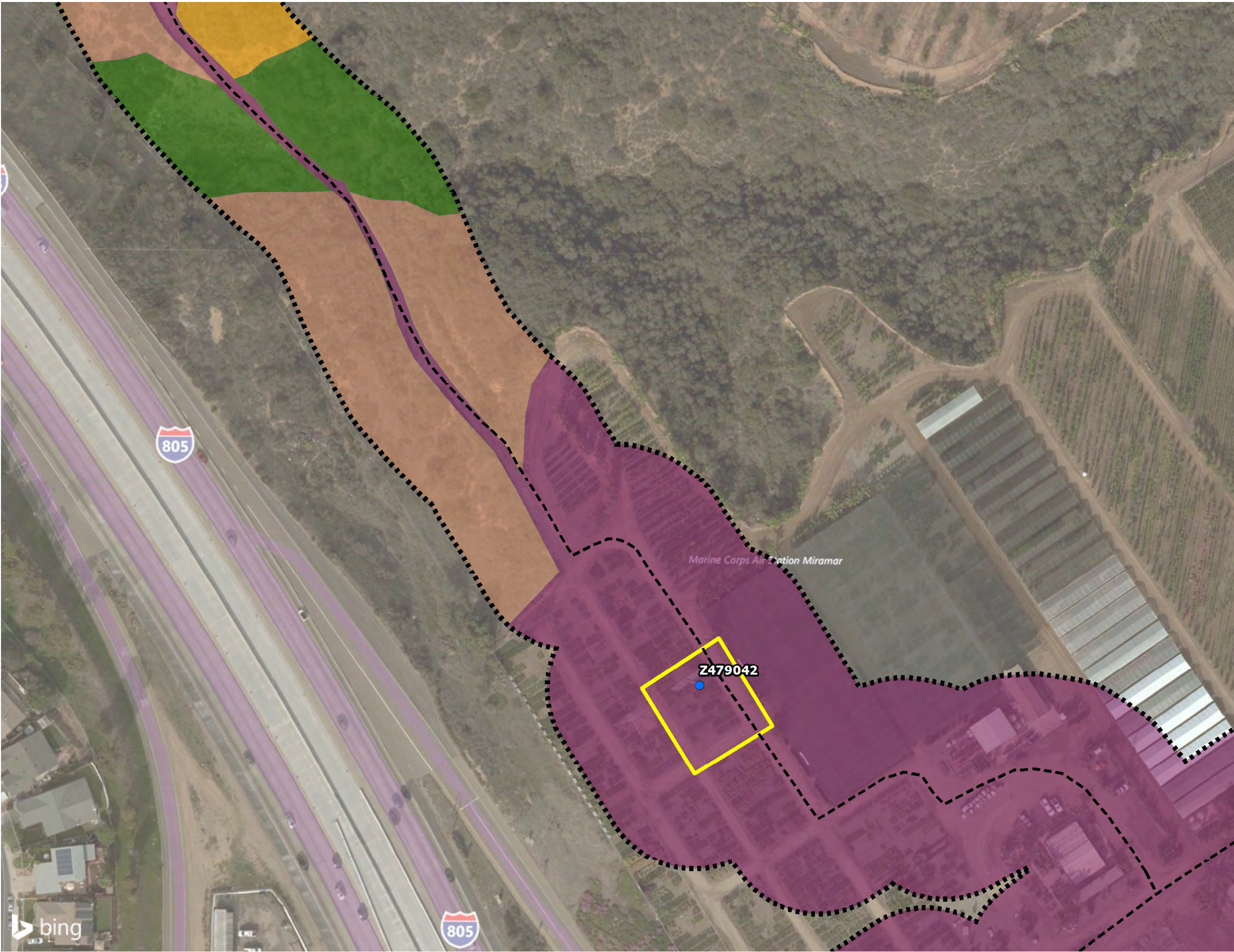


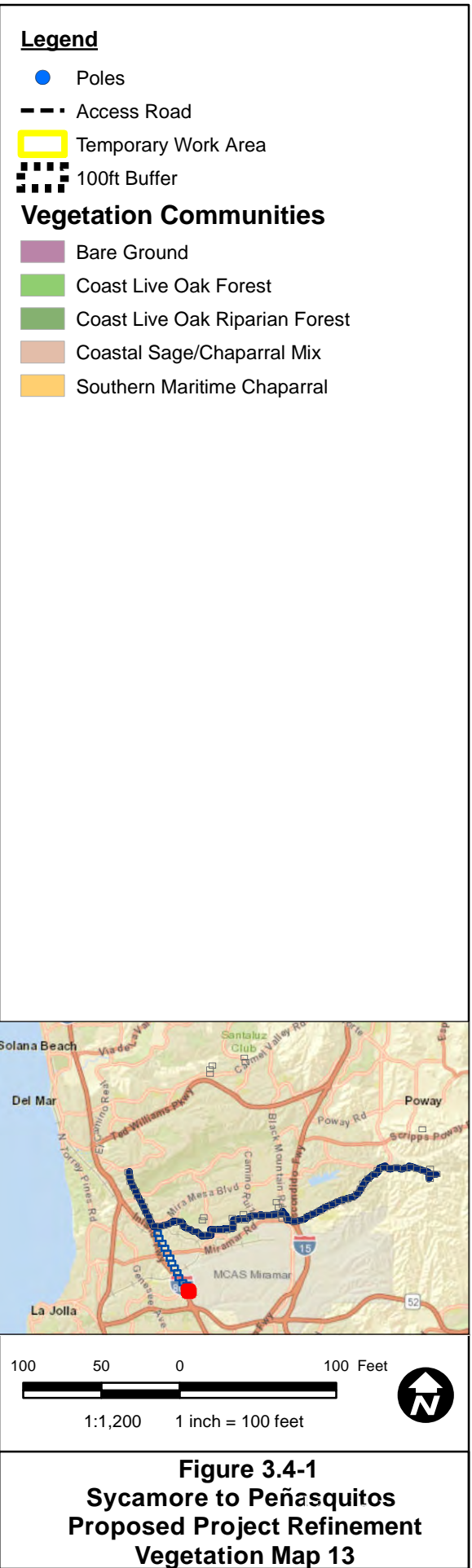
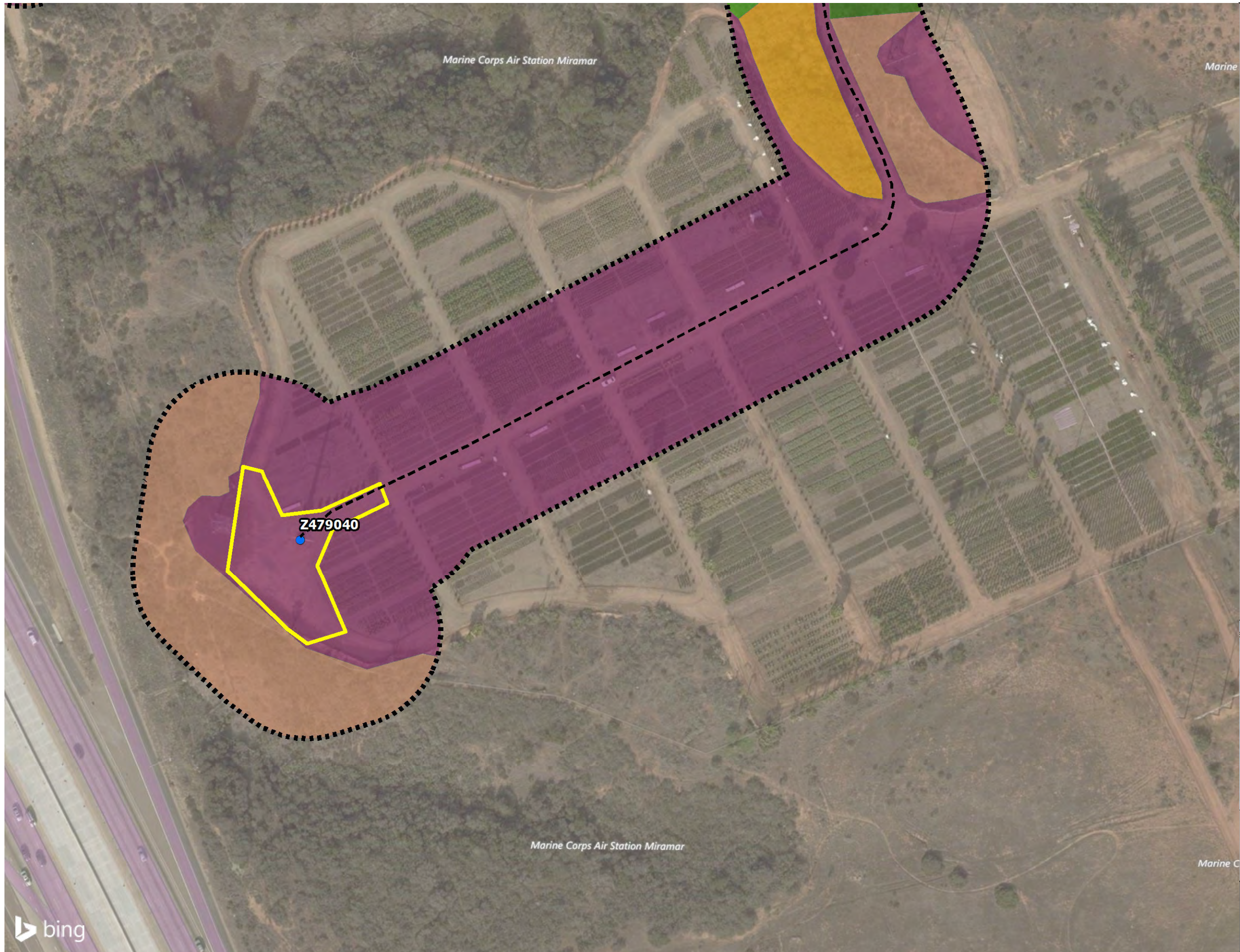












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3.4.1.3 Wildlife Corridors

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

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

3.4.1.4 Vernal Pools

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

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

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

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

3.4.1.5 Special-Status Plants

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

Table 3.4-2: Special-Status Plant Species

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

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

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

Species	Status ¹	Primary Habitat Association	Potential to Occur/Comments
Robinson's peppergrass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)	CRPR 4.3	Chaparral, coastal sage scrub	Potentially suitable habitat 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 Modification, impacts would be less than significant. No mitigation is required.
Willow monardella (<i>Monardella viminea</i>)	NCCP NE FE, CE CRPR 1B.1	Coastal sage or riparian scrub in sandy creek bottoms and on banks of ephemeral washes	The work areas at GS-22 and GS-23 are located immediately adjacent to a sandy-bottomed creek and provide habitat potentially suitable for this species. However, this species is a robust perennial that would have been detectable at the time of the survey, if present. This species was not detected during the survey, and no impacts to this species are anticipated.
Spreading navarretia (<i>Navarretia fossalis</i>)	NCCP FE CRPR 1B.1	Vernal pools and swales	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
San Diego mesa mint (<i>Pogogyne abramsii</i>)	NCCP FE, CE CRPR 1B.1	Vernal pools	Unlikely to occur in the road due to the high amount of disturbance. Potentially suitable habitat for this species occurs east of poles Z479049 and Z479050; however, this area would not be accessed for work activities. This species was not detected during the field survey, and no impacts are anticipated.
Nuttall's scrub oak (<i>Quercus dumosa</i>)	CRPR 1B.1	Sandy or clay soils in chaparral, coastal sage scrub, and closed-cone coniferous forests	Observed during the survey along a portion of the access road to pole Z479040, immediately adjacent to GS-21, and approximately 30 feet north of pole P479046, along the access road and east perimeter of the work area. Individuals would be flagged for avoidance, prior to construction. Therefore, impacts to this species are not anticipated.
Ashy spikemoss (<i>Selaginella cinerascens</i>)	CRPR 4.1	Coastal sage scrub, chaparral	Observed during the survey, although not documented by the CNDDDB within one mile of the Proposed Project Modification. An approximate 6-square-foot patch of this species was observed within a portion of the work area at pole P479050. Additionally, this species was observed immediately north of the work area at pole P479046 and approximately 30 feet south of the work area at pole P479048; however, these areas would not be accessed for the Proposed Project Modification. As stated in the FEIR, because of the lower sensitivity of this species, and low number of individuals impacted, impacts would be less than significant. No mitigation is required.

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

¹Status:

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

FE = Federally Endangered species

FT = Federally Threatened species

CE = State of California Endangered species

CRPR = California Rare Plant Rank

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

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

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

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

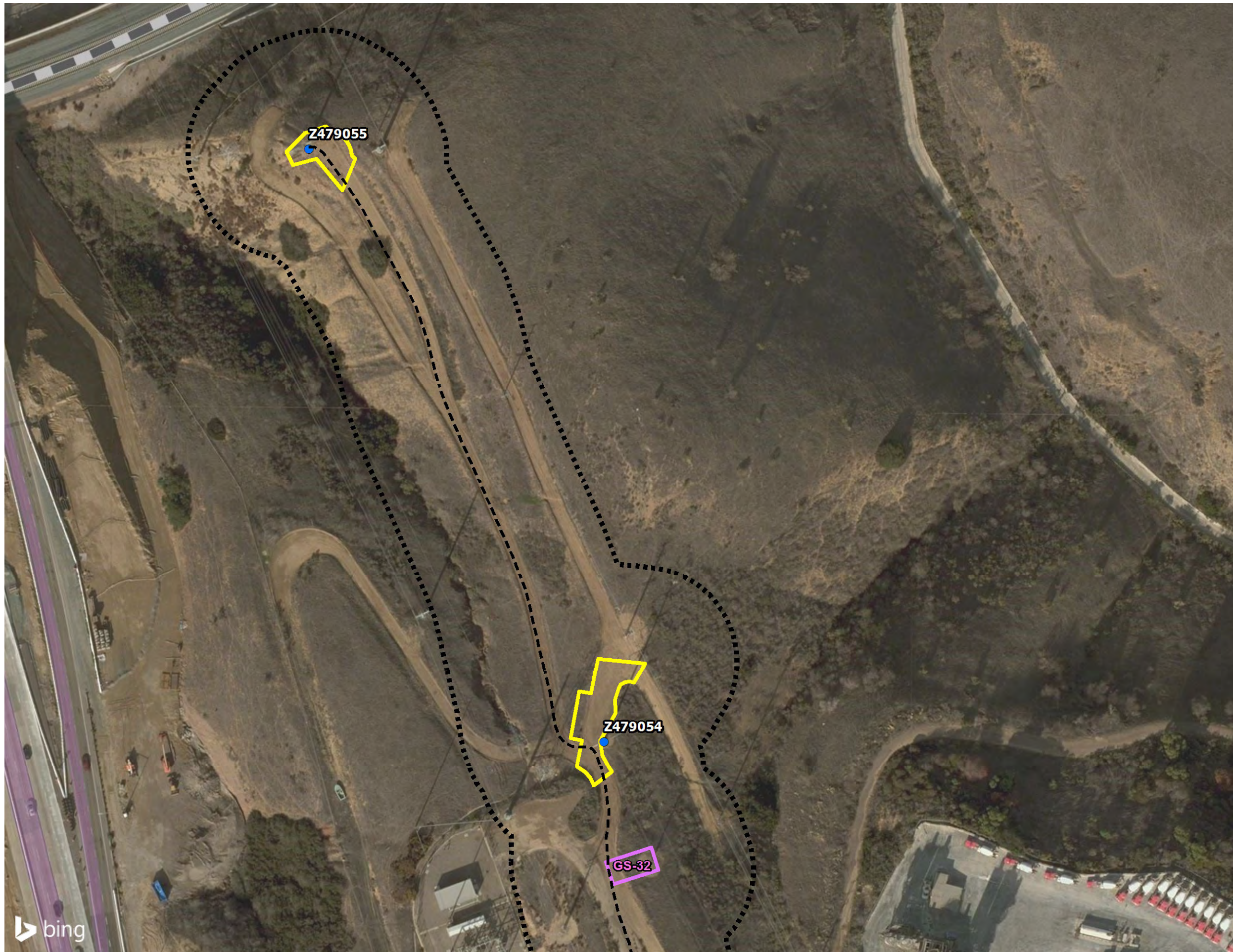
3: Plants About Which More Information is Needed - A Review List

4: Plants of Limited Distribution – A Watch List

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

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

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



Legend

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

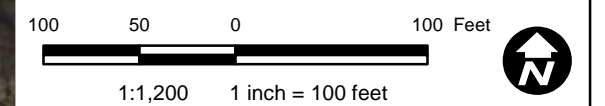
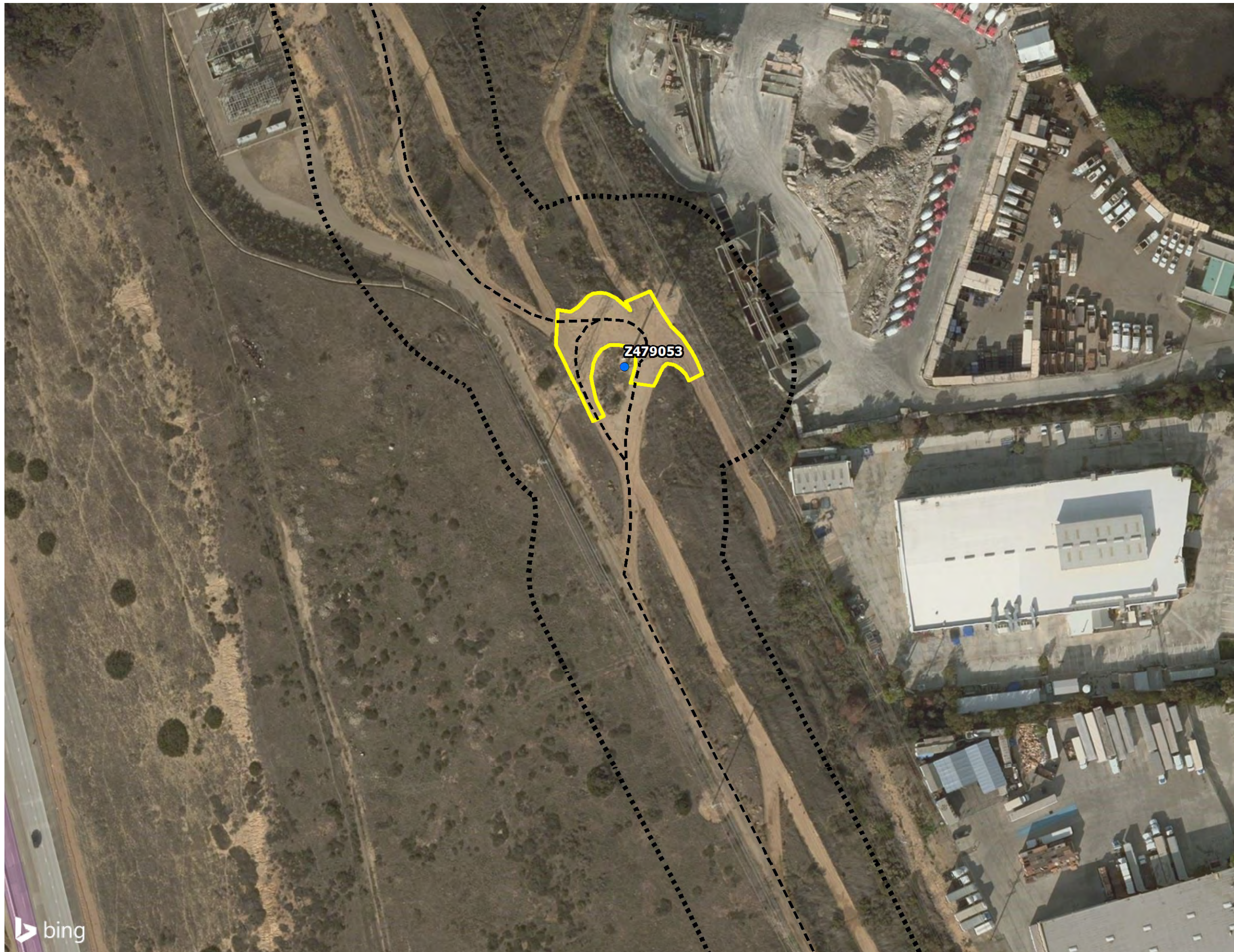


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 1



Legend

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

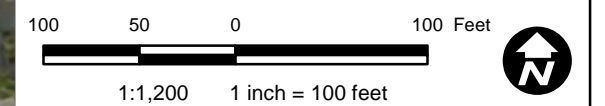
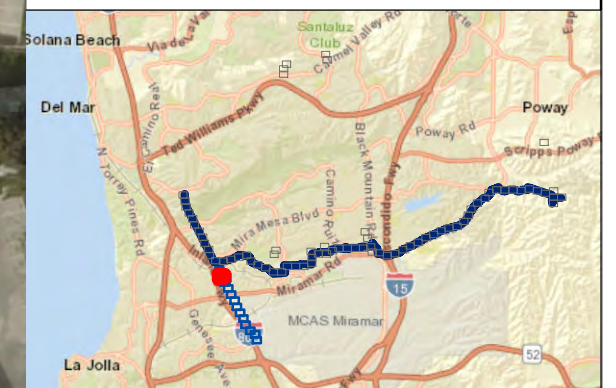
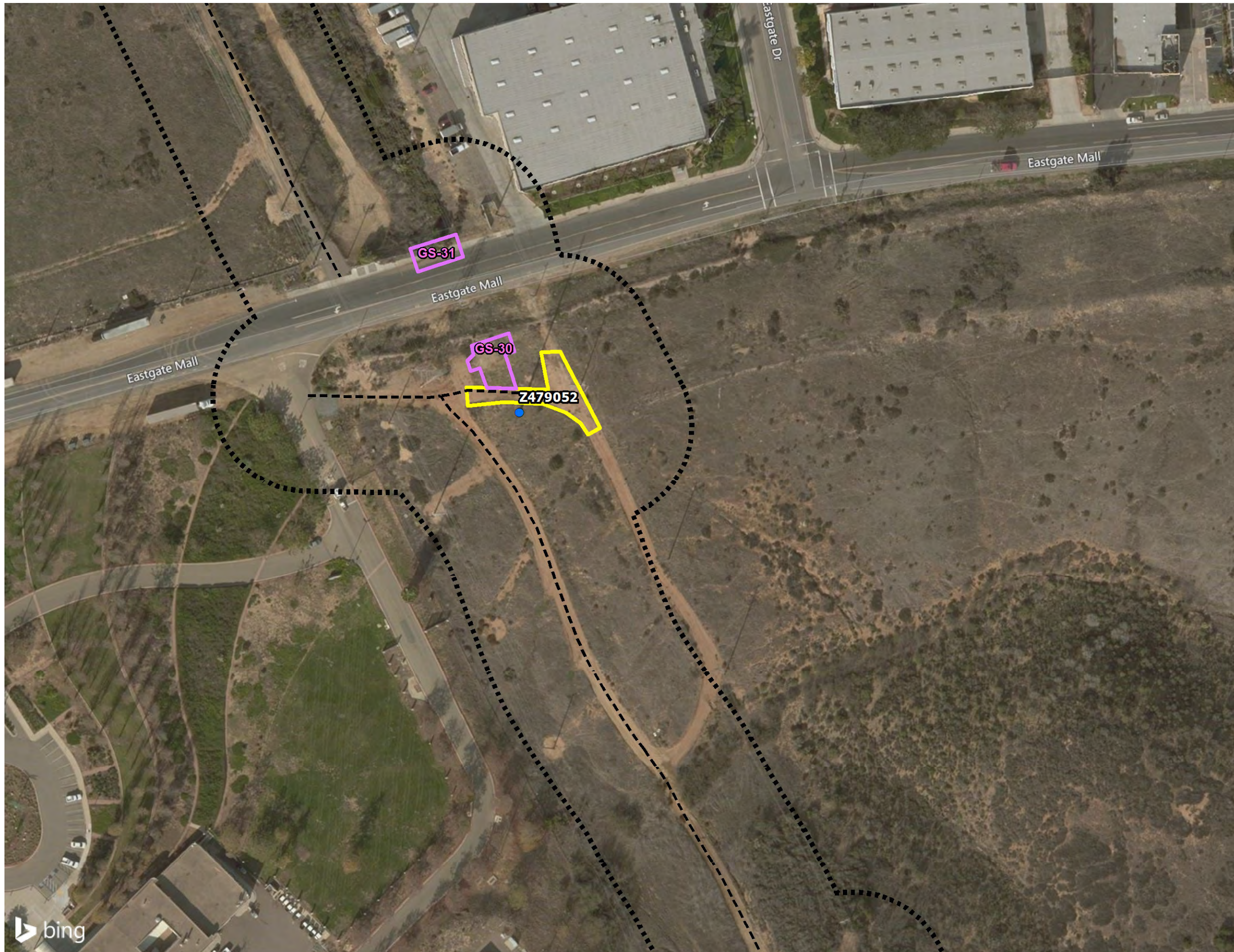


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 2



Legend

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

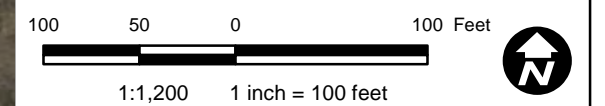
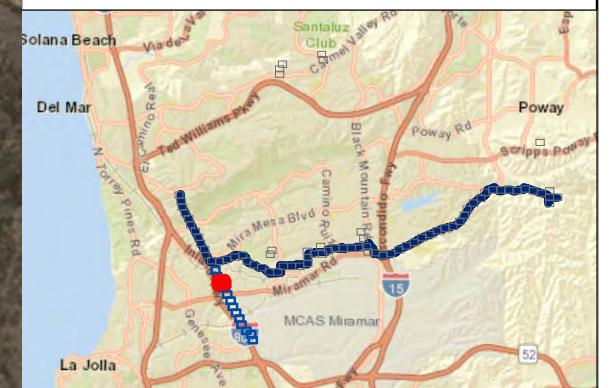
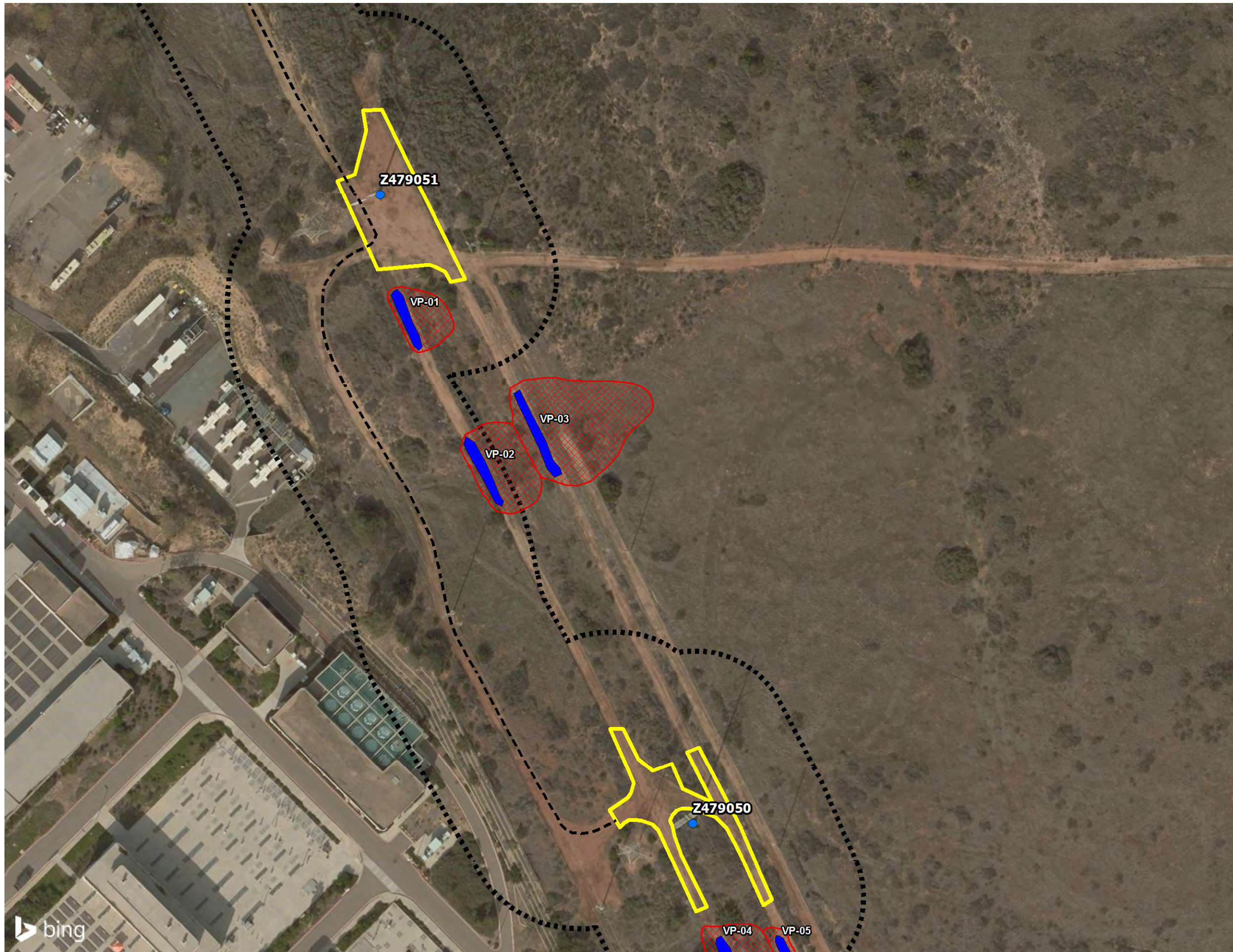


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 3



Legend

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

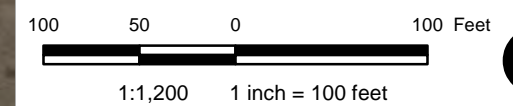
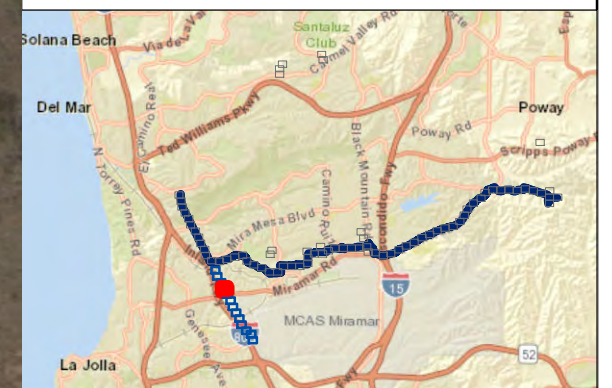
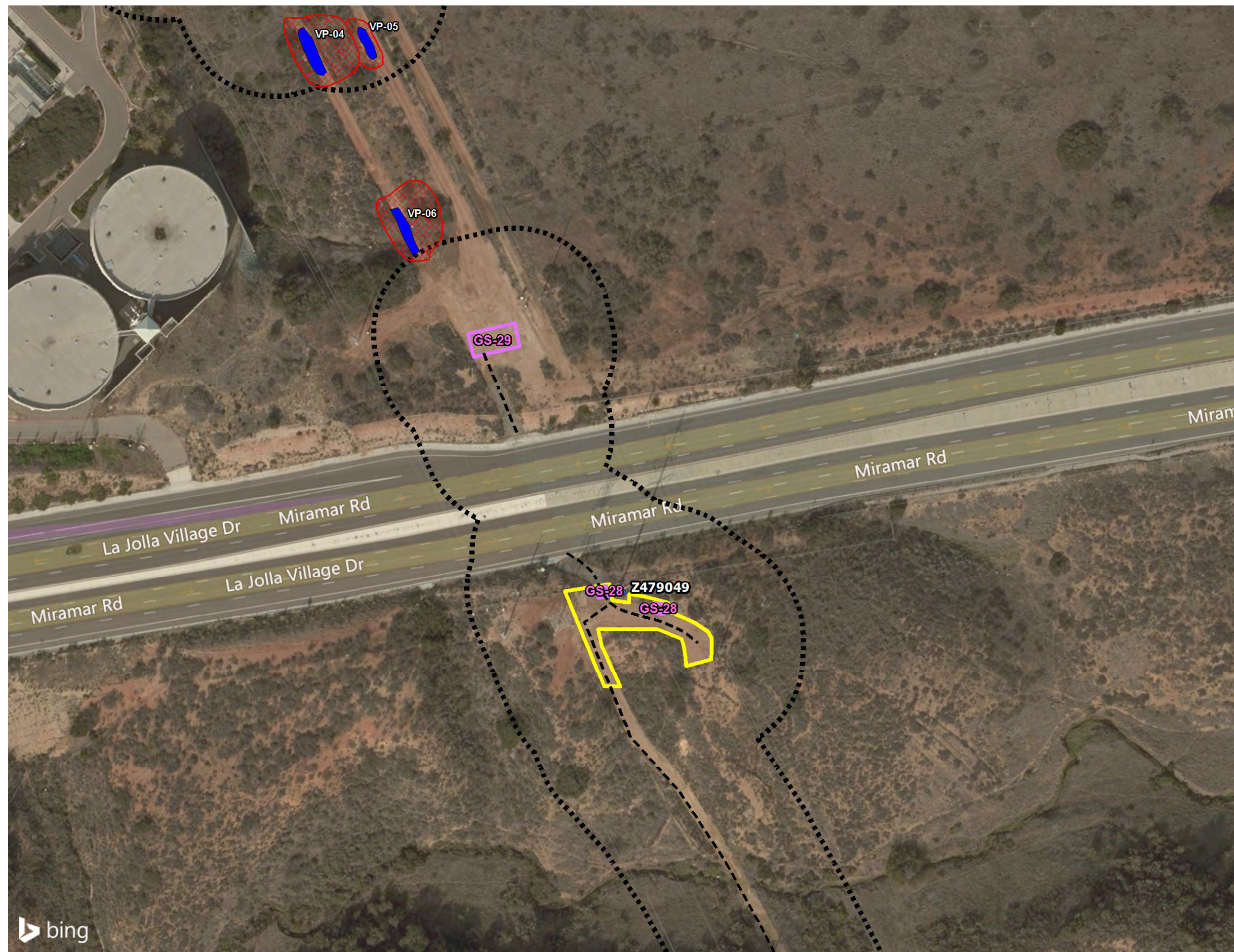


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 4



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

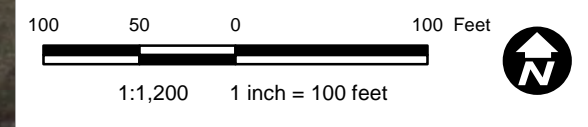
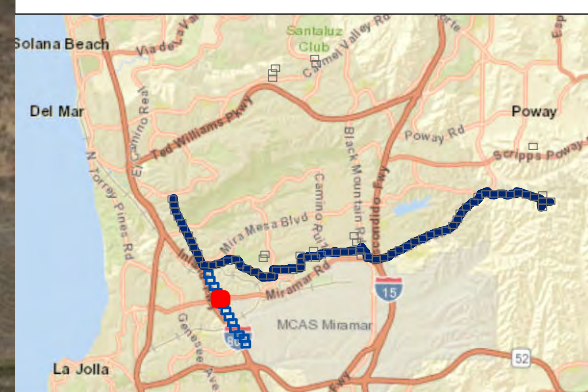
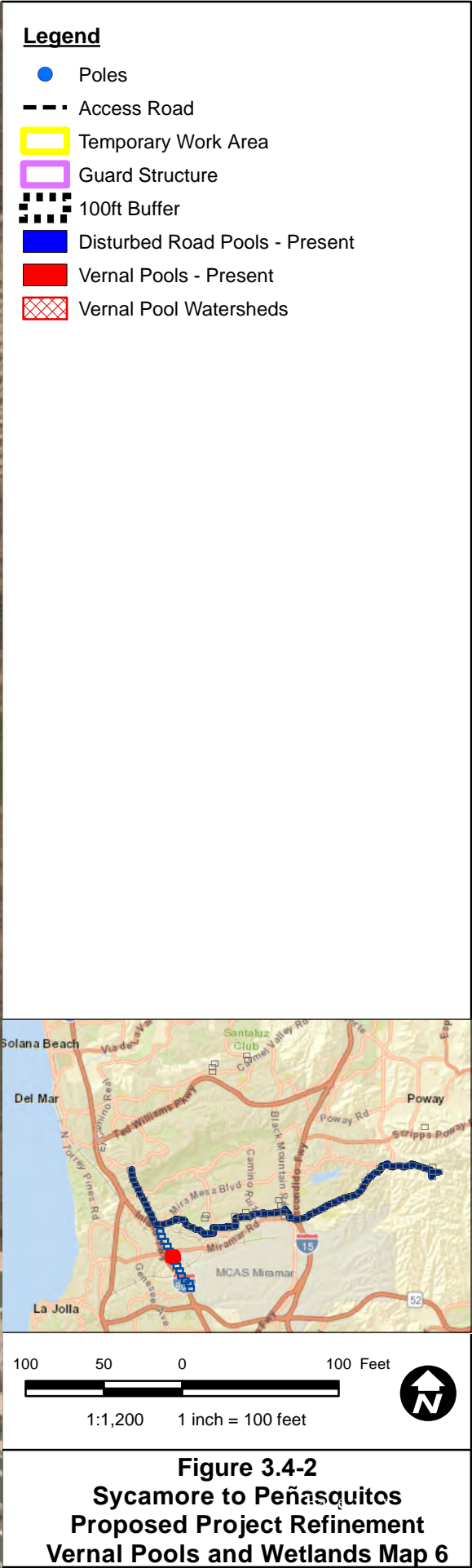
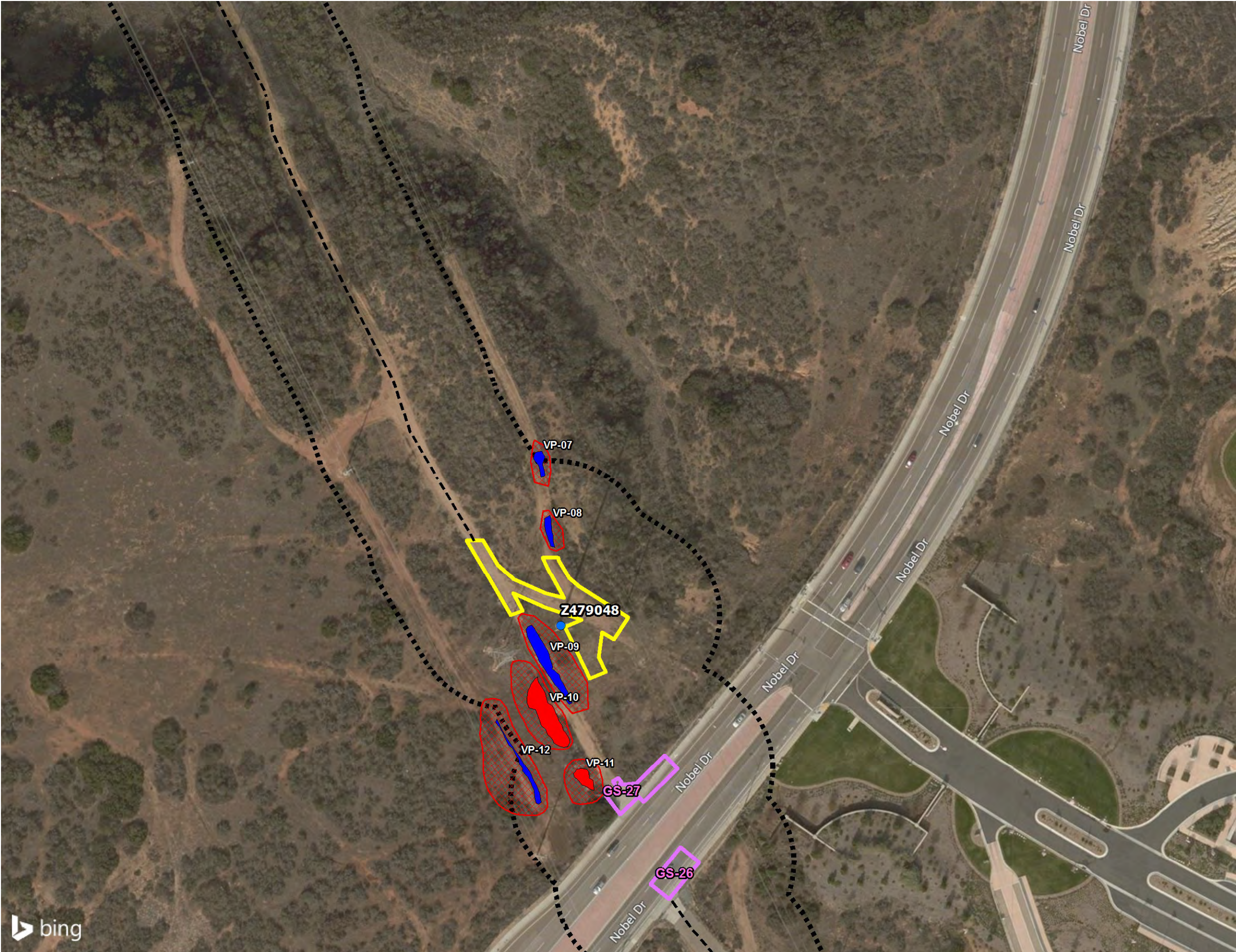
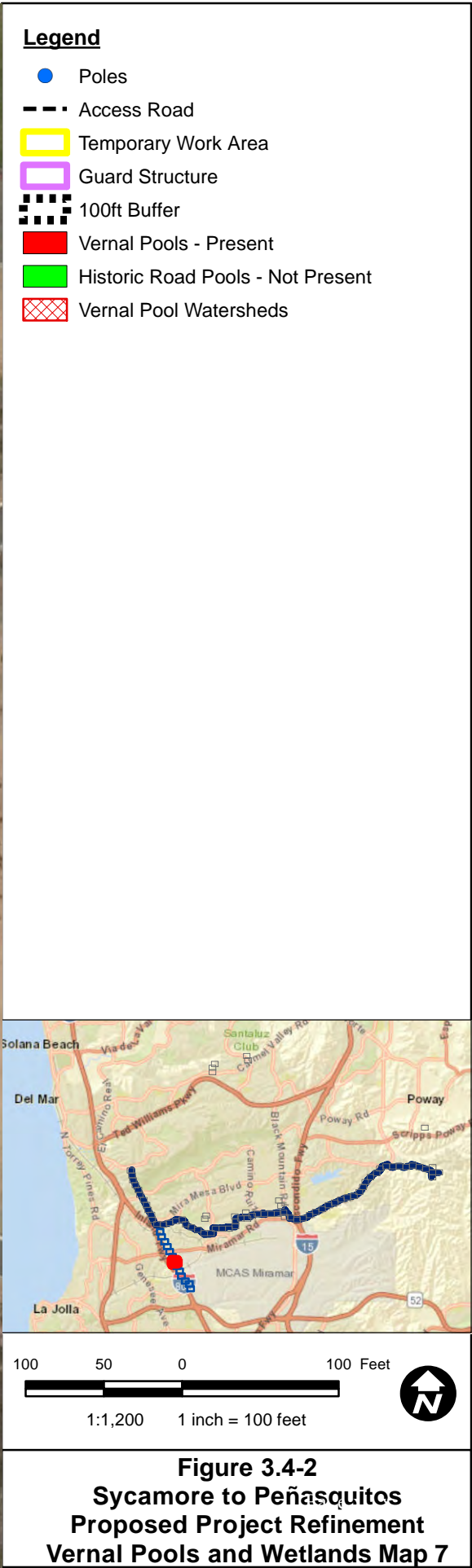
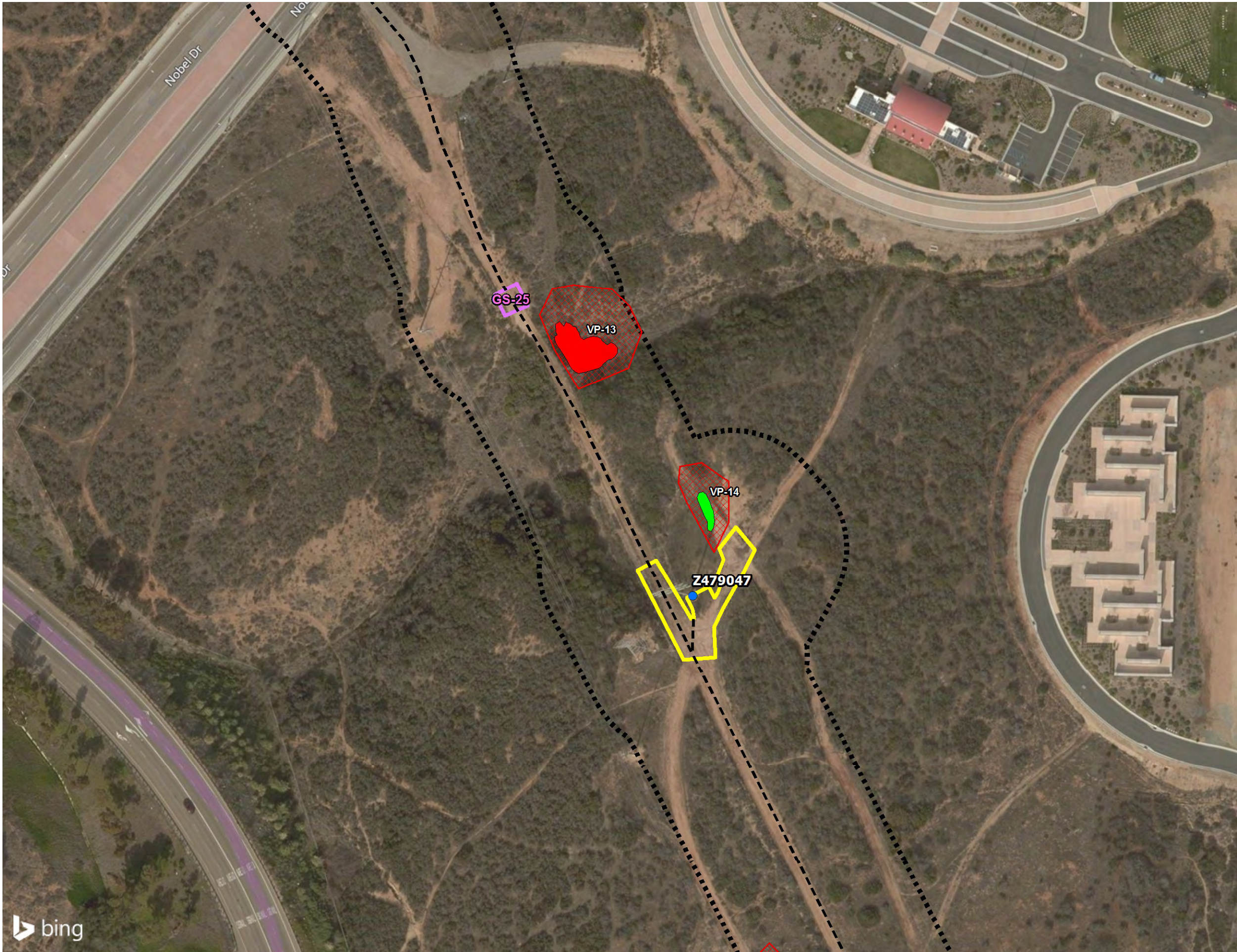
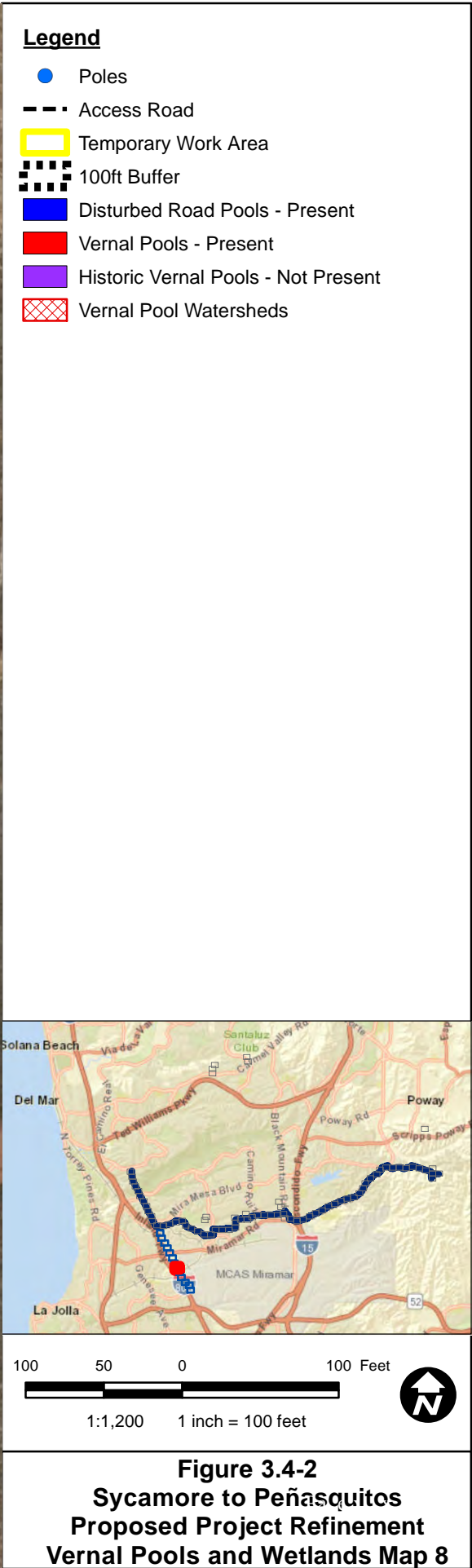
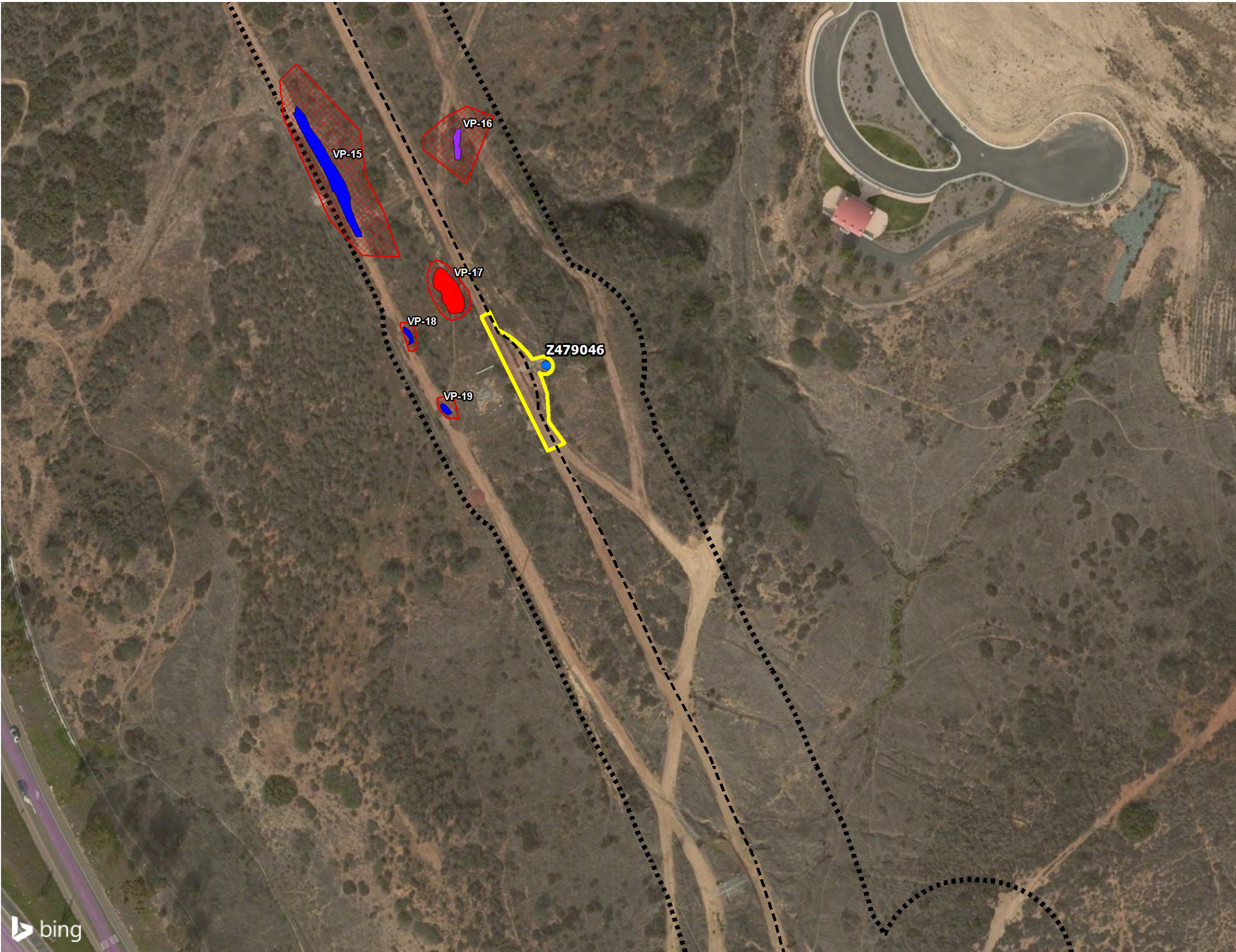


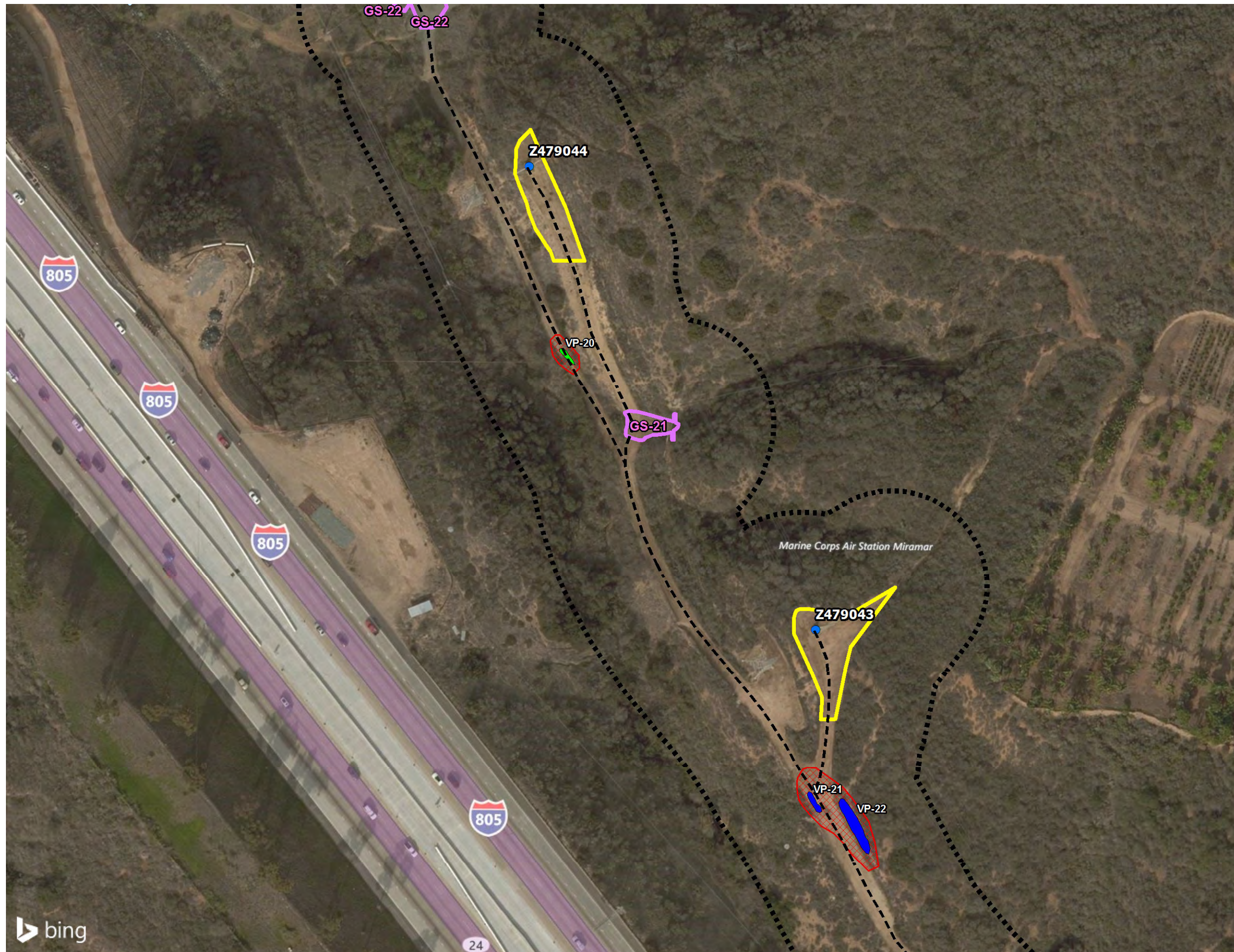
Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 5

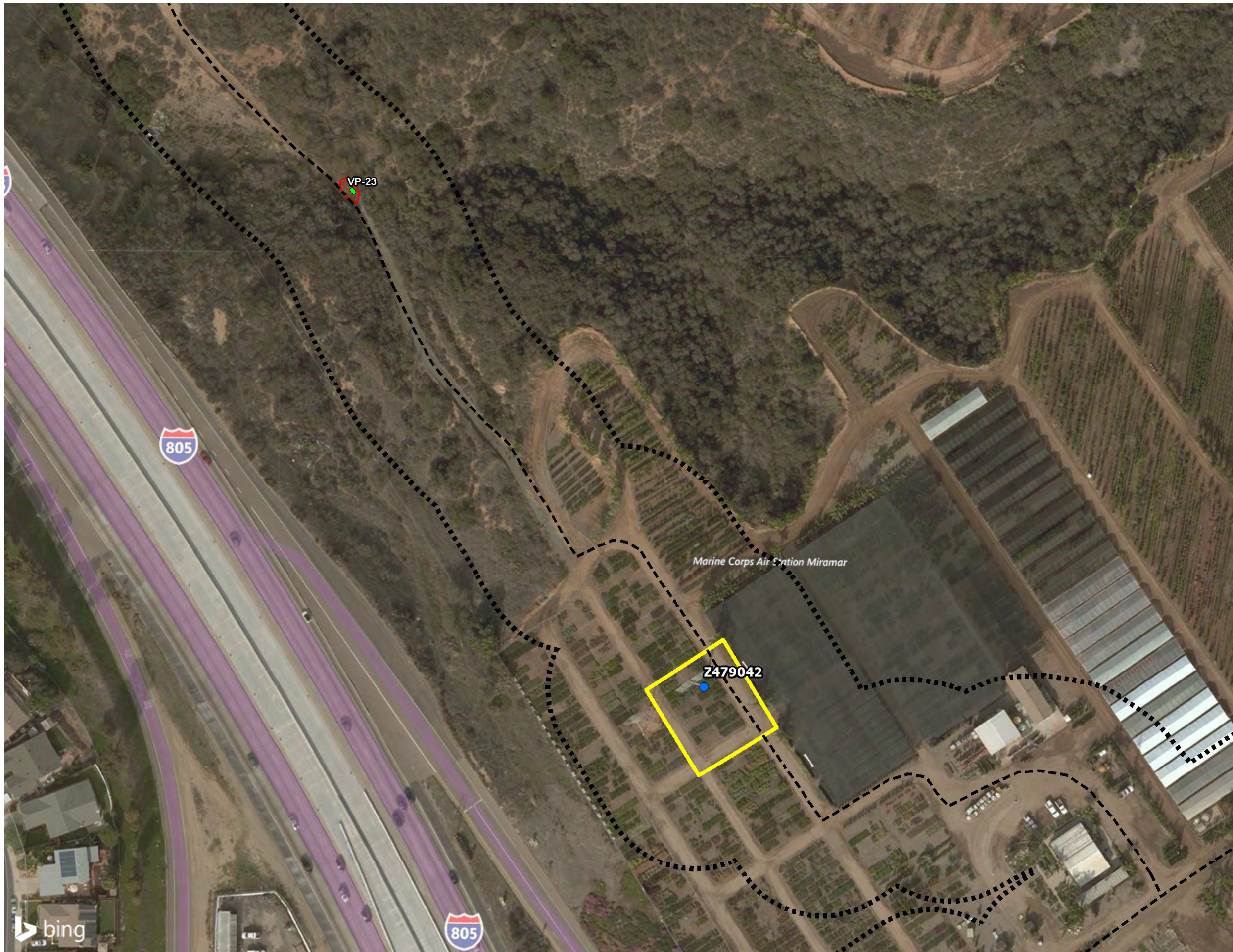














Legend

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

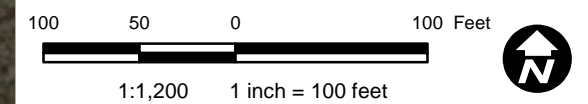
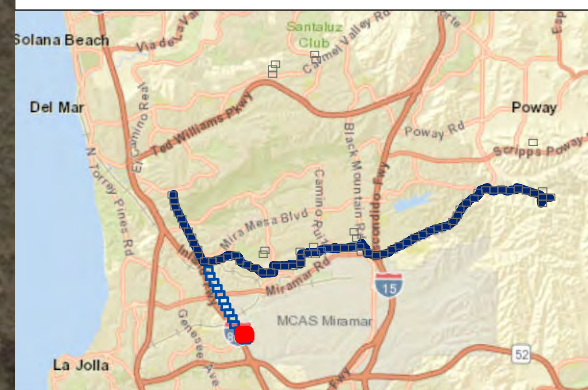


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 12



Legend

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

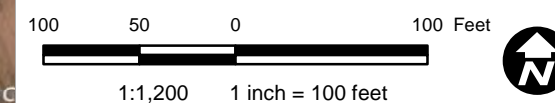
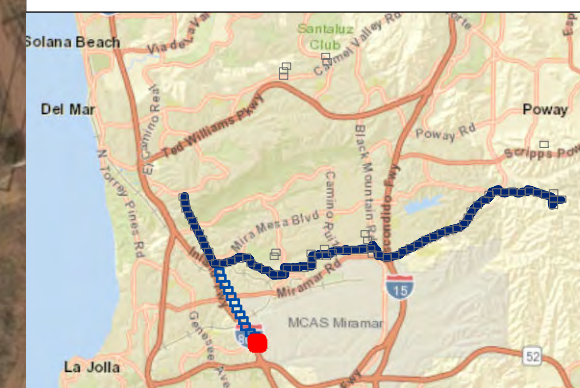


Figure 3.4-2
Sycamore to Peñasquitos
Proposed Project Refinement
Vernal Pools and Wetlands Map 13

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3.4.1.6 Special-Status Wildlife

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

Table 3.4-3: Special-Status Wildlife Species

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

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

¹Status:

NCCP = covered under SDG&E's NCCP

FE = Federally Endangered species

FT = Federally Threatened species

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

3.4.2 Potential Impacts

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

Table 3.4-4: Proposed Project Modification Impacts

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

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

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

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

3.4.2.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

Less than significant with mitigation

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

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

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

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

No Impact

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

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

Less than Significant with Mitigation

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

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

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

Less than Significant with Mitigation

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

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

Less than Significant with Mitigation

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

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

No Impact

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

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

Less than Significant with Mitigation

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

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

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

Less than Significant

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

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

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

No Impact

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

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

No Impact

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

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3.5 CULTURAL RESOURCES

3.5.1 Existing Conditions

In order to prepare the existing conditions section below, a cultural resource study of the Proposed Project Modification area was completed in August 2017. The study included a records search, a desktop review, and a pedestrian survey of locations that had not been previously surveyed (Figure 2-2). Additional information regarding cultural resources was obtained from the FEIR (CPUC 2016). The analysis of Tribal Cultural Resources is provided in Section 3.19

3.5.1.1 Cultural Records Search

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

3.5.1.2 Cultural Resources Field Survey Methods

The purpose of the cultural resource field survey was to relocate and update any previously recorded cultural resources, as well as to check for the presence/absence of any cultural resources on any previously unsurveyed portions of the Proposed Project Modification area that are located outside of MCAS Miramar. AECOM conducted a cultural resource field survey of the Proposed Project Modification area, in addition to a 98-ft. (30-meter) radius around each pole location and stringing site. MCAS Miramar is considered 100 percent inventoried; therefore, supplemental cultural resource surveys of MCAS property were not conducted (ASM Affiliates 2011). Of the 30 proposed work locations, 24 were located on MCAS Miramar property and were not surveyed. AECOM's cultural field surveys were conducted on August 17, 2017, with an additional field visit on August 25, 2017.

The total pedestrian field survey area was approximately 2.17 acres. Areas that had a low potential for cultural resources due to slopes greater than 25 percent or were inaccessible because of dense brush or ground cover were reviewed via a desktop analysis. In locations where sites had been previously recorded, transect spacing was decreased to 5 meters. Previously recorded sites on MCAS Miramar were not revisited as part of this study. Evidence for buried cultural deposits was observed through natural or artificial erosional exposures and the spoils from rodent burrows. The pedestrian surveys complied with the California Office of Historic Preservation instructions for recording cultural resources. All prehistoric and historic sites, both newly

discovered and previously recorded (if re-identified in the field), were recorded. No artifacts were collected during the surveys. The field survey results and report can be found in Appendix I.

3.5.1.3 Environmental Setting

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

Cultural Setting

Historic Background

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

Cultural Resources in the Proposed Project Modification Area

Records Search Results

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

Archaeological Field Survey Results

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

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

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

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

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

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

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

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

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

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

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

3.5.2 Potential Impacts

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

3.5.3.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

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

Less than Significant with Mitigation

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

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3.6 GEOLOGY, SOILS, AND MINERAL RESOURCES

3.6.1 Existing Conditions

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

3.6.2 Potential Impacts

3.6.2.1 Significance Criteria

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

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

No Impact

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

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

No Impact

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

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

No Impact

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

3.7 GREENHOUSE GAS EMISSIONS

3.7.1 Existing Conditions

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

3.7.2 Potential Impacts

3.7.2.1 Significance Criteria

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

Less than Significant

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

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

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

Less than Significant with Mitigation

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

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

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

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3.8 HAZARDS AND HAZARDOUS MATERIALS

3.8.1 Existing Conditions

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

3.8.1.1 Current Land Uses

Current land uses remain the same as the FEIR.

3.8.2 Potential Impacts

3.8.2.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

Less than Significant with Mitigation

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

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

No Impact

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

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

Less than Significant

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

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

No Impact

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

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

Less than Significant with Mitigation

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

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

No Impact

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

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

No Impact

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

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

Less than Significant Impact with Mitigation

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

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

Less than Significant

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

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

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

Less than Significant Impact with Mitigation

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

3.9 HYDROLOGY AND WATER RESOURCES

3.9.1 Existing Conditions

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

Surface Water Bodies and Wetlands

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

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

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

Floodplains

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

3.9.2 Potential Impacts

3.9.2.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

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

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

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

Less than Significant with Mitigation

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

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

No Impact

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

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

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

No Impact

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

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

Less than Significant

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

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

Less than Significant with Mitigation

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

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

No Impact

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

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

Less than Significant

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

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

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

Less than Significant

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

j) Inundation by seiche, tsunami, or mudflow?

Less than Significant

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

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3.10 LAND USE AND PLANNING

3.10.1 Existing Conditions

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

3.10.2 Potential Impacts

3.10.2.1 Significance Criteria

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

a) Would the project physically divide an established community?

No Impact

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

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

No Impact

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

Local Plans and Policies

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

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

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

No Impact

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

3.11 NOISE

3.11.1 Existing Conditions

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

3.11.1.1 Sensitive Receptors

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

3.11.2 Potential Impacts

3.11.2.1 Significance Criteria

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

Less than Significant

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

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

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

No Impact

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

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

No Impact

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

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

Less than Significant

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

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

Less Than Significant

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

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

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

No Impact

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

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3.12 PALEONTOLOGICAL RESOURCES

3.12.1 Existing Conditions

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

3.12.1.1 Paleontological Setting

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

3.12.2 Potential Impacts

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

3.12.2.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

3.13 POPULATION AND HOUSING

3.13.1 Existing Conditions

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

3.13.2 Potential Impacts

3.13.2.1 Significance Criteria

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

No Impact

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

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

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3.14 RECREATION

3.14.1 Existing Conditions

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

3.14.1.1 Recreational Setting

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

3.14.2 Potential Impacts

3.14.2.1 Significance Criteria

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

No Impact

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

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3.15 TRANSPORTATION AND TRAFFIC

3.15.1 Existing Conditions

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

3.15.2 Potential Impacts

3.15.2.1 Significance Criteria

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

Less than Significant with Mitigation

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

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

Less than Significant with Mitigation

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

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

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

No Impact

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

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

Less than Significant with Mitigation

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

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

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

Less than Significant with Mitigation

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

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

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

No Impact

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

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

Less than Significant with Mitigation

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

- h) Would the project result in inadequate parking capacity?**

No Impact

Construction workers and vehicles would park within staging yards and would not take up parking spaces within existing parking lots or result in the loss of street parking. There would be no loss of parking spaces or increase in demand for parking as a result of the Proposed Project Modification.

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3.16 UTILITIES AND PUBLIC SERVICE SYSTEMS

3.16.1 Existing Conditions

3.16.1.1 Regulatory Setting

The existing conditions of the utilities and services systems applicable to the Proposed Project Modification that have changed from what was previously described in the FEIR are summarized below by resource.

3.16.1.2 Parks

Rose Canyon Open Space is within 1000 ft. (approximately 640 ft. from Z479043) of the Proposed Project Modification and was not included in the FEIR. It is located west of the Proposed Project Modification and I-805. No libraries are located within 1,000 ft. of the Proposed Project Modification. Further details regarding parks are found in Section 4.17 (p. 4.17-14) of the FEIR.

3.16.2 Potential Impacts

The Proposed Project Modification would not involve the construction of new, or expansion of existing, water facilities, stormwater drainage facilities, and/or requirement of water entitlements, or creation of new solid waste disposal needs as analyzed in the FEIR.

3.16.2.1 Significance Criteria

- a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- d) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact

The Proposed Project Modification would not involve the generation of wastewater or the construction of new, or expansion of existing, water facilities, wastewater facilities, or stormwater drainage facilities; therefore, no impact would occur.

- e) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

No Impact

The Proposed Project Modification would not require new or expanded water entitlements. Consistent with the FEIR, SDG&E would utilize recycled water or non-potable water for approved construction uses, including dust control. The City of San Diego's Public Utilities Department has confirmed that approximately 25 million gallons of potable and recycled water shall be available for Project use during construction.¹ The Proposed Project Modification would have sufficient water supplies and no impact to existing water entitlements and/or resources would occur.

- f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

Less than Significant

The Proposed Project Modification does not involve the generation of excess soil and excavation materials. Construction of the Proposed Project modification would generate very minimal waste materials such as packaging (e.g., cardboard boxes, plastic wrapping, trash from consumables, etc.) and vegetation. All non-hazardous solid waste would be disposed of at a nearby licensed landfill would. Management and disposal of solid waste would comply with all applicable federal, state, and local statutes and regulations and no impact related to solid waste would occur.

Impacts would remain less than significant and no mitigation would be required.

- h) Would the Proposed Project cause substantial deterioration or damage to gas, water, or sewer pipelines or communications lines?**

No Impact

One gas pipeline is located within the transmission corridor of the Proposed Project Modification. The Proposed Project Modification would include overhead work and may require only minor ground-disturbing activities (i.e., vegetation and brush clearing) for the installation of guard structures. No ground-disturbing activities would occur above buried utility lines; therefore, no impacts to gas, water sewer pipelines, or communication lines are anticipated.

- i.) Would the Proposed Project cause substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or**

¹ Will serve letter received from the City of San Diego on September 30, 2014. Letter was provided to the CPUC on October 14, 2016.

physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?

No Impact

Construction of the Proposed Project Modification is not anticipated to require additional and/or different fire protection or emergency services (fire protection and police protection) from those included in the FEIR. Rose Canyon Open Space, located to the west of the Proposed Project Modification and I-805, would not be affected by the Proposed Project Modification. The majority of the Proposed Project Modification would occur within MCAS Miramar and would not cause a new direct and/or indirect impact to schools and/or parks that was not analyzed in the FEIR.

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3.17 WILDFIRE

3.17.1 Existing Conditions

The existing conditions pertaining to wildfire for the Proposed Project Modification would be the same as the existing conditions of fire and fuels management included in Section 4.12.2 of the FEIR (pg. 4.12-2). 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 [FRA]). 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 (County of San Diego 2019). Moderate and high, and very high fire hazard severity zones (FHSZs) are mapped within SRAs and LRAs. LRA fire protection is typically provided by city fire departments, fire protection districts, and counties, and by CAL FIRE under contract to local government (CAL FIRE 2019).

Additionally, the CPUC defines high fire threat areas in the CPUC General Order 95: Rules for Overhead Electric Line Construction. The high fire-threat areas (HTFA) consist of the following three Tiers:

- *Tier 1* consists of High Hazard Zones (“HHZs”) on the map of Tree Mortality HHZs prepared jointly by the United States Forest Service and CAL FIRE. Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and represent a direct threat to public safety.
- *Tier 2* consists of areas on the CPUC’s Fire-Threat Map where there is an elevated risk for destructive utility-associated wildfires. The CPUC Fire-Threat Map was approved by the CPUC on January 19, 2018.
- *Tier 3* consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires.

Three agencies are responsible for emergency services within the Proposed Project Modification; San Diego County Office of Emergency Services (OES), City of San Diego Fire-Rescue Department, and the Miramar Fire Department. OES coordinates the overall response to disasters within San Diego County. Emergency medical, fire protection, and hazardous materials services for the majority of the Proposed Project area (i.e., the portion within the City of San Diego) are provided by the City of San Diego Fire Rescue Department. The majority of the Proposed Project Modification Area is located on MCAS Miramar and would be the responsibility of the Miramar Fire Department.

3.17.2 Potential Impacts

3.17.2.1 Significance Criteria

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Less than Significant with Mitigation

Review of the California Fire Hazard Severity Zone Maps indicates that the Proposed Project Modification is not located within an SRA. The portion of the Proposed Project Modification within the boundaries of MCAS Miramar is located within the FRA. The portion of the Proposed Project Modification located outside of the boundary of MCAS Miramar is located within the LRA. The LRA is defined as having very high and high fire hazard severity zones (CAL FIRE 2019). Fire hazard severity zones are not mapped within the FRA, but site conditions are similar across all areas of the Proposed Project Modification Area that occur within open space.

The Proposed Project Modification is located within the CPUC Tier 2 HFTA and outside of the HFTAs. The requirements in the Fire-Safety Regulations adopted on December 14, 2017 would be applied, as applicable to the Proposed Project Modification located in the Tier 2 HFTA.

The Proposed Project Modification would not interfere with the emergency plans included in Section 4.11.3 (pg. 4.11-3) of the FEIR. To ensure that emergency response is maintained, SDG&E would coordinate with all local emergency services prior to construction. No public road closure is proposed as the access roads are not open to the public. Construction of the Proposed Project Modification is not anticipated to require additional and/or different fire protection or emergency services (fire protection and police protection) from those included in Section 4.11.3 (pg. 4.11-3) of the FEIR. SDG&E would implement MM Fire-2, which would require that construction crews and activities do not create obstructions to firefighting equipment or crews and that emergency ingress and egress to access roads are maintained, as described in Section 4.12.7 (pg. 4.12-31 and 4.12-32) of the FEIR. Implementation of MM Fire-2 would reduce potential impacts to emergency response and evacuation in the event of a fire. Therefore, in the event of a fire, the impact to an adopted emergency response plan or emergency evacuation plan would be less than significant.

- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

Less than Significant with Mitigation

The Proposed Project Modification includes re-tensioning and sagging an existing transmission line. The project does not involve the construction of permanent or temporary structures that would be occupied by people. Construction personnel would be in the vicinity of the project

during daytime hours for approximately two weeks. The Proposed Project Modification would involve the use of standard construction equipment that has the potential to ignite. SDG&E would implement the approved Construction Fire Prevention Plan for the Project as required by MM Fire-1 in Section 4.12 (pg. 4.12-30 and 4.12-31) of the FEIR. Impacts related to potential exposure of project occupants to pollutant concentrations in the event of a fire would be less than significant.

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Less than Significant with Mitigation

The Proposed Project Modification includes regular maintenance of an existing transmission line that would involve standard construction activities. The Proposed Project Modification does not include the installation or maintenance of fuel breaks, emergency water sources, or other utilities. Existing access roads would be utilized for re-tensioning and sagging activities. Maintenance of existing facilities would not result in any ongoing increase in fire risk. As noted above, SDG&E would implement the Construction Fire Prevention Plan (as required by MM Fire-1) as described in Section 4.12 (pg. 4.12-30 and 4.12-31) of the FEIR. Implementation of MM Fire-1 would reduce potential impacts from construction activities. With implementation of this measure, potential temporary impacts to the environment in the event of a fire would be less than significant.

- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

Less than Significant

The Proposed Project Modification is located primarily within open space along existing dirt access roads in relatively flat terrain within existing SDG&E ROW. The Proposed Project Modification includes work on existing structures, does not involve the installation of new structures, and is not located within areas open to the public. Work would be performed over a two-week period and would not occur in areas prone to flooding or landslide as a result of runoff, post-fire slope instability, or drainage changes. In the event of a fire, the Proposed Project Modification would not expose people or structures to significant flooding or landslides as a result of runoff, post-fire instability, or drainage changes. Therefore, the impact exposing people or structures to significant risks in the event of a fire would be less than significant.

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3.18 ENERGY

3.18.1 Existing Conditions

SDG&E supplies power to homes and businesses in San Diego and Orange Counties. The energy is provided from a variety of sources; about 45 percent of the current energy mix comes from renewable resources such as solar, wind, and other renewable energy sources. SDG&E does not use any coal sources.

The Integrated Resource Plan (IRP) process is the statewide approach to electric resource planning for achieving the State’s GHG goal for the electric sector through and beyond 2030. SDG&E’s Individual Integrated Resource Plan (IIRP) is guided by the following principles: (i) ensuring reliability, (ii) reducing GHG emissions with the best-fit resources at the lowest possible cost, and (iii) meeting the state’s Renewables Portfolio Standards (RPS) program goals.

As stated in the IIRP, SDG&E is “well positioned to meet the 2030 GHG target” (SDG&E 2018). The IIRP includes all of the required data and analysis, and SDG&E has surpassed the State’s RPS targets, as noted above, serving almost half its load with renewable energy.

3.18.2 Potential Impacts

3.18.2.1 Significance Criteria

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less than Significant with Mitigation

The Proposed Project Modification includes re-tensioning and sagging an existing transmission line. As described in FEIR Section 7.2 (pg. 7-7 and 7-8) 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 and components not needed for the Proposed Project Modification to the greatest extent feasible. The reuse and recycling of existing components would partially offset the energy needed to produce new materials. Additionally, the existing 230-kV transmission line would continue to assist in the delivery of a significant portion of renewable energy to SDG&E customers.

Additional consumption of energy resources would stem from the use of fuel for construction vehicles/equipment. The type of equipment and duration of construction activities associated with the Proposed Project Modification are consistent with those discussed in FEIR Section 4.14. Construction activities would be short term (approximately two weeks) and would occur during daytime hours. No night lighting is anticipated. Additionally, the Proposed Project Modification would implement MM Air-4, which would require the use of construction equipment that meets

a minimum of Tier 3 emissions standards. Tier 3 equipment is more energy efficient than Tier 2 and Tier 1 equipment. Additionally, MM Air-2 would be implemented, which would reduce vehicle idling times and APM Air-5 would be implemented to reduce GHG emissions by using energy-efficient construction vehicles as required by AB 32. MM Air-2 and APM Air-5 would be implemented as described in Section 4.13.6 (pg. 4.13-15) of the FEIR. Therefore, environmental impacts resulting from the use of energy resources would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant

SDG&E currently provides a significant volume of clean, renewable energy to its customers (SDG&E 2018). The Proposed Project Modification includes re-tensioning and sagging an existing transmission line. The Proposed Project Modification includes standard operational procedures to an existing transmission line, which would ensure reliability and allow improvements to SDG&E's transmission facilities that are required to facilitate SDG&E's implementation of the IIRP, including achieving the State's RPS standards, Senate Bill 350, and Senate Bill 100. Thus, the Proposed Project Modification would not conflict with the goals of the IIRP or conflict with a state or local plan for renewable energy or energy efficiency. Additionally, SDG&E would implement APM Air-5 to reduce GHG emissions by using energy-efficient construction vehicles as required by AB 32 and as described in Section 4.13.6 (pg. 4.13-15) of the FEIR. APM Air-5 would be implemented as described in Section 4.13.6 (pg. 4.13-15) so that the Proposed Project Modification would not conflict or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

3.19 TRIBAL CULTURAL RESOURCES

3.19.1 Existing Conditions

The existing conditions pertaining to Tribal Cultural Resources remain the same as described in Section 4.3.3.4 pg. 4.3-20 of the FEIR.

3.19.2 Potential Impacts

3.19.2.1 Significance Criteria

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant with Mitigation

The Proposed Project Modification is not anticipated to have significant impacts to a tribal cultural resource defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape. Additionally, the Proposed Project Modification is not anticipated to have impacts to a resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. See Section 3.5 for additional discussion of cultural resources. Tribal consultation continues throughout all phases of the Project, as necessary. If any unanticipated Tribal Cultural Resources are revealed during construction within the Proposed Project Modification area, they would be avoided, preserved in place, or handled as determined appropriate during consultation and as required by MM CUL-1. As a result, any potential impacts would be less than significant.

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4. APPLICANT-PROPOSED AND MEASURES AND MITIGATION MEASURES

The Proposed Project Modification would implement Project APMs and MMs outlined in the FEIR. No new potentially significant impacts related to the resources analyzed are anticipated; therefore, no new APMs are proposed and no new MMs appear warranted.

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5. SUMMARY OF IMPACTS

As described herein, no new significant impacts would occur as a result of the Proposed Project Modification. As a result, no new Mitigation Measures (MMs) and/or Applicant Proposed Measures (APMs) are proposed. The Proposed Project Modification would implement existing MMs and APMs as applicable. Impacts resulting from operation and maintenance (O&M) activities are not analyzed in this Assessment, as the Proposed Project Modification includes work on an existing transmission line and no new permanent facilities would be installed as a result of the work. Table 5-1 below provides a summary of impacts by resource area.

Table 5-1: Summary of Impacts Table

Resource Area	Level of Significance	Applicable Mitigation Measures from FEIR
Aesthetics	Less than Significant	
Agriculture and Forestry Resources	No Impact	
Air Quality	Significant and Unavoidable	MM Air-1, MM Air-3, MM Air-4, APM AIR-1, APM AIR-2,
Biological Resources	Less than significant with mitigation	APM AIR-1, APM HYDRO-2, APM HAZ-1, APM HAZ-2, MM Biology-1a through 1d, MM Biology-3, MM Biology-6, MM Biology-7, APM BIO-2
Cultural Resources	Less than Significant with Mitigation	APM CUL-1, APM Cul-2, MM Cul-1, MM CUL-2, MM CUL-3, MM CUL- 4
Geology, Soils, and mineral resources	No Impact	
Greenhouse Gas Emissions	Less than Significant with Mitigation	MM GHG-1, APM Air-5
Hazards and Hazardous Materials	Less than Significant with Mitigation	MM Fire-1, MM Fire-2, MM Fire-3, APM Fire-1, MM Hazards-1, MM Hazards-2, Hazards-3, MM Hazards-4, MM Hazards-6, MM Traffic-1, MM Traffic-6, MM Traffic-8, Utilities-3
Hydrology and Water Resources	Less than Significant with Mitigation	MM Hydrology-1, MM Hydrology-2, MM Utilities-1, MM Hydrology-1, MM Hazards-2, APM Hazards-1, APM Hazards-2
Land Use and Planning	No Impact	
Noise	Less Than Significant	
Paleontological Resources	Less than Significant with Mitigation	MM Paleontology-1, MM Paleontology-3
Population and Housing	No Impact	
Recreation	No Impact	
Transportation and Traffic	Less than Significant with Mitigation	MM Traffic-1, MM Traffic-3, MM Traffic-4, MM Traffic-5, MM Traffic-6, MM Traffic-7
Utilities and Public Service Systems	Less than Significant	
Wildfire	Less than Significant with Mitigation	MM Fire-1, MM Fire-2

Resource Area	Level of Significance	Applicable Mitigation Measures from FEIR
Energy	Less than Significant with Mitigation	MM Air-2, MM Air-4
Tribal Cultural Resources	Less than Significant with Mitigation	MM CUI-1

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APPENDIX I

CULTURAL RESOURCES SURVEY REPORT

(Confidential, Redacted)

APPENDIX II

JURISDICTIONAL IMPACT SITE ASSESSMENT

Memorandum

To	Jennifer Kaminsky, San Diego Gas and Electric (SDG&E)	Page	1
CC			
Subject	Rose Creek Stream Crossing Jurisdictional Impact Site Assessment for the SDG&E Sycamore-Peñasquitos Transmission Project (Project)		
From	Michelle Fehrensens, AECOM		
CC	Chelsea Ohanesian, AECOM		
Date	September 14, 2017 (Revised on August 1, 2018)		

The Proposed Project Modification for the Sycamore-Peñasquitos 230 Kilovolt (kV) Transmission Line Project (Project) consists of adding temporary work area around 16 poles (Z479040 through Z479055) and 14 guard structures (GS 19 through GS 32) south of Carroll Canyon Road and east of Interstate 805 (I-805). If the Right-of-Entry permit from the San Diego Metropolitan Transit Development Board to access GS 23 requires installation of the guard structures to protect the railroad, the contractor would cross Rose Creek to install GS 23 for work on Poles Z479044 and Z479045. However, protection of the railroad using alternative methods, such as a bucket truck, are anticipated to be sufficient.

The existing road that goes through the Rose Creek drainage has been eroded away over time making it difficult to cross the creek without damaging the banks of the drainage. If crossing Rose Creek is needed, and to facilitate vehicle and equipment travel through the drainage, the contractor proposes to install large metal plates with cribbing material that could support the weight of work vehicles across the creek bed.

On August 30, 2017 a wildlife biologist, Ron Walker, conducted a site visit with the contractor to mark the contractor's proposed location of the metal plates. On August 31, 2017 a wetland specialist, Sundeep Amin, conducted a site assessment of the proposed location of the metal plates to confirm they would be placed outside the limits of waters under the jurisdiction of the California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB). The wetland specialist conducted a follow-up site visit of the crossing location on September 12, 2017 to memorialize the proposed location of the metal plates. During the site visit, the wetland specialist used a global positioning system (GPS) to map jurisdictional limits, as well as the coordinates of the corners of the proposed steel plates as marked in the field (Attachment A¹). The wetland specialist also marked the locations of the corners of the metal plates with pin flags (Attachment B). The pin flags clearly delineate that the plates, and any

¹ The aerial used in Attachment B is from 2016 and was the most recent aerial available which may not reflect the conditions currently onsite. Representative photographs are included in Attachment A.

support blocking, would be placed outside the jurisdictional areas. The use of steel plates to facilitate vehicle and equipment travel over Rose Creek is not expected to impact potential jurisdictional waters.

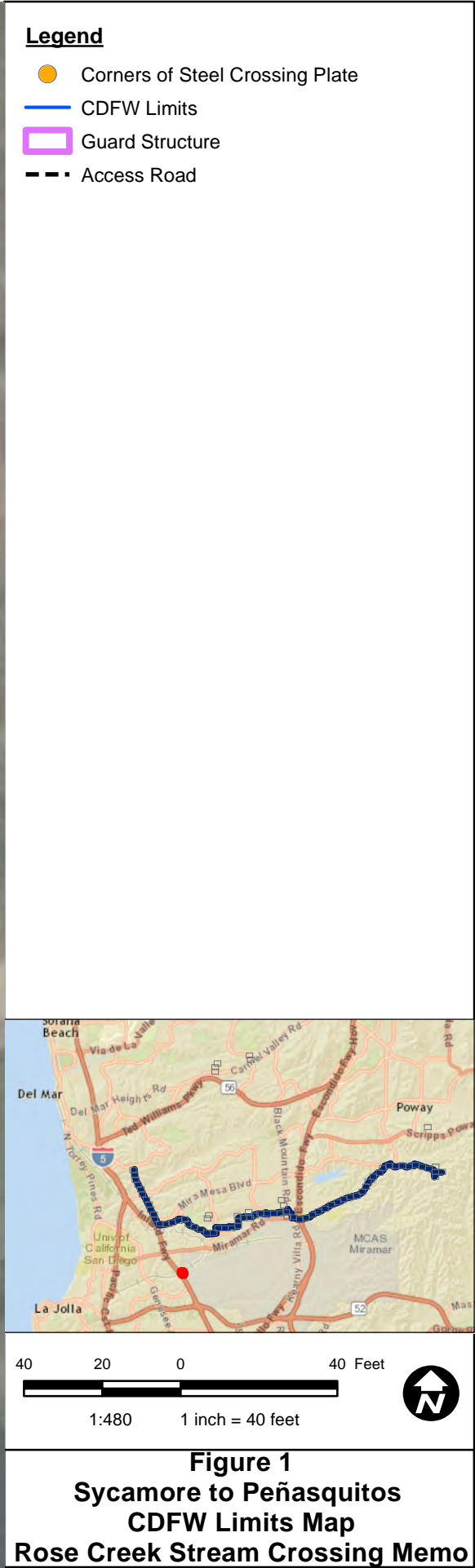
Species in the immediate vicinity of the proposed Rose Creek crossing include, western ragweed (*Ambrosia psilostachya*), rabbit's foot grass (*Polypogon monspeliensis*), umbrella sedge (*Cyperus eragrostis*), unknown sedge (*Cyperus* sp.), unknown eleocharis (*Eleocharis* sp.), unknown mustard (*Brassica* sp.), sow-thistle (*Sonchus oleraceus*), spotted spurge (*Chamaesyce maculata*), and cocklebur (*Xanthium strumarium*). Surrounding vegetation consisted of a mix of Diegan coastal sage scrub on the surrounding hills with patches of sycamores (*Platanus racemosa*) and poison oak (*Toxicodendron diversilobum*) closer to the drainage itself.

Attachments:

Attachment A – CDFW Limits Map

Attachment B – Site Photographs

ATTACHMENT A: CDFW LIMITS MAP



ATTACHMENT A
SITE PHOTOGRAPHS

Attachment B: Site Photographs
SX-PQ Rose Creek Steam Crossing Site Assessment



Photo 1. Photo (facing north) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.



Photo 2. Photo (facing east) of Rose Creek drainage. Pink pin flags denote the limits of the steel plate. CDFW limits are denoted by red lines.

APPENDIX III

PALEONTOLOGICAL RESOURCES MEMO

(Confidential, Redacted)

APPENDIX IV

2019 APPENDIX G COMPARISON TABLE

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
3.1	Aesthetics	<p><u>I. AESTHETICS. Except as provided in Public Resources Code Section 21099, W would the project:</u></p> <p><u>c) In non-urbanized areas, sSubstantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</u></p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA. The EA included an analysis of impacts to public views in both non-urbanized and urbanized areas.</p>
3.3	Air Quality	<p><u>III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</u></p> <p><u>c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</u></p> <p><u>d e) Create objectionable Result in other emissions (such as those leading to odors or dust) adversely affecting a substantial number of people?</u></p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA. The EA analysis included requirements by the San Diego Pollution Control District and analyzed potential odors from construction activities.</p>

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
3.4	Biological Resources	<p>IV. BIOLOGICAL RESOURCES: Would the project:</p> <p>c) Have a substantial adverse effect on <u>state or federally protected wetlands as defined by Section 404 of the Clean Water Act</u> (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	The changes in the 2019 Checklist do not change the analysis in the EA. The EA addressed impacts to both federal and state waters.
3.5	Cultural Resources	<p>V. CULTURAL RESOURCES. Would the project:</p> <p>a) Cause a substantial adverse change in the significance of a historical resource as defined in <u>pursuant to § 15064.5</u>?</p>	The changes in the 2019 Checklist do not change the analysis in the EA. The EA already reflects this terminology.
3.6	Geology, Soils, and Mineral Resources	<p>VII. GEOLOGY AND SOILS. Would the project:</p> <p>a) Expose people or structures to <u>Directly or indirectly cause</u> potential substantial adverse effects, including the risk of loss, injury, or death involving:</p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA. The EA analysis should be considered inclusive of both direct and indirect impacts.</p> <p>Chapter 3.12 - Paleontological Resources of the EA addressed the paleontological question.</p>

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
		<p>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</p> <p>ii) Strong seismic ground shaking?</p> <p>iii) Seismic-related ground failure, including liquefaction?</p> <p>iv) Landslides?</p> <p>d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial <u>direct or indirect</u> risks to life or property?</p> <p><u>f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</u></p>	
3.8	Hazards and Hazardous Materials	<p>VHIX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</p> <p>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard <u>or excessive noise</u> for people residing or working in the project area?</p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA. Chapter 3.11-Noise in the EA includes an analysis on excessive noise levels within the vicinity of an air land use plan and airport.</p> <p>The EA analysis related to wildland fires was comprehensive and did not exclude potential direct and/or indirect exposure to wildland fires as a result of the Proposed Project Modification.</p>

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
		<p>hg) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	
3.9	Hydrology and Water Resource	<p><u>ix. HYDROLOGY AND WATER QUALITY.</u> Would the project:</p> <p>a) Violate any water quality standards or waste discharge requirements <u>or otherwise substantially degrade surface or ground water quality?</u></p> <p>b) Substantially deplete <u>decrease</u> groundwater supplies or interfere substantially with groundwater recharge such that <u>the project may impede sustainable groundwater management of the basin</u> there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</p> <p>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river <u>or through the addition of impervious surfaces</u>, in a manner which would:</p> <p><u>(i)</u> result in substantial erosion or siltation on- or off-site;</p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA and would not result in a new significant impact.</p> <p>The 2019 Checklist revisions pertain to surface and groundwater quality, as well as the addition of impervious surfaces. The EA analysis would not differ as the Proposed Project Modification includes minor ground disturbing activities (i.e., vegetation and brush clearing) and would not involve the addition of new impervious surfaces.</p> <p>The Proposed Project Modification is not located within a flood hazard, tsunami, or seiche zone and therefore would not risk the release of pollutants due to project inundation. The Proposed Project Modification would comply with the regulatory requirements for protection of water quality.</p>

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
		<p><u>(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</u></p> <p><u>(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</u></p> <p><u>(iv) impede or redirect flood flows?</u></p> <p><u>d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</u></p> <p><u>e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</u></p>	
3.10	Land Use and Planning	<p>XI. LAND USE AND PLANNING. Would the project:</p> <p>b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA. The Proposed Project Modification would be similar to existing SDG&E operation and maintenance activities within the area and would not conflict with land use plans, policies and regulations adopted for the purpose of avoiding or mitigating environmental effects.</p>

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
3.11	Noise	<p>XIII. NOISE. Would the project result in:</p> <p>a) Exposure of persons to or <u>Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project</u> in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p> <p>b) Exposure of persons to or <u>Generation of excessive groundborne vibration or groundborne noise levels?</u></p> <p>c) For a project located within <u>the vicinity of a private airstrip</u> or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</p>	The changes in the 2019 Checklist do not change the analysis in the EA. Temporary noise impacts were analyzed in the EA and the Proposed Project Modification is not in the vicinity of a private airstrip.
3.13	Population and Housing	<p>XIV. POPULATION AND HOUSING. Would the project:</p> <p>a) Induce substantial <u>unplanned</u> population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</p> <p>b) Displace substantial numbers of existing <u>people or</u> housing, necessitating the construction of replacement housing elsewhere?</p>	The changes in the 2019 Checklist do not change the analysis in the EA.

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
3.15	Transportation and Traffic	<p>XVII. TRANSPORTATION/TRAFFIC. Would the project:</p> <p>a) Conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of <u>addressing</u> the circulation system, <u>including transit, roadway, bicycle and pedestrian facilities?</u> taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?</p> <p>b) <u>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</u> Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p> <p>c) <u>Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</u></p>	The changes in the 2019 Checklist do not change the analysis in the EA. The EA analysis addressed the impacts of road closures and establishment of detours, as well as pedestrian and bicycle facilities.

Appendix IV. 2019 Appendix G Comparison Table

EA Section	Topic	Revisions in 2019 Checklist	Reason for No Change in Analysis
3.16	Utilities and Service Systems	<p>XIXXVIII. UTILITIES AND SERVICE SYSTEMS.</p> <p>Would the project:</p> <p>ba) Require or result in the <u>relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities</u>, the construction or relocation of which could cause significant environmental effects?</p> <p>db) Have sufficient water supplies available to serve the project <u>and reasonably foreseeable future development during normal, dry and multiple dry years? from existing entitlements and resources, or are new or expanded entitlements needed?</u></p> <p>fd) <u>Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</u></p> <p>ge) <u>Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</u></p>	<p>The changes in the 2019 Checklist do not change the analysis in the EA as the Proposed Project Modification would not involve the relocation or expansion of a waste water treatment system, storm water drainage, electric power, natural gas, or telecommunication facilities. Additionally, the EA included analysis on the use of water supplies.</p>